

Hometree Group Privacy Policy

At the Hometree Group, we value transparency and your privacy. This page has everything you need to know about how we use your data. If you have any questions about our Privacy Policy, we'd love to hear from you - just email <u>support@hometree.co.uk</u>

Please read this carefully to understand how we will collect and use your personal information. Our Privacy Policy only takes 10-15 minutes to read. By using our Service you acknowledge you have read and understood this privacy policy.

We are Hometree Marketplace Limited, trading as **Hometree**. We refer to Hometree as "**we**", "**us**" and "**our**". We operate the following sites:

Hometree	www.hometree.co.uk
Hometree Finance	www.hometreefinance.co.uk
Your Repair	www.yourrepair.co.uk
Geowarmth	www.geowarmth.co.uk
Hometree Group	https://www.hometree.co.uk/group/

This is the Privacy Policy for each of these websites. We refer to hometree and each of the sites listed above, as the "**Service**".

For the purposes of UK and EU data protection law, (the "**Data Protection Law**"), the controller of the Service is Hometree. This policy sets out:

- Information we collect about you
- How we use your information
- Our promotional updates and communications
- Who we share your information with
- Where we store your information
- Public forums
- Child safety
- How we protect your information



- How long we keep your information
- Your rights
- Changes to this policy
- Contacting us

Information we collect about you

Customers and prospective customers

We will collect and process certain personal information if you use our Service.

Members of our trade network

We also process information about you:

- if you, or the company you work for, are a selected network member of ours.
- if you or the company you work for use our Service generally.
- you are someone, or you work for someone, to whom we want to advertise or market our Service.

Candidates and Employees

We also process information about you:

- If you apply to a role which is offered by any company in the Hometree Group.
- If you are an employee of the hometree group.
- To manage your welfare where we have an obligation to do so.

How we use your information

We use your personal information in different ways. We've set these out below, along with the types of personal information we use for each purpose, and the legal reason(s) (also known as the 'legal basis') that permits this processing.

We explain more about what each legal basis means below. We may process your personal information based on one or more than one legal basis, depending on the specific ways we are using your personal information.

Customers

How we use this personal information	Type of personal information	Our legal bases for processing
 To perform our contract with you under our Terms of Use and manage our relationship with you, including: providing our Service to you, administering your account with us (if you create one), storing your personal information, providing information to you which you have requested, sending you service updates, notifying you about changes to our terms or privacy policy, notifying you of any changes to our Service. 	 Identity Contact Account Finance Location 	 Contract Legal Obligation Our legitimate interests
To put you in touch with other companies in the Hometree Group who may provide additional services including but not limited to finance options, other insurance products and products supplied by out installation network and group companies.	IdentityContactAddress	• Our legitimate interests



To register you as a new customer who wants to use any of our services, if you take out any of our insurance products an account will automatically be created for you.	IdentityContact	Contract
 To allow you to purchase an insurance contract from hometree, or a party acting on behalf of the Hometree group of companies (as applicable): Reviewing information you submit as part of the application process in order to underwrite insurance. providing your information to our insurer, processing payment (e.g. receiving a bank transfer from you). 	 Identity Contact Account Location Purchase 	• Contract
To allow you to apply for financing with Hometree Finance	 Identity Contact Financing application 	 Our legitimate interests Contract



 To promote our service to you and keep you updated with information about our services, including: delivering relevant content on topics we think may be of interest to you, and letting you know about new functionalities or services. To ask you to leave a review, provide feedback or take a survey. To offer you exclusive deals and offers. 	 Identity Contact Account Automatically collected information 	 Consent Our legitimate interests
To manage and administer promotions, competitions and prize draws which you enter, subject to their terms and conditions which will be notified to you when you enter, including collecting and checking entries, contacting winners, awarding and delivering any prizes, and complying with our regulatory obligations.	IdentityContactInteraction	 Consent Legal obligation Our legitimate interests



To customise your experience and offer you relevant ads, content and recommendations including information about new promotions and competitions. To deliver dynamic marketing and show you non-personalised ads on our website.	 Contact Account Automatically collected information Identity 	 Our legitimate interests Consent (to Cookies)
Social media integrations: Our marketing campaigns use Facebook's advertising and audiences tools, including tracking pixels, to inform and refine our marketing and deliver more relevant ads to you.		
For measuring, understanding and optimising the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you.		



To administer our Service and for internal operations, including bug fixes, troubleshooting, data analysis, testing, and survey purposes. To improve our Service to ensure that content is presented in the most effective manner for you and for your computer. We may also use aggregated information to help us plan and introduce new features. To keep our Service safe and secure , including taking steps to detect and prevent fraud.	 Contact Interaction Automatically collected information 	• Our legitimate interests
To analyse our user base, Service and service usage, feature and content popularity, software and hardware quality, and market trends. We may also use this information to inform, refine and deliver our wider online marketing campaigns, including delivering our advertisements to you when you are not on our Service.	 Identity Contact Account Interaction Automatically collected information 	 Our legitimate interests Consent (to Cookies)



Members of our trade network

How we use this personal information	Type of personal information	Our legal bases for processing
If you are a member of our trade network, or are otherwise interacting with us in a business context, we may also use your personal information for the following purposes.		
To perform or enter into any contract we have with you	 Contact Identity Company Account 	Contract
To administrate yours or your company's accounts with us. To make and verify payments and bills.	 Contact Identity Company Account 	 Contract Our legitimate interests
In the event that we sell or buy any business or assets , disclose your data to a prospective seller or buyer, or in the event we are the subject of acquisition by a third party.	 Information relating to transactions 	 Contract Legal obligation Our legitimate interests
To answer any queries you send us To comply with any rights requests you make	 Contact information 	ConsentLegal obligation



Employees

How we use this personal information	Type of personal information	Our legal bases for processing
If you are an employee of the Hometree Group (including contractors working on a self employed basis) we may also use your personal information for the following purposes.		
To perform or enter into any contract we have with you	 Contact Identity Company Account 	 Contract
To administrate payroll in respect of your remuneration package, Tax and National insurance	ContactIdentityFinance	 Contract
In any Legal Proceedings or comply with any legal access requests you make	ContactIdentity	 Contract Legal obligation
To protect your welfare in which we have a duty of care over you i.e contacting next of kin, important medical information.	ContactIdentityMedical	 Consent Vital interest Legal obligation

When we receive your personal information from a third party, they will be a separate data controller of your personal information, and will have their own legal bases for processing.



Our promotional updates and communications

Where permitted in our legitimate interests (explained below) or with your prior consent if required by law, we may

- send you marketing and promotional updates about our products and services, by email and SMS, if you have opted-in to receiving these.
- We will also use your personal information for marketing analysis.

You can object to further marketing at any time by selecting the "unsubscribe" link at the end of all our marketing and promotional update communications to you, by updating your marketing preferences in our self service customer portal, or by sending us an email to support@hometree.co.uk.

Who we may share your information with

We may give your information to:

- Any company in the Hometree group, which means our shareholders, investors, subsidiaries, our ultimate holding company and its subsidiaries, who support our processing of personal information under this policy. If any of these parties use your information for direct marketing, we will only transfer it to them for that purpose with your prior consent. This includes companies which are acquired after the date of publication of this policy.
- Our partner and support businesses, including support services, finance lenders, advertising networks, prize draw or competition partners, and analytics providers.
- Our **Payment processor**, so they can collect payment for our services either via direct debit or through monthly charges to your chosen card.
- Members of our trade network and repair companies who provide installation and repair services under any of our services.
- Social media networks.
- Providers of review sites that we use.
- Our live chat software provider

If you apply for the hometree finance heating plan we will supply your personal information to credit referencing agencies (CRAs) and they will give us information about you such as your financial history. We do this in order to assess creditworthiness and product suitability, to check your identity, manage your account, trace and recover any debts and prevent criminal activity.



We also continue to exchange information about you with CRAs on an ongoing basis, including information about settled accounts, outstanding debts and missed or late payments. CRAs will share your information with other organisations. Your data will also be linked to parties you are financially connected to such as spouse, join applicants, financial associates and any other relevant party. More information about CRAs can be found at <u>www.transunion.co.uk/crain</u>

Where we store your information

We may transfer and store your personal information outside the United Kingdom ("**UK**") and/or European Economic Area ("**EEA**") in countries which may not have equivalent Data Protection Law.

Where your information is transferred outside the UK or EEA, we will take steps to ensure your personal information is protected by appropriate legal safeguards, and that it is treated securely and in accordance with this privacy policy.

Child safety

Protecting the safety of children when they use the Internet is important to us.

The Service is intended for use only by persons who are at least 18 years of age.

By using the Service, you confirm to us that you meet this requirement. If you are under the age of 18, you confirm you have received permission from your parent or guardian before using this site or sending us personal information.

If you are under the age of 18 your parent or guardian must consent on your behalf where we ask for consent in relation to the use of your information.

We do not conduct business with any persons under the age of 18 years old.

How we protect your information

All information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of the Service, 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 will do our best to protect your personal information, including using SSL encryption to secure our site and protect your information in transit, we cannot guarantee the security of your data transmitted to the Service; 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.



Our site may, from time to time, contain links to external sites. We are not responsible for the privacy policies or the content of such sites.

How long we keep your information

We keep personal information for

- as long as you have an account with us or use our Service (including if you enter a prize draw, competition or other promotion) in order to meet our contractual obligations to you and
- six years after that to identify any issues and resolve any legal proceedings.

We may also retain aggregate information beyond this time for research purposes and to help us develop and improve our services. You cannot be identified from aggregate information retained or used for these purposes.

Your rights

You have the right under certain circumstances:

- to be provided with a **copy** of your personal information held by us;
- to request the correction or erasure of your personal information held by us;
- to request that we **restrict** the processing of your personal information (while we verify or investigate your concerns with this information, for example);
- to **object** to the further processing of your personal information, including the right to object to marketing.
- To request that your provided personal information be moved to a third party.
- Your right to withdraw consent:

Where the processing of your personal information by us is based on consent, you have the right to withdraw that consent without detriment at any time by contacting us. You can also exercise the rights listed above at any time by contacting us at support@hometree.co.uk

If your request or concern is not satisfactorily resolved by us, you may approach your local data protection authority, (see <u>https://ico.org.uk/</u>).

The Information Commissioner is the supervisory authority in the UK and can provide further information about your rights and our obligations in relation to your personal information, as well as deal with any complaints that you have about our processing of your personal information.



Legal bases explained

• **Consent:** We will process your personal information for promotional or marketing purposes where you have given us your express consent for us to do this, where required by law. This includes sending you alerts about your saved searches.

You can opt-out of further marketing at any time by selecting the "unsubscribe" link at the end of all our marketing and promotional update communications to you, or by sending us an email at support@hometree.co.uk.

We also rely on consent for some of the cookies we use (see our Cookies Policy for more detail).

- **Contract:** We collect, store and process your personal information where it's necessary for performing a contract you have with us (such as our Terms and Conditions, any applicable terms for a prize draw, competition, or other promotion or where you have asked us to take specific steps before entering into that contract).
- Legal Obligation: We may need to process your personal information to comply with our legal obligations, including under applicable local, UK and EU law (including Data Protection Law and any licensing requirements), and/or any court orders.

If we run a prize draw, competition or other promotion we may need to publish limited personal information to demonstrate that an award took place. If you have any questions about this, please contact us.

- Legitimate interests: processing your personal information is sometimes necessary for us to do the following activities, in our own interest or sometimes in the interests of a third party, like third parties we work with. Our legitimate interests are:
 - Gaining insights on how you use our Service.
 - Delivering, developing and improving our Service.
 - Enabling us to enhance, customise or modify our Service, service and communications.
 - Growing our business and informing our marketing strategy.
 - Keeping our records updated.
 - Improving our Service and data security.
 - Enforcing or applying our terms or other agreements with you, including recovering fees or other debt due to us.
 - Complying with and enforcing our agreements with contractors, financing providers and other third parties, including sharing necessary information and recovering fees or other debt due to us.



- In each case, we balance our legitimate interests with your rights and interests. If you would like further information about how we assess our legitimate interests, please contact us.
- We also use different types of cookies (including tracking pixels and other automatically collected information) on our Service with your **consent** we explain this in the Cookies Policy.

Please contact us if you would like further details about the specific legal basis we are relying on to process your personal information.

Use of Cookies

We use cookies and/or other similar technologies on our website. These typically involve pieces of information or code that a website transfers to or accesses from your computer hard drive or mobile device to store and sometimes track information about you.

Cookies can be used to:

- help us remember you when you visit our website from the same computer or device, and you interact with websites and online services
- manage a range of features and content
- present personalised content.

The website uses cookies and similar technologies to distinguish you from other users of the website. This helps us to provide you with a good experience when you browse our website, and also helps us to improve the website.

We use the following types of cookies

- Necessary: these cookies are required for our website to function and cannot be switched off
- Functional: we use these cookies so that we can recognise you on our website and collect feedback.
- Performance: we use these cookies to understand and analyse the key performance indexes of the website, which helps in delivering a better user experience for visitors to our website.
- Analytics: we use a number of different third party analytics cookies to understand and analyse how you interact with our website, so that we can improve customer experience.
- Advertising: These cookies allow us and similar organisations to show you adverts that we think will be of interest to you. Through our use of tracking technologies these adverts are personalised to you.



Changes to this policy

Any changes we make to our privacy policy in future will be posted on this page and, in relation to substantive changes, will be notified to you by email. This policy was last updated on **8th April 2024.**

Contacting Us

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to: <u>service@hometree.co.uk</u>