

## PRIVACY POLICY FOR WEBSITES OF KW PROPERTIES

[MXB on behalf of Marshes Shopping centre] (“we” or “us” or “our”) is committed to protecting your privacy and this Privacy Policy explains how we may collect, use, or disclose, information about you. If you should have any questions about privacy or data protection please contact us at [insert appropriate contact address for website manager](#).

### Scope of this Policy

This Privacy Policy applies to the website <https://marshesshopping.com/> (the ‘Site’), and generally to the use of your information by us. From time to time we may also provide you with additional information on how we will use your information.

The Privacy Policy 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 policy, 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 (whether online or offline) that we may offer or operate 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.

<b>Data subject</b>	<b>What data do we collect from you?</b>	<b>How we use your information?</b>
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 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</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 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 Cookie Policy.</p>

	Site, including the pages accessed and links clicked.	
Online registration	<p>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.</p> <p>In order to successfully complete a registration form, you must also consent to us contacting you by e-mail, by post and through any other means of contact that you choose to provide to us.</p> <p>We may also collect information related to the particular service you have used.</p>	<p>We may use this information:</p> <ul style="list-style-type: none"> <li>• to understand your needs and provide you with the services you have requested;</li> <li>• to provide you with information about events, special offers, promotions and other matters that you request from us or which we consider may be of interest to you (including host mailings);</li> </ul>
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.	<p>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.</p> <p>And with your consent:</p> <ul style="list-style-type: none"> <li>• to understand your needs and provide you with the services you have requested;</li> <li>• to provide you with information about events, special offers, promotions and other matters that you request from us or which</li> </ul>

		we consider may be of interest to you (including host mailings).
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.
CCTV images	Images of you collected from CCTV cameras in operation at the property	<p>Where we consider that, on balance, it is appropriate for us do so, we will process CCTV footage for the following legitimate interests:</p> <ul style="list-style-type: none"> <li>• keeping our staff, visitors and property safe and secure;</li> <li>• ensuring compliance with health and safety procedures;</li> <li>• detecting and preventing crime; and</li> <li>• assisting law enforcement agencies in the apprehension, investigation and prosecution of offenders.</li> </ul> <p>This may include sharing footage with the police or other law enforcement agencies, or our insurers where necessary in relation to a claim, as well as any other third parties in connection with legal proceedings or emergency situations.</p>

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

### **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, 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 Policy 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;

- successors in title or replacement owners or operators of all or part of our business;
- to any **other person with your consent**.

### 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.

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; or
- by clicking on the unsubscribe link on any emails we have sent; or
- emailing us at [digital@hellomxb.com](mailto:digital@hellomxb.com)

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 may 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 [digital@hellomxb.com](mailto:digital@hellomxb.com). We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

For example, we may require additional information to either confirm your identity before we can process your request and/or to assist us in responding to your request.

If you are unhappy with the outcome of your request or with our processing of your personal information, you are entitled to lodge a complaint with your local data protection authority.

### **Changes to our Privacy Policy**

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