

## WEBSITE PRIVACY NOTICE FOR KENNEDY WILSON EUROPE

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### Introduction

Kennedy Wilson Europe (“KW”, “Kennedy Wilson”, “we”, “us” or “our”) respects the privacy rights of individuals and is committed to handling personal information responsibly and in accordance with applicable law.

Kennedy Wilson Europe and other Kennedy Wilson group companies are data controllers in respect of your data.

### Contact details

If you have any specific issues relating to this privacy notice, would like a list of Kennedy Wilson group companies who may process your data, or any wider privacy issues relating to us, please get in touch via our Contact Us page at [www.kennedywilson.com](http://www.kennedywilson.com) or by sending an email to [privacy@kennedywilson.eu](mailto:privacy@kennedywilson.eu).

### Scope of this Notice

This Privacy Notice only applies to personal information we collect through this website <https://marsheshopping.com/> (the ‘Site’). If you are a tenant or prospective tenant of a Kennedy Wilson property, please see our [Privacy Notice for Tenants](#).

The Privacy Notice does not apply to other third-party websites that you may reach through links on this Site. If you access other third-party websites using the links provided, the operators of these websites may collect information from you which will be used by them in accordance with their privacy notice, which will differ from ours.

### Information we collect from you and how it is used

If you browse this Site, subscribe to a mailing list, use a contact form or participate in other initiatives or activities that we may offer or operate through the Site from time to time, we may take some of your details.

The information we may collect and process about you and how it could be used broadly falls into the categories below.

Data subject	What data do we collect from you?	How we use your information?
Visitors to the website	<p>When you visit our Site, we may collect certain information automatically from your device. In some countries, including countries in the European Economic Area, this information may be considered personal information under applicable data protection laws.</p> <p>Specifically, the information we collect automatically may include information</p>	<p>Collecting this information enables us to better understand the visitors who come to our Site, where they come from, and what content on our Site is of interest to them.</p> <p>We use this information on an anonymised basis for our internal analytics purposes and to improve the</p>

	<p>like your IP address, device type, unique device identification numbers, browser-type, broad geographic location (e.g. country or city-level location), mobile network information, your mobile operating system, the type of mobile browser you use, and time zone setting and other technical information.</p> <p>We may also collect information about how your device has interacted with our Site, including the pages accessed and links clicked.</p>	<p>quality and relevance of our Site to our visitors.</p> <p>Some of this information may be collected using cookies and other similar tracking technology. For more information, please see our <a href="#">Cookie Policy</a>.</p>
Online registration for information regarding the property	The information you provide by registering your details on the Site requesting news or information about the property or our offering of services; contacting us via an online contact form; including your title, name, contact details, and preferences.	We may use this information to understand your needs and provide you with the services you have requested.
Contacting us/ Responding to our emails	If you contact us we may keep a record of that correspondence and the information you provide and any amended information you provide when responding to our emails including your title, name, contact details and changes to your contact preferences.	If you contact us, we will only use your information in relation to any further correspondence with you and to ensure that the information we hold about you is kept accurate and up to date.
Photo/ Video Sharing/ Forums/ Blogs/ Social Media websites relating to the property	The information or images you provide when you post content to or comments on, or otherwise submit material for publication in, various areas of our Site, including our chat forum, bulletin board, blog, micro-blog, forum, video and photo galleries and other interactive areas.	We may use this information in line with specific competition terms or terms of use of external social media providers, published from time to time and will be available to you at the time of entry or posting.
Use of WiFi facilities at the property	The information you provide when registering to use this service, including your title, name and contact details, usage of the service.	Providing you with the WiFi facility; additionally, if you also register or are already registered with us, we will note that you used the WiFi facility and only where necessary, monitor and track any usage for keeping the property secure at all times.

## **Legal basis for processing personal information**

Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

We will normally collect personal information from you only (i) where we need the personal information to perform a contract with you, (ii) where the processing is in our legitimate interests and not overridden by your rights, or (iii) where we have your consent to do so. In some cases, we may also have a legal obligation to collect personal information from you or may otherwise need the personal information to protect your vital interests or those of another person.

If we collect and use your personal information in reliance on our legitimate interests (or those of any third party), this interest will normally be to operate our platform and communicating with you as necessary to provide our services to you and for our legitimate commercial interest, for instance, when responding to your queries, improving our platform or undertaking marketing.

## **How long we keep your information for**

We will keep your personal information for as long we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

## **Who do we share your information with**

We may disclose your personal information to:

- to our group companies, our owners and affiliates, third party services providers, suppliers and partners that process information on our behalf and assist in providing our services to you (for example, to support the delivery of, provide functionality on, or help to enhance the security of our Site), or who otherwise process personal information for purposes that are described in this Privacy Notice or notified to you when we collect your personal information;
- to any competent law enforcement body, regulatory, government agency, court or other third party where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person. This includes exchanging information with other companies and organisations for the purposes of fraud protection;
- to potential buyers or financiers or replacement owners or operators of all or part of our business on the basis of our legitimate interests and the interests of such person, so that they can appropriately value the business and assess any risks relating thereto;
- to any other person with your consent.

## **Where we store or process your information**

The information we collect from you may be transferred to, processed and stored at, a destination outside the European Economic Area (“EEA”) or UK. Specifically, KW’s servers are located in the UK

and Ireland, and our group companies and third-party service providers and partners operate around the world, including the US. This means that when we collect your personal information we may process it in any of these countries.

Such destinations or countries may not have laws which protect your information to the same extent as in the EEA or UK. It may be processed by us or by our service providers operating outside the EEA or UK, but we will take appropriate steps to ensure that your information is treated securely and in accordance with this Privacy Notice.

### **Cookies and similar tracking technology**

We use cookies and similar tracking technology (collectively, “Cookies”) to collect and use personal information about you. For further information about the types of Cookies we use, why and how you can control Cookies, please see our [Cookie Policy](#).

### **How do we keep your personal information secure?**

We have implemented security policies, appropriate organisational and technical measures to protect the information that we have under our control from unauthorised access, improper use or disclosure, unauthorised modification and unlawful destruction or accidental loss. Where you have chosen a password that enables you to access certain parts of our Site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we do our best to protect your information, we cannot guarantee the security of your information transmitted to our Site and any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

### **Children**

We do not knowingly collect information from children under 13 years of age.

### **Your rights**

You have the right to opt-out from marketing communications we send you at any time.

If you wish to withdraw your consent to receive marketing materials, this can be done by:

- updating your preferences on your online account, if you have one;
- clicking on the unsubscribe link on any emails we send you; or
- emailing us at [privacy@kennedywilson.eu](mailto:privacy@kennedywilson.eu).

If you withdraw your consent, this will not affect our rights to have sent you marketing material prior to your withdrawal, but we will not send any further marketing. Whilst we will endeavour to ensure that you do not receive any further marketing material immediately, there may be a slight delay for any changes to take effect.

You are also entitled to request that we:

- provide you with a copy of any personal information we hold about you;

- have any incorrect personal information corrected or completed (you can also update your records using your profile on your online account, if you have one);
- delete any personal information that we no longer need for the above purposes, where you have withdrawn your consent and there are no other grounds to process that information, where the personal information has been unlawfully processed or where we are required by law to delete it;
- restrict the processing of your personal information whilst we confirm whether any information needs correcting following your request, the processing is unlawful and you do not want us to delete this personal information; where we no longer need to process the personal information, but you require the information to establish, exercise or defend legal claims. In these circumstances we will only process your personal information for purposes for which you have consented, or for the establishment, exercise or defence of legal claims or the protection of the rights of another person; and/or
- object to our processing of your personal information, where we process it under the legitimate interests' grounds and we are unable to show a compelling legitimate interest that overrides your interests, rights and freedoms, or for the purposes of defending, exercising or defending legal claims

If you wish to make such a request, please contact us at [privacy@kennedywilson.eu](mailto:privacy@kennedywilson.eu).

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

You are also entitled to lodge a complaint with your local data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority. Contact details for data protection authorities in the European Economic Area countries are available [here](#).

### **Changes to our Privacy Notice**

Any changes that we make to our Privacy Notice will be detailed on the Site or otherwise notified to you, in accordance with applicable data protection laws.