



Privacy Policy

Blocnet ("We") are committed to protecting and respecting your privacy and ensuring that when we collect and use information provided to us or information about visitors to our websites we do so in accordance with applicable data privacy laws.

This policy explains how information that we collect about you will be used.

Customer usage of our 'Blocnet' website

Information we may collect from you

You can use our Website without submitting any personal data. Any domain name information that we collect cannot be used to personally identify you. Instead it is collected to allow us, via Google Analytics, to measure visits to our website, page views and the average time spent.

We will ask for your name, email address and telephone number when you make an enquiry, in order to be able to get back in contact with. If you, at this stage, choose to opt in to receiving communications from us, your data will be stored to our database. This information will never be shared or sold with any third parties. You are able to ask to be removed from our mailing list at any time.

If you contact us, or we contact you, we may keep a record of that correspondence.

Personal information we collect automatically

When you use the Website we automatically receive and record information on our server logs from your browser or mobile platform, including your location, IP address, cookie information if we use cookies, and the page you requested. We treat this data as non-personal information, except where we are compelled to do otherwise by law or legal authority.

This data is only used in aggregate form to allow a third party service, Google Analytics, to create statistics by monitoring visitor behaviour patterns. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website.

The Google Analytics Terms of Service, which all Analytics customers must adhere to, prohibits the tracking or collection of personal information using Google Analytics, and we adhere to these terms.

If you wish to opt out of being tracked by Google Analytics, we encourage you to look at the Google Analytics Browser Opt-Out Add-on which might serve your needs.

Cookies

We may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer. We may also collect information about your computer, including, where available, your IP address. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our site and to deliver a better and more personalised service. They enable us to:

- estimate our audience size and usage pattern
- store information about your preferences, and so allow us to customise our site according to your individual interests
- speed up your searches
- recognise you when you return to our site



If you want to disable cookies you need to change your website browser settings to reject cookies. How you do this will depend on the browser you use.

If you choose to disable cookies, depending on which ones you disable, the website may not operate properly.

Details on how to disable cookies for the most popular browsers are set out below: -

For Microsoft Internet Explorer:

1. Choose the menu "tools" then "Internet Options"
2. Click on the "privacy" tab
3. Select the setting the appropriate setting

For Google Chrome:

1. Choose Settings> Advanced
2. Under "Privacy and security," click "Content settings".
3. Click "Cookies"

For Safari:

1. Choose Preferences > Privacy
2. Click on "Remove all Website Data"

For Mozilla Firefox:

1. Choose the menu "tools" then "Options"
2. Click on the icon "privacy"
3. Find the menu "cookie" and select the relevant options

For Opera 6.0 and further:

1. Choose the menu Files"> "Preferences"
2. Privacy

Client usage of our Secure Client Portal

Each of our customers is provided access to our Secure Client Portal. When the Secure Client Portal is accessed, we may collect data as follows:

- the data and time the Secure Client Portal was accessed
- how long any access lasted and which pages were viewed
- details of who accessed the Secure Client Portal including name, email address, IP address where available, type of device, details regarding the browser that was used

This data is stored and used as set out below.

Uses made of the data we hold

We may use data we hold on you in the following ways:

- providing services you have requested and notifying you about important changes or developments to these services
- responding to your enquiries and complaints or processing your requests in relation to your information
- follow up as part of our customer care procedures
- internal record keeping
- crime detection prevention and prosecution



- evaluating the effectiveness of our marketing and for research, training and statistical analysis with the aim of improving our services
- making our Website easier for you to use and providing you with access to certain parts of the Website

We will not pass your details to anyone else (other than on the basis set out below and in accordance with appropriate disclosure requirements we may be subject to).

Where We Store Your Personal Data

All data you provide to us is stored on secure servers. The data that we collect from you will not be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot fully guarantee the security of your data transmitted to our site; any transmission is at your own risk.

Your Rights

You have the right to ask us not to process your personal data for marketing purposes. We will always inform you (before collecting your data) if we intend to use your data for such purposes e.g. for sending our mailing list a newsletter or bulletin. You can exercise your right to restrict such processing by notifying us and we will take the necessary and reasonable steps to prevent you receiving such communications.

Permitted Purposes

We are the designated management company for your development where we provide such services and our obligations are set out within the lease by which you own your property.

Under the terms of the General Data Protection Regulations (GDPR) or the Data Protection Act (DPA), we are permitted to use, process or share your Personal Information where this is necessary for us to perform our obligations to you under the terms of the lease, to provide you with services and to enable you to perform your obligations under the terms of your lease to pay the appropriate service charge for those services and also to pay the ground rent applicable to your property where we are engaged to collect ground rent on behalf of a third party.

In this notice, these are known as the "permitted purposes" and this notice provides you with information concerning those, the parties with whom this information will be shared and the period during which this information may be shared with them.

Under the terms of the GDPR, if this information is not required to be retained for one of these permitted purposes by any of the parties then you may request the deletion or removal of your Personal Information from our records. It is important to note however that where that information is required for a permitted purpose it cannot be deleted from us or the party who requires it for that permitted purpose.

The permitted purposes and the parties to whom your Personal Information is provided are as follows:

- a. The owner of either the freehold to your development or your lessor under the terms of your lease being the party to whom you are obligated to pay the ground rent on your property



- b. Ourselves, Blocnet, for the purposes of collecting the ground rent where we do this, and for the purposes of collecting the service charge which is due from you. Also, to enable us to contact you in relation to the services which we are obligated to provide under the terms of the lease together with other services which we may provide from time to time for the convenience of you and other property owners on the development
- c. The party entitled to the ground rent may change from time to time, though you will always be notified of any such change. We will provide the new lessor with your contact information to enable them to inform you of this change and for them to thereafter collect the ground rent which is due. They may appoint an agent to act on their behalf in which case the agent will also be provided with your Personal Information necessary for this permitted purpose.

Where we are not collecting any ground rent on behalf of the lessor and this is collected either by the lessor direct or by their agent, we will satisfy ourselves that prior to providing them with any of your Personal Information they have in place reasonable safeguards to keep your Personal Information secure. However, you should refer to the terms of their respective privacy policies for details of exactly how they will retain and secure your Personal Information and the rights that you may have in relation to it

- d. Where it is necessary to enable us to provide the services set out in the lease or other services which we provide to you and other owners or occupiers of properties on the development we share certain items of your Personal Information with third parties involved in that permitted purpose. We are responsible for taking steps to ensure they have in place secure and effective systems for maintaining security of your Personal Information and for these permitted purposes you should refer to our Privacy Policy to understand how your Personal Information will be dealt with and your rights over it. You may opt out of certain of these additional services though we would encourage you to take advantage of them. In the event you do not wish to enjoy these services then we will arrange for the deletion of your Personal Information to the extent that any was provided to the third parties involved
- e. To enable us, or third parties, to collect payments from you or to make payments to you where these may be due in connection and for a permitted purpose, you may be asked to provide certain financial details to us such as your bank account. We confirm that such details will only be used for the purposes of collection or payment of monies due from and to you under the terms of the lease or for any other permitted purpose and any such information shall be kept securely in accordance with our Privacy Policy and Data Protection Policy from time to time

Access to Information

You have the right to access information held about you free of charge and we will provide this information within one month of receipt of request. If the request for data is complex or numerous we reserve the right to extend this period by a further two months.

Data Retention

In accordance with and as permitted by applicable law and regulations, we will retain your information as long as necessary to serve you, to maintain your account for as long as your account is needed to deliver our service and operate our business. We will retain and use your information as required by applicable regulation and information management policies to comply with our legal and reporting obligations, resolve disputes, enforce our



agreements, and complete any outstanding transactions and for the detection and prevention of fraud.