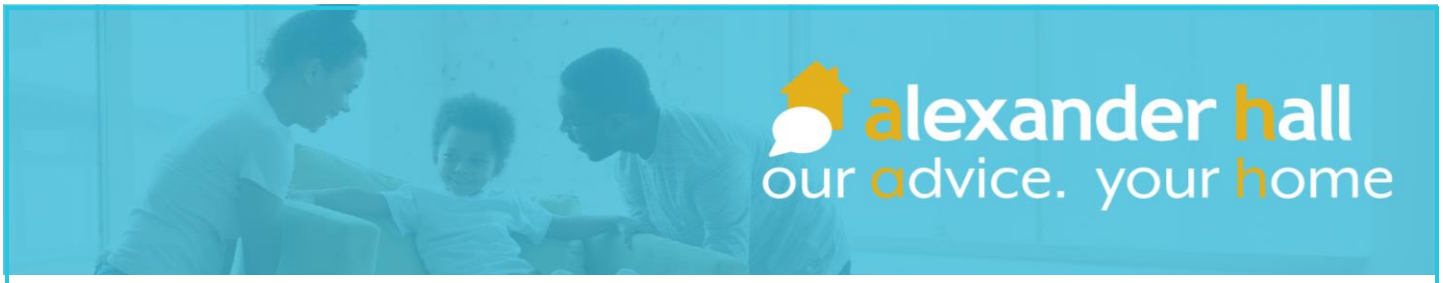


Alexander Hall

Privacy Policy



Alexander Hall Privacy Policy

At Alexander Hall we are committed to ensuring that your privacy is protected. This Privacy Policy, together with our Terms and Conditions and any other privacy notice referred to in it, explains how we collect and use your personal data when you visit our website, contact us or use our services.

Alexander Hall Limited is data controller in respect of the personal data processed when you visit our website. We are registered with the Information Commissioner's Office (ICO) and our registration number is Z4989532.

If you have any questions or concerns in relation to this Privacy policy you can contact our Compliance Team at AHCompliance@alexanderhall.co.uk or by writing to the Compliance Team, Alexander Hall Associates Limited, 137-144 High Holborn, London WC1V 6PL.

This privacy policy was last amended in September 2026. It supersedes any earlier version.

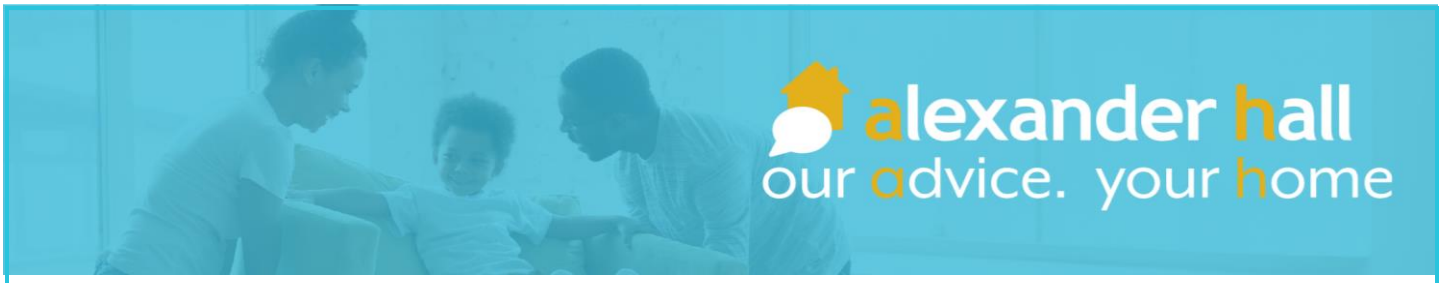
Third-party links

This website may include links to third party websites, plug-ins or applications which may allow third parties to collect or share your personal data. We are not responsible for their use of your personal data and cannot control it.

What information we may collect and how we use it

As a business we collect, use, store and transfer different types of personal data depending on who you are. If you are applying for a mortgage or insurance policy through Alexander Hall, we collect and use your personal data in order for us to provide you with our services. The personal data we collect and use may include:

- Identity Data (name, marital status, title, date of birth, gender, username and password, purchases made by you, your interests and preferences, feedback and survey responses)
- Special Category Data, for example, data concerning a person's health, ethnicity and race, details of criminal offence / convictions, details about vulnerable people in your household, such as children or elderly people (and we may ask for their ages and dates of birth and information about any special requirements they may have) or other information we may require to comply with guidelines on matters of public health or concern (e.g. Covid-19).
- Contact Data (billing address, delivery address, email address and telephone numbers)
- Financial Data (bank account and payment details)
- Transaction Data (details about payments to and from you and other services you have purchased through us)
- Technical Data (internet protocol address, login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, identification number, online identified, location data and other similar identifying information required for the customer's device(s) to communicate with websites and applications on the internet)
- Usage Data (how you use our website products and services, the full uniform resource locators clickstream to, through and from our site (including date and time), download errors, lengths of visit to certain pages, page interaction information, methods to browse away from the page and any phone numbers you use to call us)
- Marketing and Communications Data (your marketing preferences from us and our third parties and your communication preferences)



We also may collect and use Aggregated Data. For example, when you visit our website we may aggregate data about your usage to tell us about how certain features on our website are used. This is not usually classified as personal data as whilst it derives from personal data (in the example, it is derived from your Usage Data) it does not reveal your identity to us. If we do link this Aggregated Data to your personal information, it will be treated as personal data in line with this policy.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us. You can ask us to rectify or update your personal information at any time by email to DPAconsents@alexanderhall.co.uk or by writing to the Compliance Team, Alexander Hall Associates Limited, 137-144 High Holborn, London WC1V 6PL.

How is your personal data collected?

We use different methods to collect data from and about you including through:

Direct interactions

You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

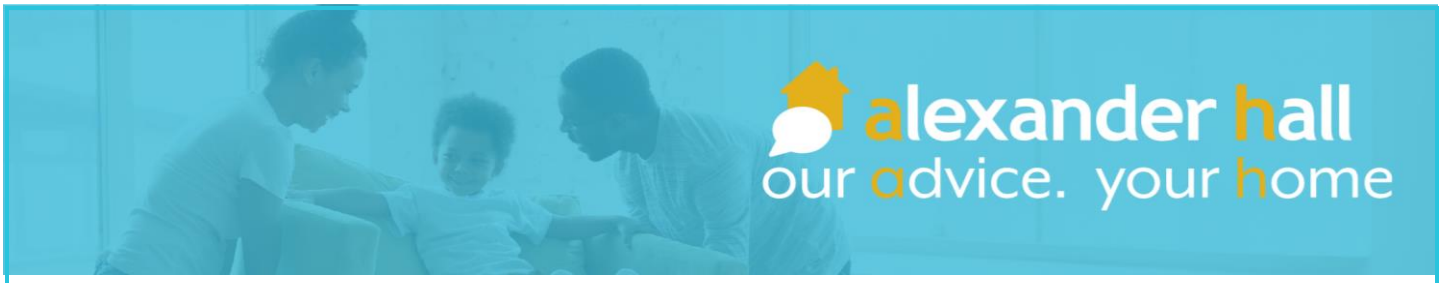
- apply for our services;
- use the contact form on our website;
- subscribe to our service or publications;
- request marketing to be sent to you;
- walk-in to our branch offices or telephone our call centre;
- enter a competition, promotion or survey; or
- give us some feedback.

Third parties or publicly available sources

We may receive personal data about you from various third parties and public sources as set out below:

Technical Data from the following parties:

- analytics providers such as Google based outside the EU;
- Identity and Contact Data from publicly availably sources such as Companies House and the Electoral Register based inside the EU.

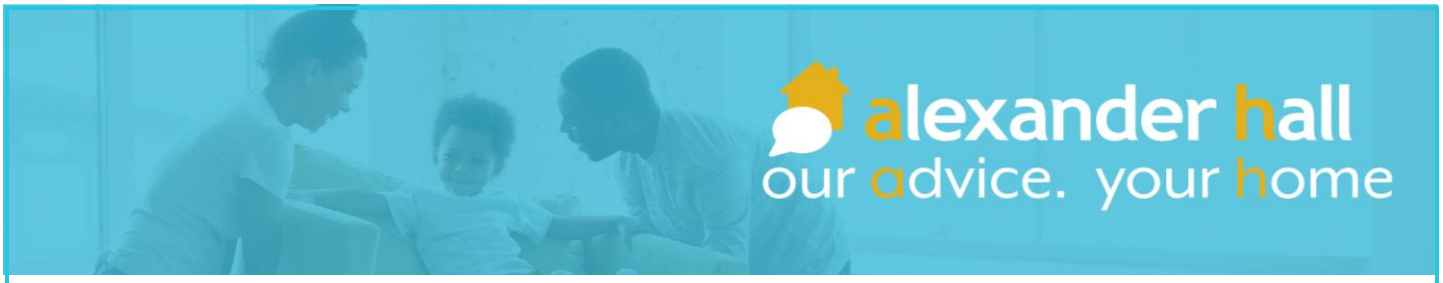


How we use your personal data

In the table below we summarise the ways that we plan to use your personal data and the purposes for which we will use your personal data. We will only use your personal data for the purposes for which we have collected it. If we need to process your personal data for a different purpose that is not compatible with the original purpose that we collected your personal data, we will let you know.

We may process your personal data for a different purpose and without your consent where it is necessary for us to comply with our legal obligations.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To contact you	Identity Contact Financial Transaction Marketing and Communications	Performance of a contract with you Necessary for our legitimate interests (for running our business, to recover debts due to us, to keep our records updated and to study how customers use our products/services)
To carry out our obligations arising from any contracts entered into between you and us and to provide with you the information, products and services you request from us	Identity Contact Financial Health details Transaction Marketing and Communications	Performance of a contract with you Necessary for our legitimate interests (for running our business and to recover debts due to us)
To provide you with information about other goods and services that we offer which we feel may interest you	Identity Contact Technical Usage	Necessary for our legitimate interests (to develop our products/services and grow our business)
To permit selected third parties: • to provide you with information about goods or services which we feel may interest you • to assist us in the improvement and optimisation of advertising, marketing material and content, our services and the website	Identity Contact Technical Usage	Consent (in relation to SMS and email marketing communications) Necessary for our legitimate interests (to develop our service offering)
To assist us in the improvement and optimisation of advertising, marketing material and content, our services and the website	Identity Contact Financial Transaction Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business and provision of administration and IT services)
To notify you about changes to our service	Identity Contact	Performance of a contract with you Necessary to comply with our legal obligations Necessary for our legitimate interests (to keep our records updated)
To ensure that content from our website is presented in the most effective manner for you and your computer	Identity Contact Financial Transaction	Necessary for our legitimate interests (to develop our products/services and grow our business and provision of administration and IT services)



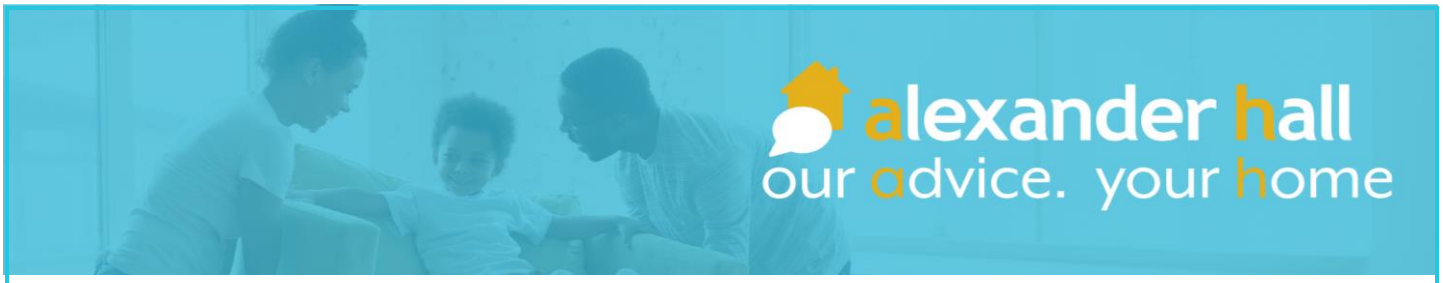
Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To verify your identity	Identity Contact Financial Transaction	Necessary to comply with our legal obligations Necessary for our legitimate interests (for running our business and to prevent fraud and money laundering)
As part of our efforts to keep our site safe and secure and to prevent or detect fraud	Identity Contact Financial Transaction	Necessary to comply with our legal obligations Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)
To use approved technology, including artificial intelligence tools, to support our employees in reviewing information and data, generating summaries, drafting communications and delivering our services.	Identity Contact Financial Transaction Marketing and Communications	Performance of a contract with you Necessary for our legitimate interests in operating and improving our services, administration and IT systems
To provide customer support	Identity Contact	Performance of a contract with you
To comply with the requirements imposed by law or any court order	Identity Contact Technical Usage	Necessary to comply with our legal obligations

Use of Artificial Intelligence

We may use approved artificial intelligence ("AI") technologies to assist our employees with administrative and operational activities, including reviewing information and data, generating summaries, drafting communications and supporting the delivery of our services.

Where personal data is processed using AI technologies, we apply appropriate technical and organisational measures to protect that information. AI technologies are used to support our employees and do not replace their professional judgement or responsibility.

Any material outputs, recommendations or insights generated using AI are subject to appropriate human review before being relied upon or acted upon. We do not use AI systems to make solely automated decisions that produce legal or similarly significant effects on individuals.



How we use Special Category Personal Data

Special Category personal data by its nature requires extra protection. Type of special category personal data we may collect include data concerning a person's health, ethnicity and race, religion, sexual orientation, details of criminal offence / convictions, details about children in households (ages and dates of birth, etc).

Examples of this would be:

- Collecting data in relation to a person's health so that we can process an application with the insurer and demonstrate the most suitable insurance policy has been recommended to the client based on their needs and circumstances, which includes a client's health disclosures.

- Collecting data in relation to a health condition or disability for a client so that our staff can be aware of this and make reasonable adjustments to the service provided to support the additional needs a client may have as a result of this.

We process special category data where we have one of the following additional bases of processing:

Your explicit Consent (Article 9 (2) (a))
For example: you have provided your consent (including by interacting with us)

For the purposes of employment and social security (Article 9 (2) (b) GDPR)
For example, we need to comply with employment law

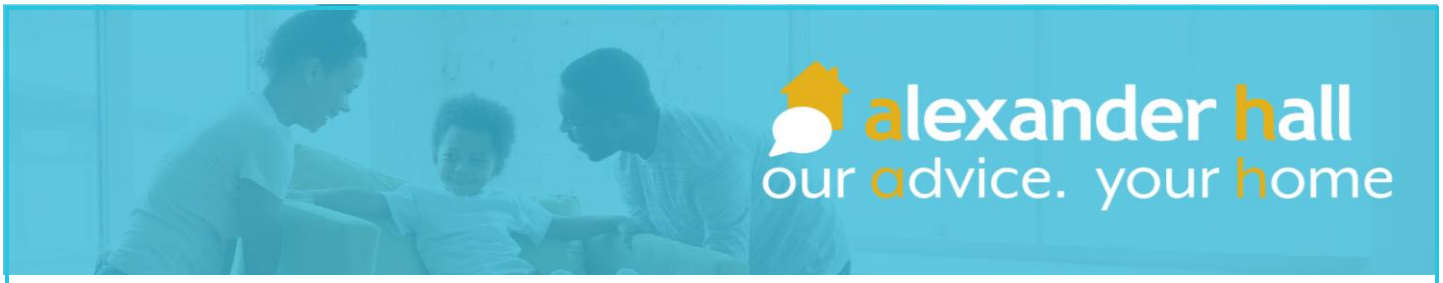
You had already made the personal data publicly available (Article 9 (2) (e) GDPR)
For example, the Electoral Roll or bankruptcy register

To establish, exercise or defend a legal claim (Article 9 (2) (f) GDPR)
For example, where we need to take or defend legal action

Where we have reasonable suspicion of money laundering Schedule 1, Part 2, Paragraph 15 DPA 2018
Suspicion of money laundering:
For example, during our compliance with Anti-Money Laundering laws

We may also process Criminal conviction data under • Schedule 1, Part 3, Paragraph 33 DPA 2018 Legal claims and/or under the list of exemptions under Schedule 2 DPA 2018

We may also use business partners from time to time (for example GB Group Plc) who do collect this type of data about you and you can find more details about this from their privacy policy.



Marketing

You have the right to withdraw your consent for us to use your personal data for marketing purposes at any time. You also have the right to withdraw consent for us to pass your information to third parties for marketing purposes. If you do withdraw your consent, this will result in us ceasing to market goods and services to you.

You can ask us to stop sending you marketing messages at any time by:

- following the opt-out links on any marketing message sent to you; or
- contacting us at any time by emailing DPAconsents@alexanderhall.co.uk or by calling 08000 38 37 36 and asking to speak to the Compliance department.

If you do withdraw your consent to receiving marketing messages, we will still process your personal data in order to fulfil our contract with you and in accordance with our legal, accountancy and regulatory obligations.

If you no longer wish to be contacted by third parties for marketing purposes, please follow the instructions in their marketing communications, or consult their privacy policies about how to unsubscribe.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside Alexander Hall for marketing purposes.

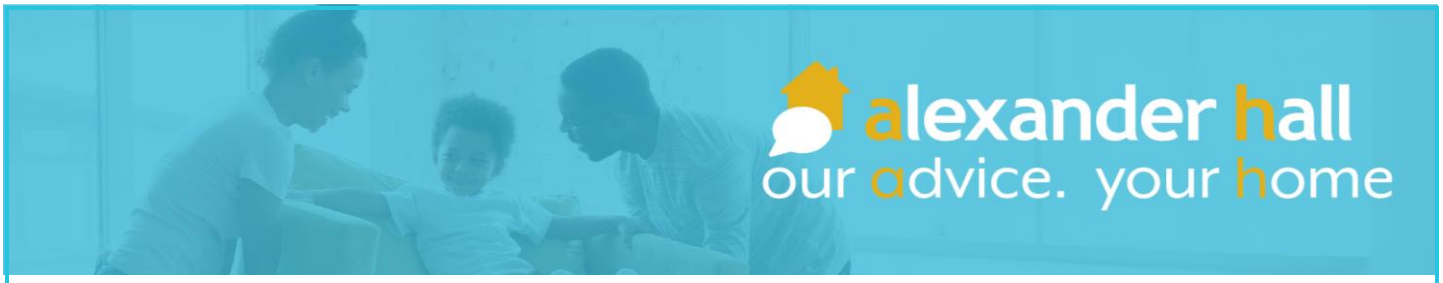
Cookies

The Alexander Hall website and applications may automatically collect data about how you use our services in order to help us improve future functionality. We use Google Analytics, which is a web analysis service provided by Google.

The cookies on the Alexander Hall website do not track, collect or upload data such as your name, email address or billing information, but it may collect data about your equipment and browsing activities. We may collect and report on the adoption and usage of specific features, crashes and exceptions and other useful, anonymous metrics.

Certain devices can detect your approximate location, via latitude and longitude. The accuracy of this data is not in the control of Alexander Hall. If this feature is requested, Alexander Hall will prompt you to provide your permission to access your location data for the purposes of providing you with results or directions based on your current location. You can disable location settings within your browser or app.

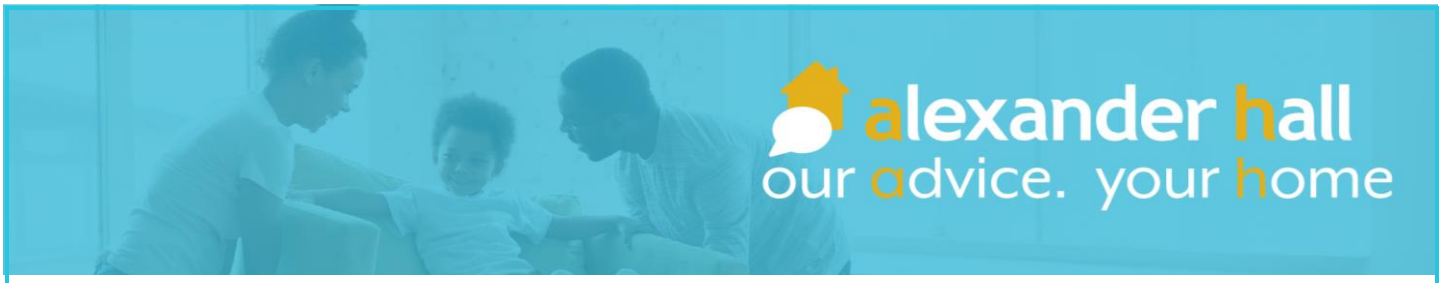
To read more about our use of cookies on the Alexander Hall website, please consult our cookie policy https://www.alexanderhall.co.uk/about/cookies



Disclosures of your Personal Data

We may have to share your personal data with the parties set out below for the purposes set out in the "Purposes for which we will use your personal data" table above. We have agreements in place with our third parties that restrict their use of your personal data. We only allow third parties to use your personal data for specified purposes and in accordance with our instructions.

Category	Explanation
Group Technology Services	Alexander Hall Associates Limited is a subsidiary of Foxtons Group plc. As a result, certain technology services, systems, infrastructure and operational processes may be provided by, or shared with Foxtons Group to enable us to perform our contract with you. Any processing of personal data within the Foxtons Group is carried out in accordance with applicable data protection legislation and appropriate data sharing, confidentiality and security arrangements.
Related Third Parties	Foxtons Estate Agents, but only where you are a Foxtons customer and only to provide general updates on the status of your case (where we have your permission to do so).
External Third Parties	Lenders and insurance companies. Advertisers and advertising networks (including social media) that require the data to select and serve relevant adverts to you. BriefYourMarket (trading name of Nurture Limited), a platform we use to support us with direct marketing to customers who have shown an interest in our products and services. Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accountancy services. FCA, other regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances. 360 Dotnet Ltd, which supplies our customer relationship management and main business operations system. iPipeline and UnderwriteMe, to generate indicative protection quotes, assess product eligibility, and facilitate the secure submission of insurance applications to selected insurance companies. Eligible Limited, which is a communications platform we use to assist with our ongoing servicing of your mortgage and other arrangements. Instamo Limited, a technology platform we use to support us with the efficient processing of mortgage applications to lenders. GB Group Plc, which is our platform for conducting electronic identity verification, anti-money laundering (AML) and other checks to allow us to fulfil our obligations under AML and financial crime regulations.



	DocuSign, which we use for the purpose of obtaining your electronic signature for our Terms of Business. We will refer your personal information to the following third parties, but only where you have consented for us to do so: • MyHomeMove • Conveyan • Uinsure We may also refer your personal information to a range of other third parties, for example to provide associated services which Alexander Hall does not provide directly. Such services are not relevant to all clients and the third-party firms are reviewed from time to time. We will inform you of the firm's identity and obtain your consent prior to referring your personal information.
Other Third Parties	Sometimes there may be third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

Anti-money laundering

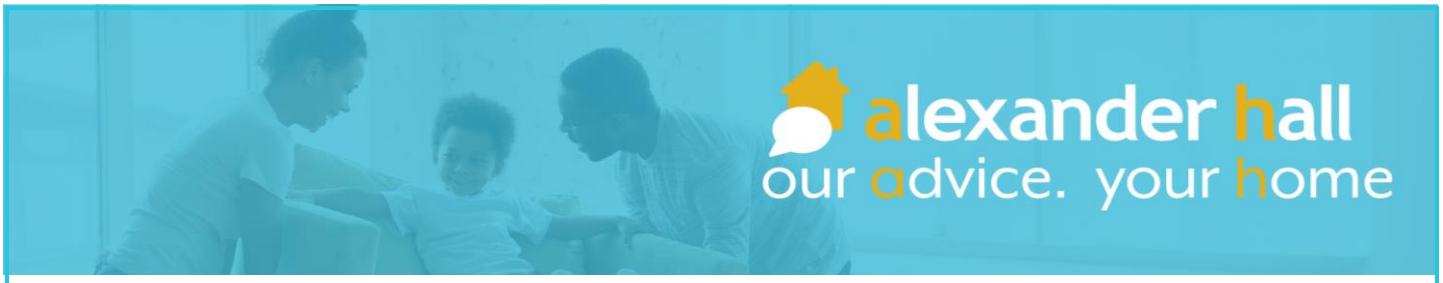
Alexander Hall is committed to operating its business in a transparent and open manner consistent with our legal and regulatory obligations. We are aware that the real estate industry is a target for organised criminals seeking to launder the proceeds of criminal activity. We always seek to prevent this activity by cooperating fully with the authorities and reporting suspicious activity to the National Crime Agency.

As part of this commitment, we adopt a strict compliance of all Anti-Money Laundering rules, with specific emphasis on the Proceeds of Crime Act 2002, the Money Laundering Regulations 2017, the Bribery Act 2010 and the Terrorism Act 2000.

Alexander Hall's policy commitment is applicable to all of our customers. As a result we obtain and hold for a period of at least five years evidence pertaining to our customers' identity and, where appropriate, we obtain proof of ownership of property and source/destination of funds. We will be unable to proceed with any work on behalf of our customers if we are unable to obtain this information. Customers' identity may also be subject to an electronic identity check, which may also include a credit check.

Data Security

Once we have received your personal data we will use reasonable and necessary procedures and security features to try and prevent unauthorised access. For example, we limit who can access your personal data to those individuals and third parties who need to know it and who are subject to a duty of confidentiality. If we become aware of a data breach we will notify the Information Commissioner's Office. If we believe that the data breach is serious, we may notify you in accordance with our legal requirements.



International Transfers

We will not transfer your personal data outside of the European Economic Area, except to a country offering the same level of protection for your personal data. For example, with certain service providers we may use specific contracts approved by the European Commission which ensures that your personal data has the same protection as it would have in Europe.

Data Retention

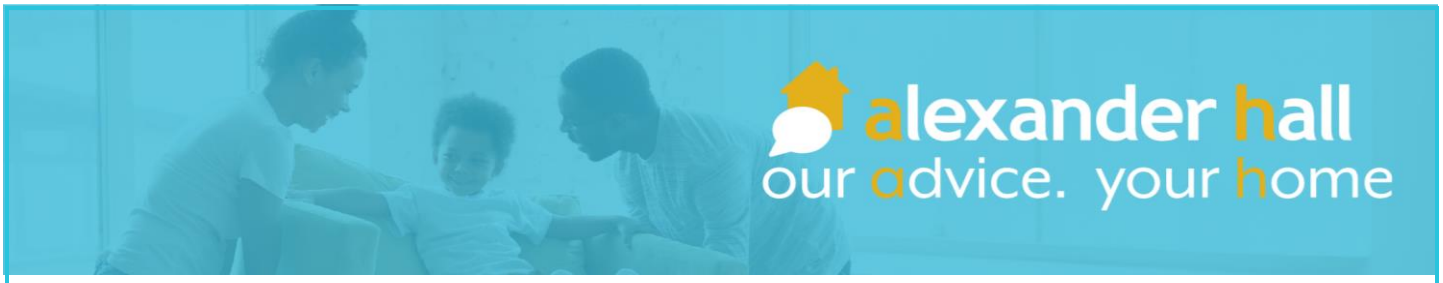
We hold on to your personal data whilst you use our services (or whilst we provide services connected to you) and for at least seventy five years thereafter, for legal, regulatory and accounting purposes. If we need to hold on to your personal data for longer, we take into consideration the potential risks in continuing to store your data against why we might need to keep it. In some circumstances we might anonymise your personal data so it is not associated with you, and we may then use this information indefinitely. Your data will only be held inside the United Kingdom, in line with General Data Protection Regulation and the Data Protection Act 2018. If you do not agree to this, then we will be unable to provide our services to you.

Your Legal Rights

Under data protection laws you have the right to protect and look after your personal data. You have the right to:

- ask us for the personal data that we hold and process about you (this is commonly known as a data subject access request). You have rights to the following information:
    - the purpose(s) for which we are processing your information;
    - the categories of personal information we hold about you
    - the recipients or categories of recipient to whom the personal data have been or will be disclosed;
    - the period for which we will store your information, or the criteria used to determine that period;
- prevent the use of your personal data for marketing purposes by informing a Alexander Hall telephone operator or by ticking the relevant boxes on the data collection forms (please note that even if you refuse marketing, we will still contact you to discuss the services you have asked us to provide to you or to tell you about changes to our terms and conditions);
- ask that any inaccurate information we hold about you is corrected;
- ask that we delete the personal data we hold about you in certain situations;
- ask that we stop using your personal data for certain purposes;
- ask that we do not make decisions about you using completely automated means; and/or
- ask that personal data we hold about you is given to you, or where technically feasible a third party chosen by you, in a commonly used, machine-readable format.

The rights listed above may apply in certain circumstances, and so we may not always be able to comply with your request to exercise these rights. We will usually respond to a request from you to exercise your rights within 1 month of receipt, but it might take longer if your request is particularly complex or if you have made a number of requests.



Please be aware that we may need to process your personal data and/or request specific information from you to help us comply with your request, including obtaining proof of your identity before releasing information to you. You will not usually have to pay a fee to exercise these rights, but we reserve the right to if your request is clearly unfounded, repetitive or excessive, alternatively we may refuse to comply with your request.

Complaints and Feedback

If you would like to speak to us about how we handle your personal data, please contact our Compliance team in the first instance at AHCompliance@alexanderhall.co.uk. You can also complain to the Information Commissioner's Office who is the UK supervisory authority for data protection issues.