

# ED Group Holding Limited Privacy Policy

ED Group Holding Limited ("ED Group") has created this Privacy Policy which explains how and why we collect your data, what that data is, under what circumstances we may disclose or transfer it, and how we store it.

If you have any queries about the policy, please contact [info@edgroup.je](mailto:info@edgroup.je) and we will do our best to answer your questions.

C R A N W O O D   P R O P E R T Y   H O L D I N G S   L I M I T E D   I S   A   S U B S I D I A R Y   O F   E D   G R O U P

## I N T R O D U C T I O N   A N D   G E N E R A L   T E R M S

In order to provide you with the full range of services, we sometimes need to collect information about you.

ED Group is committed to protecting your personal information when you are using our services and takes the privacy of your information very seriously. This Privacy Policy explains our policy on how and for what purposes we use the information that is collected about you via the following services;

- Any ED Group website that links to this Privacy Policy
- Social media or official ED Group content on other websites
- Any personal information you provide to us by phone, SMS, email, in letters and other correspondence in person.

Our Privacy Policy does not cover the information practices of other companies and organisations that advertise our services and that may use cookies, pixel tags and other technologies to serve and offer relevant advertisements/promotions.

Whenever you provide such information, we are legally obliged to use your information in line with all applicable laws concerning the protection of personal information.

It should be read alongside the Terms and Conditions of ED Group and our Cookies Policy (below).

## W H O   A R E   W E ?

All information is collected and retained by ED Group, a company registered in the British Virgin Islands with company registration number 678722 whose registered office is at 4th Floor, 1 IFC, Jersey, JE2 3BX ("ED Group").

What information will ED Group collect about me?

We collect information you give us when you register with us, email us, arrange property viewings and when requesting brochures or other marketing collateral related to ED Group or one of the property developments with which it is associated. We require only the information we need to provide the service to you, such as:

Your Name

Postal Address

Telephone Number

Email Address

Country of Residence

Any additional information requested will be to help us improve our services, over and above the basic required information, and it will be clear on the form that your response is voluntary and you are free not to provide us with more information if you would prefer not to do so.

## W H E R E   E L S E   M I G H T   Y O U   H A V E   C O L L E C T E D   D A T A   A B O U T   M E   F R O M ?

ED Group works with third parties (including, for example, affiliate companies, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.

On occasion, ED group will work with third parties such as marketing services firms and media publishers to collect data on named individuals for marketing purposes.

Please note that third parties may use cookies, web beacons and other storage technologies to collect or receive information from your websites, apps and elsewhere on the internet and use that information to provide services including measurement services and target advertisements.

We may keep a record of data which is logged automatically by our ISP's servers, and which we analyse. This includes your IP address, the URL you visited before ours, the URL you visit after leaving our site and which pages you visit on our site.

We may also receive information from other companies who have obtained your consent to share information about you with us.

In all instances, ED Group endeavours to ensure that these third parties' privacy policies are appropriate.

## H O W   W I L L   E D   G R O U P   U S E   T H E   I N F O R M A T I O N   I T   C O L L E C T S   A B O U T   M E ?

ED Group may use your personal information for a number of purposes including the following:

- to provide our services, activities or online content, to provide you with information about them and to deal with your requests and enquiries;

- for "service administration purposes", which means that ED Group may contact you for reasons related to the service, activity or online content you have signed up for, to notify you of updates to our Privacy Policy or Terms of Use.
- where we provide personalised services, we may analyse the information you supply, as well as your activity on our (and other) services, so that we can offer a more relevant, tailored service. If you are subscribed to email newsletters, you will receive a personalised service. If you don't want to receive these services, you can unsubscribe from email newsletters.
- to contact you about a submission you have made
- to use IP addresses and device identifiers to identify the location of users, e.g. to deliver a personalised service, block unacceptable use, etc.;
- for analysis and research purposes so that we may improve the services offered by ED Group.

We may also use and disclose information in aggregate (so that no individuals are identified) for marketing and strategic development purposes.

Where ED Group proposes using your personal information for any other uses we will ensure that we notify you first.

#### WHEN WILL ED GROUP CONTACT ME?

ED Group may contact you:

- in relation to any service, activity or online content you have signed up for, in order to ensure that ED Group can deliver the services.
- in relation to any correspondence we receive from you or any comment or complaint you make about ED Group products or services;
- in relation to any personalised services you are using;
- in relation to any contribution you have submitted to ED Group, e.g. on ED Group message boards or via text or voicemail message;
- to invite you to participate in surveys about ED Group services (participation is always voluntary);
- to update you on any material changes to ED Group's policies and practices; and;
- for marketing purposes as set out below.

#### WILL I BE CONTACTED FOR MARKETING PURPOSES?

ED Group will only send you marketing emails or contact you on ED Group platforms where you have agreed to this.

We offer regular emails to let you know about ED Group services. From time to time we may also contact you to ask your views on issues affecting ED Group.

We may personalise the message content based upon any information you have provided to us and your use of ED Group platforms.

You can opt out from these communications at any time. You may either use the unsubscribe mechanism in any of the communications you receive, or contact [info@edcapital.je](mailto:info@edcapital.je).

#### WILL ED GROUP SHARE MY PERSONAL INFORMATION WITH ANYONE ELSE?

Generally, we will use your information within ED Group and our affiliates and will only share it outside ED Group and its affiliates where you have requested it or given your consent, except where disclosure is required or permitted by law or as described later in this section. Where this entails a transfer of data to third party companies outside the EEA, or to countries whose privacy regulations have not been declared adequate by the European Commission, we will ensure that suitable safeguards have been put in place to protect your privacy.

We reserve the right to pass this information to our group companies who adhere to the same privacy policy as ED Group.

We may share your information internally across the service and its affiliates, where this is necessary to provide you with a service you have requested. Please see section on how we use your information above for more details.

We will only share personal information with companies, organisations and individuals outside of ED Group and its affiliates when one of the following circumstances applies:

- With your consent

We will share personal information with companies, organisations or individuals outside ED Group and its affiliates when we have your consent to do so.

- For external processing

We provide personal information to our affiliates or other trusted businesses or persons to process it for us, based on our instructions and in compliance with our Privacy Policy and any other appropriate confidentiality and security measures.

- For legal reasons

We will share personal information with companies, organisations or individuals outside ED Group and its affiliates if we have a belief in good faith that access, use, preservation or disclosure of the information is reasonably necessary to:

- o meet any applicable law, regulation, legal process or enforceable governmental request.

- o enforce applicable Terms of Service, including investigation of potential violations.
- o detect, prevent or otherwise address fraud, security or technical issues.
- o protect against harm to the rights, property or safety of ED Group, our users or the public, as required or permitted by law.

We may share non-personally identifiable information publicly and with our partners – like publishers, advertisers or connected sites. For example, we may share information publicly to show trends about the general use of our services.

If ED Group is involved in a merger, acquisition or asset sale, we will continue to ensure the confidentiality of any personal information and give affected users notice before personal information is transferred or becomes subject to a different privacy policy.

#### HOW LONG WILL ED GROUP KEEP MY INFORMATION?

We will hold your personal information on our systems for as long as is necessary for the relevant activity, or as long as is set out in any relevant contract you hold with ED Group. In the case of marketing communications, your data will be held for as long as is set out in the data receipt you will have received when giving your consent for us to use your data. If you delete your account in any of ED Group's subsidiaries' websites your personal information is deleted in timeframes in accordance with local laws, and the remaining information is anonymised for analytical purposes. For further information about deleting your ED Group account, please see the deletion section below.

For a list of all data categories and retention periods, please contact [info@edgroup.je](mailto:info@edgroup.je).

#### CAN I DELETE MY DATA?

For as long as ED Group is providing services to you, an account with an associated named individual is a necessary part of delivering that service. However, any individual's personal data may be removed wherever requested, provided an alternative named individual is provided.

As explained in the section above, cancelling your ED Group account will erase any personal information in your account that we have about you and it will mean any data we hold about how you have used ED Group will be made anonymous.

Cancelling your ED Group service account will not delete the data you shared with ED Group for reasons that are not connected with that service. For example, if you download marketing collaterals or register for events. To delete non-service-related information, you may unsubscribe at any time – see individual communications for details.

#### CAN I FIND OUT WHAT PERSONAL INFORMATION ED GROUP HOLDS ABOUT ME?

You have the right to request a copy of the personal information ED Group holds about you, restrict its processing, request any inaccuracies be corrected or for your information to be transferred to a third party.

We will require you to prove your identity with two pieces of approved identification. We will use reasonable efforts consistent with our legal duty to supply, correct, transfer or delete personal information about you on our files.

Please address requests and questions about this or any other question about this Privacy Policy to our privacy lead, contactable via [info@edgroup.je](mailto:info@edgroup.je).

#### CHANGES TO ED GROUP'S PRIVACY POLICY

This Privacy Policy may be updated from time to time so you may wish to check it each time you submit personal information to ED Group. The date of the most recent revisions will appear on this page. If you do not agree to these changes, please do not continue to use ED Group websites or submit personal information to ED Group. If material changes are made to the Privacy Policy, for instance affecting how we would like to use your personal information, we will provide a more prominent notice (including, for certain services, email notification of Privacy Policy changes).

#### CONTACTING ED GROUP ABOUT THIS PRIVACY POLICY

Please address requests and questions about this or any other question about this Privacy Policy to our privacy lead, contactable via [info@edgroup.je](mailto:info@edgroup.je).

#### COMPLAINTS

You have the right to complain about the way in which we process your data. If you wish to do so, please contact your national data privacy supervisory authority.

#### OUR PROMISE TO YOU

When you provide us with this information, you agree to the collection, use and sharing of your information in accordance with this data privacy notice. Our promise to you is that:

- You are in control of your data
- You can change your privacy settings at any time
- If you don't think the data is correct tell us and we'll put it right
- We will keep your data secure
- We also promise to collect, process store and share your data safely and securely and to make sure the businesses we work with do the same.

## COOKIES

When you visit the site we may store some information (commonly known as a "cookie") on your computer. Cookies are pieces of information that a website transfers to your hard drive to store and sometimes track information about you. Cookies are specific to the server that created them and cannot be accessed by other servers, which means that they cannot be used to track your movements around the web. Passwords and credit card numbers are not stored in cookies.

A cookie helps you get the best out of the site and helps us to provide you with a more customised service. We use cookies for the following purposes:

- so that you will not have to re-enter your details each time you visit the site
- to track how the Site is used and to improve and update our content
- You can block or erase cookies from your computer if you want to (your browser's help screen or manual should tell you how to do this), but certain parts of the site are reliant on the use of cookies to operate correctly and may not work correctly if you set your browser not to accept cookies.

Most browsers are automatically set to accept cookies and you should be able to restrict or disable them if you wish by adjusting the settings on your browser. This will however affect your use of the areas of our site that use persistent cookies, such as the login areas. We do not use 'spyware', that is web bugs or hidden identifiers or other similar devices to gain access to information, store hidden information or to trace your activities. For more information about cookies and instructions on how to adjust your browser settings to restrict or disable cookies, see the IAB website at <http://www.allaboutcookies.org/>.

## COOKIES USED

\_ga

This is a Google analytics cookie and is used to distinguish unique users by assigning a randomly generated number as a client identifier. It is included in each page request in a site and used to calculate visitor, session and campaign data for the sites analytics reports.

\_gat

This is a Google analytics cookie, used to throttle the request rate - limiting the collection of data on high traffic sites. It expires after 10 minutes.

\_gat\_gtag\_UA\_\*\_\*

This is a Google session cookie, used to distinguish users.

\_gid

This is a Google session cookie, used to distinguish users. Default expiration time: 24 hours

pop

This is a cookie to determine if the register pop up form should display. If a visitor has already seen the pop up then the 'pop' cookie is set and the visitor will not see the pop up form.

exp\_csrf\_token

This cookie protects against Cross Site Request Forgery (CSRF). A CSRF attack forces a logged-on victim's browser to send a forged HTTP request, including the victim's session cookie and any other automatically included authentication information, to a vulnerable web application. This allows the attacker to force the victim's browser to generate requests the vulnerable application thinks are legitimate requests from the victim.

exp\_tracker

Tracks the last 5 pages viewed by the user, and is used primarily for redirection after logging in etc. Affects guests and logged in users.

exp\_last\_activity

Every time the state is updated (the page reloaded) the last activity is set to the current datetime. Used to determine expiry. This is essential for logged in users, but not for guests - it is set for both.

exp\_last\_visit

Sets the datetime that the user last visited the site, and is set for both guests and logged in users. If not set, is automatically set to 10 years ago. Affects guests and logged in users.

DSID, IDE

DoubleClick uses cookies to improve advertising. Cookies themselves contain no personally identifiable information. One of the main advertising cookies on non-Google sites is named 'IDE' and is stored in browsers under the domain doubleclick.net.