

Cast Consultancy Ltd Privacy Policy

Pre-Manufactured Value (PMV) Estimator (the “Tool”)

Introduction

Cast Consultancy Ltd (“Cast”) is a specialist consultancy focused on the UK residential development & investment market

Cast, its branches and all affiliated entities (“we”, “us”, or “our”) understands that your privacy is important to you and that you care about how your personal data is used and shared by Cast. Cast is committed to respecting and protecting your privacy. This Privacy Policy (the “Policy”) provides you with an overview of how we collect, store and use any personal data that you provide to us or that we collect from third parties in relation to your use of the Tool.

Please take the time to read this Policy, which contains important information about the way in which we process your personal data in relation to the Tool.

We are a company registered in England and Wales with company number 09882722 and registered office Cast Consult Ltd, Charles Lake House, Claire Causeway, Crossways Business Park, Dartford, DA2 6QA.

Our individual responsible for data protection is our Chief Operating Officer, Lilly Gallafent, who can be contacted at Cast, Black Bull Yard, 24-28 Hatton Wall, London EC1N 8JH or by email at data@cast-consultancy.com or by calling us on 0203 931 0200.

Who this policy applies to: This policy applies to all users of the Tool.

What this policy contains: This privacy policy describes the following important topics relating to our use of your personal information in relation to the Tool.

Your rights to object: You have various rights in respect of our use of your personal information as set out in section 10. Two of the fundamental rights to be aware of are that:

- you may ask us to stop using your personal information for direct-marketing purposes. If you exercise this right, we will stop using your personal information for this purpose.
- you may ask us to consider any valid objections which you have to our use of your personal information where we process your personal information on the basis of our, or another person's, legitimate interest.



What you need to do and your confirmation to us: Please read this Policy carefully to understand how we handle your personal information in relation to your use of the Tool. By engaging with us in the ways set out in this Policy, you confirm that you have read and understood the entirety of this Policy, as it applies to you.

1. How do we obtain your personal information?

1.1 You enter your personal information directly into the Tool by accessing the Tool on our website.

2. What personal information of yours do we process?

2.1 Via the Tool, we may collect and use any of the following information about you (referred to in this policy as “personal information”) for the reasons set out in this policy:

- I. your name;
- II. your email address;
- III. your telephone number;
- IV. information provided when you correspond with us;
- V. any updates to information provided to us;
- VI. the following information created and recorded automatically when you visit our website and access the Tool:
 - a. Technical information. This includes: Internet Protocol (IP) address used to connect your computer to the internet address; the website address and country from which you access information; the files requested; browser type and version; browser plug-in types and versions; operating system; and platform. We use this personal information to administer our website which hosts the Tool, to measure the efficiency of our systems and to undertake an analysis on the locations from which people access the webpage which hosts the Tool; and
 - b. Information about your visit and your behaviour on our website which hosts the Tool.

3. Collection of your personal information and how we use it

3.1 Once you have entered your personal information into the Tool, this information goes straight into our Salesforce database and is then stored in this database. We may then use your personal information in one or more of the following ways:

- For improvement and maintenance of the Tool and to provide technical support for our website which hosts the Tool.
- To allow you to access and use the Tool.
- To receive enquiries from you through our website regarding the Tool.
- To generate sales leads for Cast. We will collect, use and store the personal information listed above, if you have consented or, otherwise, if it is in our legitimate interests, for business



development and marketing purposes, to contact you (including by telephone, email, post or social media channels) with information about our products and services which either you request, or which we feel will be of interest to you.

- On an anonymised basis (with no personal data), we may use aggregated reporting and statistics about users of the Tool for the purpose of internal reporting or reporting to third parties, and for our marketing and promotion purposes. None of these anonymised, aggregated reports or statistics will enable you to be personally identified.
- Download the information that you input into the Tool into Excel on Cast's secure systems and use the data you input which is not personal data (for example the size of the budget and the net internal area of the site in question) for modelling within Cast.[]

4. Additional use of personal information

4.1 We may also collect, use and store your personal information for the following additional reasons:

- a. to deal with any enquiries or issues you have about how we collect, store and use your personal information, or any requests made by you for a copy of the information we hold about you. If we do not have a contract with you, we may process your personal information for these purposes where it is in our legitimate interests to deal with your enquiries or requests;
- b. for internal reporting, administration, ensuring adequate insurance coverage for our operations, ensuring the security of our facilities, research and development, and to identify and implement operational efficiencies. We may process your personal information for these purposes where it is in our legitimate interests to do so;
- c. to comply with any procedures, laws and regulations which apply to us – this may include where we reasonably consider it is in our legitimate interests or the legitimate interests of others to comply, as well as where we are legally required to do so; and
- d. to establish, exercise or defend our legal rights – this may include where we reasonably consider it is in our legitimate interests or the legitimate interests of others, as well as where we are legally required to do so.

4.2 Before using your personal information for any purposes which fall outside those set out in this policy, we will undertake an analysis to establish if our new use of your personal information is compatible with the purposes set out in this section 4. Please contact us using the details in Section 14 if you want further information on the analysis we will undertake.

5. Legal bas for use of your personal information

5.1 We consider that the legal bases for using your personal information as set out in this privacy policy are as follows:



- a. our use of your personal information is necessary to perform our obligations under any contract with you in relation to the use of the Tool (i.e. the report that we produce following you entering information into the Tool); or
- b. our use of your personal information is necessary for complying with our legal obligations (for example, for health and safety purposes, anti-money laundering or compliance with HMRC requirements); or
- c. where neither (a) nor (b) apply, use of your personal information is necessary for our legitimate interests or the legitimate interests of others (for example, to ensure the security of our website which hosts the Tool). Our legitimate interests are to:
 - i. provide you with a report as requested to;
 - ii. run, grow and develop the Cast business;
 - iii. carry out marketing, market research and business development;
 - iv. for internal administrative purposes; and
 - v. aggregating data to report on trends.

If we rely on our (or another person's) legitimate interests for using your personal information, we will undertake a balancing test to ensure that our (or the other person's) legitimate interests are not outweighed by your interests or fundamental rights and freedoms which require protection of the personal information. You can ask us for information on this balancing test by using the contact details at section 14.

- 5.2 We may process your personal information in some cases for marketing purposes on the basis of your consent (which you may withdraw at any time after giving it, as described below).
- 5.3 If we rely on your consent for us to use your personal information in a particular way, but you later change your mind, you may withdraw your consent by contacting us at data@cast-consultancy.com and we will stop doing so. However, if you withdraw your consent, this may impact the ability for us to be able to provide those services which require use of this data.

6. How and why we share your data?

- 6.1 We may share your personal information with other third parties engaged with Cast where it is in our legitimate interests to do so for internal administrative purposes.
- 6.2 We will store your personal information in Salesforce and they will handle your personal information in accordance with the terms of their Privacy Policy.
- 6.3 We may share anonymised and aggregated statistical information with our clients and contractors where it is in our legitimate interests to do so.
- 6.4 Any third parties with whom we share your personal information are limited (by law and by contract) in their ability to use your personal information for any purpose other than to provide services for us.



We will always ensure that any third parties with whom we share your personal information are subject to privacy and security obligations consistent with this privacy policy and applicable laws.

6.5 We will disclose your personal information to third parties:

- a. if we are under a duty to disclose or share your personal information in order to comply with any legal obligation, any lawful request from government or law enforcement officials and as may be required to meet national security or law enforcement requirements or prevent illegal activity;
- b. in order to enforce or apply our terms of use, our terms and conditions for clients suppliers or any other agreement or to respond to any claims, to protect our rights or the rights of a third party, to protect the safety of any person or to prevent any illegal activity; or
- c. to protect the rights, property, or safety of Cast, our staff, our suppliers or clients or other persons. This may include exchanging personal information with other organisations for the purposes of fraud protection and credit risk reduction.

6.6 Save as expressly detailed above, we will never share, sell or rent any of your personal information to any third party without notifying you and, where necessary, obtaining your consent. If you have given your consent for us to use your personal information in a particular way, but later change your mind, you should contact us, and we will stop doing so.

7. How long we store your personal information

We keep your personal information for no longer than necessary for the purposes for which the personal information is processed. The length of time for which we retain personal information depends on the purposes for which we collect and use it and/or as required to comply with applicable laws and to establish, exercise or defend our legal rights. If you would like further information on how long we retain your data then please contact us at data@cast-consultancy.com

8. Where we may transfer your personal information

8.1 Your personal information may be used, stored and/or accessed by staff operating outside the EEA as our suppliers. Further details on to whom your personal information may be disclosed are set out in sections 4 and 6.

- a. If we provide any personal information about you to any such non-EEA staff or suppliers, we will take appropriate measures to ensure that the recipient protects your personal information adequately in accordance with this privacy policy. These measures will include the following: in the case of US based entities, entering into European Commission approved standard contractual arrangements with them, or ensuring they have signed up to the EU-US Privacy Shield (see further <https://www.privacyshield.gov/welcome>); or



- b. in the case of entities based in other countries outside the EEA, entering into European Commission approved standard contractual arrangements with them (or UK approved equivalent clauses).

8.2 Further details on the steps we take to protect your personal information in these cases is available from us on request by contacting us by email at data@cast-consultancy.com at any time.

9. Risks and how we keep your personal information secure

9.1 The main risk of our processing of your personal information is if it is lost, stolen or misused. This could lead to your personal information being in the hands of someone else who may use it fraudulently or make public information that you would prefer to keep private.

9.2 For this reason, Cast is committed to protecting your personal information from loss, theft and misuse. We take all reasonable precautions to safeguard the confidentiality of your personal information, including through use of appropriate organisational and technical measures.

9.3 In the course of provision of your personal information to us, your personal information may be transferred to us over the internet. Although we make every effort to protect the personal information which you provide to us, the transmission of information over the internet is not completely secure. As such, you acknowledge and accept that we cannot guarantee the security of your personal information transmitted to our website and that any such transmission is at your own risk. Once we have received your personal information, we will use strict procedures and security features to prevent unauthorised access to it.

9.4 Where we have given you (or where you have chosen) a password which enables you to access your online account, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

10. Your Rights

10.1 You have the following rights in respect of our collection and use of your data under the GDPR. Your rights are as follows:

- a. The right of access to the personal data we hold about you. You have a right of access to any personal information we hold about you. You can ask us for a copy of your personal information; confirmation as to whether your personal information is being used by us; details about how and why it is being used; and details of the safeguards which are in place if we transfer your information outside of the United Kingdom or the European Economic Area ("EEA").
- b. The right to rectification if any personal data we hold about you is inaccurate or incomplete. You have a right to request an update to any of your personal information which is out of date or incorrect.



- c. Right to delete your information. You have a right to ask us to delete any personal information which we are holding about you in certain specific circumstances. You can ask us for further information on these specific circumstances by contacting us using the details in section 14.
- d. The right to restrict (i.e. prevent) the processing of your personal data. You have a right to ask us to restrict the way that we process your personal information in certain specific circumstances. You can ask us for further information on these specific circumstances by contacting us using the details in section 14.
- e. Right to stop marketing: You have a right to ask us to stop using your personal information for direct marketing purposes. If you exercise this right, we will stop using your personal information for this purpose.
- f. Right to data portability: You have a right to ask us to provide your personal information to a third-party provider of services.
This right only applies where we use your personal information on the basis of your consent or performance of a contract; and where our use of your information is carried out by automated means.
- g. Right to object. You have a right to ask us to consider any valid objections which you have to our use of your personal information where we process your personal information on the basis of our or another person's legitimate interest.

- 10.2 We will consider all such requests and provide our response within a reasonable period (and in any event within one month of your request unless we tell you we are entitled to a longer period under applicable law). Please note, however, that certain personal information may be exempt from such requests in certain circumstances, for example if we need to keep using the information to comply with our own legal obligations or to establish, exercise or defend legal claims.
- 10.3 If an exception applies, we will tell you this when responding to your request. We may request you provide us with information necessary to confirm your identity before responding to any request you make.
- 10.4 We aim to give you strong controls on our use of your data for direct marketing purposes, including the ability to opt-out of receiving emails from us or selecting exactly what types of information you wish to receive from us via informing us at data@cast-consultancy.com
- 10.5 You can also access all personal information we hold on you by writing to us at Cast, Black Bull Yard, 24-28 Hatton Wall, London EC1N 8JH or by email at data@cast-consultancy.com or by calling us on 0203 931 0200.

11. Under 18

The Tool is intended for individuals over the age of 18 and our website and services are not directed at children and we do not knowingly collect any personal information from children.



If you are a child and we learn that we have inadvertently obtained personal information from you from our websites, or from any other source, then we will delete that information as soon as practicable.

Please contact us at data@cast-consultancy.com if you are aware that we may have inadvertently collected personal information from a child.

12. Links to other websites

Our website hosting the Tool may contain hyperlinks to websites that are not operated by us. These hyperlinks are provided for your reference and convenience only and do not imply any endorsement of the activities of such third-party websites or any association with their operators. This privacy policy only applies to the personal information that we collect or which we receive from third party sources, and we cannot be responsible for personal information about you that is collected and stored by third parties. Third party websites have their own terms and conditions and privacy policies, and you should read these carefully before you submit any personal information to these websites. We do not endorse or otherwise accept any responsibility or liability for the content of such third-party websites or third-party terms and conditions or policies.

13. Our Use of Cookies

Please refer to the Cast Cookie Policy on the Cast website for more information.

14. Contacting Us

- 14.1 If you have any questions about this Policy and how it affects you, please contact us by email at Cast, Black Bull Yard, 24-28 Hatton Wall, London EC1N 8JH or by email at data@cast-consultancy.com or by calling us on 0203 931 0200.
- 14.2 In accordance with Article 77 of the General Data Protection Regulation, you may also make a complaint to the Information Commissioner's Office, or the data protection regulator in the country where you usually live or work, or where an alleged infringement of the General Data Protection Regulation has taken place. Alternatively, you may seek a remedy through the courts if you believe your rights have been breached.

15. Policy review

This policy was last reviewed in November 2020. The content of the policy may be reviewed and changed without prior notice. Any changes we make to our privacy policy in the future will be posted on this page and, if any significant changes are made to the policy, this



