



Hestia Ltd (“Hestia”, “we”, “us”, “our”, the “Company”) is committed to protecting and respecting your privacy.

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed, stored and disclosed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting <https://hestia.homes> (the “Site”) or using Hestia’s web application (the “App”) or using any services offered through or associated with our Site or App (the “Services”), you are deemed to have accepted and consented to the practices described in this policy.

The Site is owned and operated by Hestia Ltd (14768018) of Flat 39, 239 Long Lane, London, England, SE1 4PT (our “Company Address”). Hestia processes personal data as a Data Controller, as defined in the Directive and the General Data Protection Regulation (GDPR).

The Site contains links to and from the websites of our partner networks, advertisers and affiliates or to websites shared by other users. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

1. Data We Collect About You

We collect and process personal information so we can provide our Services to you. It’s 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.

The data we collect and process about you is explained in the sections below.

1.1 Data You Give Us

You give us information about you by filling in forms on our Site or App or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you register to use the Site or App, subscribe to our newsletter or use interactive features of our Site or App.

The information you give us includes your name, email, address, phone number, housing and location data.

This data is necessary for our legitimate interests and for us to fulfil our contractual obligations to you, and we rely on this as a lawful basis to use and process the data described above.

1.2 Data We Automatically Collect

Each time you visit or use our Site, we automatically collect the following information:

- Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, location, network data, browser plug-in types and versions, languages, operating system and platform;
- Information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from the Site (including date and time); pages you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.

We use this information as statistical data about your browsing actions and patterns, for system administration, and to evaluate, provide, protect or improve our Services (including by developing new products and services). Because we collect, use and share this information in the aggregate, it does not identify any individual.

2. How We Use Your Data

We use your data to carry out our Site, App and Services in the following ways:

- To provide you with retrofit services, including but not limited to, arranging surveys, performing retrofit modelling services and organising home improvements with installers.
- To administer and manage your account, to provide you with information you request from us, and to carry out any other obligations arising from any contracts entered into between you and us.
- To ensure that content from our Site and App is presented in the most effective manner for you and for your device.
- To allow you to participate in features of our Service when you choose to do so.
- To respond to communications from you and to provide you with information about our Services, including notifying you about changes to our Site, App or Services.

We also use your data to make our Site, App and Services better in the following ways:

- To measure or understand the effectiveness of advertising we serve to you and others, deliver relevant advertising to you and make suggestions and

recommendations to you and other users of the Site and App about goods or services that may interest you or them.

- To administer the Site and App and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.
- As part of our efforts to keep the Site and App safe and secure, e.g. by conducting analysis required to detect malicious data and understand how this may affect your IT system.

3. How We Secure Your Data

All of your personal information is protected and we have put in place appropriate physical, electronic, and management procedures to safeguard and secure the data we collect. Your information is stored on secure cloud databases, internal servers, and on third party softwares. Your information is only accessible by employees who have authorised access rights to such information. Any payment information we may require from you at any point, is encrypted using SSL technology.

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

4. How Long We Store Your Data

We only keep your personal information for as long as it's necessary for our original legitimate purpose for collecting the information and for as long as we have your permission to keep it. We will delete your personal information when you cease to have a customer relationship with us, when you delete your account, or if you request your data to be deleted.

5. Disclosure to Third Parties

5.1 Parties with whom we may share your information

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We may share your information with the following third parties for the following purposes:

Third Party	Data Shared	Purpose
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The Warmfront Team (WFT)	Personal information (email, name, address, other housing data)	To allow WFT to arrange retrofit surveys, and install, on your property
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We require all third parties, including The Warmfront Team (WFT), to respect the security of your personal data and to treat it in accordance with applicable laws. We may share your information with WFT for the purposes of arranging retrofit surveys and installations on your property. If your property is recommended for one or more retrofit installations, WFT may, with your explicit consent, share your data with their trusted installation partners to complete the necessary work. This sharing of data will only occur after we have informed you of the specific installation plan and obtained your consent. We will notify you via your preferred method of communication and provide details on how to give your consent.

For information about the specific installers or to inquire about the data protection practices of our partners, please contact Hestia Homes at info@hestia.homes. We ensure that all our partners, including WFT and their installers, adhere to stringent data protection standards to safeguard your personal information.

The only other circumstances under which we would share your personal data are:

- If the third party is a member of our group (which means any subsidiaries or ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006).
- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If the Company or substantially all of its assets are acquired by a third party, in which case personal data will be one of the transferred assets and the purchaser will be permitted to use the data for the purposes for which it was originally collected by us.
- If we're under a duty to disclose or share your personal data in order to comply with any legal obligation, enforce or apply our Terms & Conditions and other agreements, or to protect the rights, property, or safety of the Company, our customers, or others (including exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction).

5.2 Parties with whom you may choose to share your information

Our Site and App provide users with opportunities to get support with retrofitting homes that they own.

You may choose to share any information, photographs or other content that you

voluntarily submit to the Site or App, either on public forums and public areas of the Site or App or within your private messages. Such data will become available and viewable by other users as controlled by any applicable privacy settings that you define. You can change your privacy preferences through your account settings. Once you have shared your content or made it public, that content may be re-shared by others.

If you choose to connect to social media networks from our Site or App or post any of your content on our Site or App to those networks, then, in accordance with your social media privacy settings, the personal information that you post, transmit, or otherwise make available on the social media platform may be viewed or used by other users of those networks. We have no control over such viewing and use and cannot prevent further use of such information by third parties. When you interact with us through social media networks, you acknowledge that we may access your information that is held by that account, solely in accordance with your social media privacy settings. Any links to social media are not under our control and remain solely your responsibility. You acknowledge that any information posted via social media through our Site or App, or any third party you allow to access your content, is done entirely at your own risk and that by posting to a public platform you make that information visible to third-parties who can use that information at their discretion.

You may review, modify, update, correct or remove any personal data you have submitted to the Site or App at any time. If you remove information that you posted to the Site or App, copies may remain viewable in cached and archived pages of the Site, or if other users or third party APIs have copied or saved that information. Always think carefully before disclosing personal data or other information to other users or otherwise posting personal data on the Site or App. It's important that you're aware that any data you choose to disclose on the Site or App may then be viewed and even used by other users (in accordance with your settings and this Privacy Policy). We do not control the contents of

communications made between users (although you can make a complaint about another user by contacting us using the information provided in the Contact section below).

You must respect the privacy of others and you must not disclose any personal details about other people including your family, friends, acquaintances, or other persons that may be misleading or cause them harm or offence. It is your responsibility to obtain their prior express permission in respect of any submission of their data at any time.

6. Your Rights 6.1 Lawful Bases

We will ensure that your personal data is processed lawfully, fairly, and transparently and that it will only be processed if at least one of the following bases applies:

- You have given your clear consent to the processing of your personal data for a specific purpose.
- Processing is necessary for the performance of a contract to which you are a party (or for us to take steps at your request prior to entering into a contract with you).
- Processing is necessary for our compliance with the law.
- Processing is necessary to protect someone's life.
- Processing is necessary for us to perform a task in the public interest or in the exercise of official authority and the task/function has a clear basis in law.
- Processing is necessary for our legitimate interests or the legitimate interests of a third party, except where there is a good reason to protect your personal data which overrides those legitimate interests, such as allowing us to effectively and efficiently manage and administer the operation of our business, maintaining compliance with internal policies and procedures, monitoring the use of our copyrighted materials, offering optimal, up-to-date security and obtaining further knowledge of current threats to network security in order to update our security.

6.2 Data Subject Rights

Under the GDPR, you have the right to:

- Withdraw your consent to the processing of your personal data at any time. Please note, however, that we may still be entitled to process your personal data if we have another legitimate reason for doing so (such as to comply with a legal obligation).
- Be informed of what data we hold and the purpose for processing the data, as a whole or in parts.
- Be forgotten and, in some circumstances, have your data erased by ourselves and our affiliates (although this is not an absolute right and there may be circumstances where you ask us to erase your personal data but we are legally entitled to retain it).
- Correct or supplement any information we hold about you that is incorrect or incomplete.
- Restrict processing of the information we hold about you (for example, so that inaccuracies may be corrected—but again, there may be circumstances where you ask us to restrict processing of your personal data but we are legally entitled to refuse that request).
- Object to the processing of your data.

- Obtain your data in a portable manner and reuse the information we hold about you.
- Challenge any data we use for the purposes of automated decision-making and profiling
(in certain circumstances—as above, there may be circumstances where you ask us to restrict our processing of your personal data but we are legally entitled to refuse that request).
- Complain to a supervisory authority (e.g. the Information Commissioner's Office (ICO) in the UK) if you think any of your rights have been infringed by us. (We would, however, appreciate the chance to address your concerns, so please contact us prior to taking this step).
You will not have to pay a fee to access your personal data (or to exercise any of the other rights) unless your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We will not send you any unsolicited marketing or spam and will take all reasonable steps to ensure that we fully protect your rights and comply with our obligations under applicable data protection laws. You have the right to ask us not to process your personal data for marketing purposes. We will get your express opt-in consent before we use your data for such purposes or share your personal data with any third parties for such purposes, but you can exercise your right to prevent such processing by contacting us at the Company Address, via email at info@hestia.homes, or by unsubscribing using the links contained in the marketing emails.

You may revoke your consent for us to use your personal data as described in this Privacy Policy at any time by emailing us at info@hestia.homes, and we will delete your data from our systems. To enforce any of the above rights, please contact us at our Company Address or via email at info@hestia.homes.

Cookies

A cookie is a small file of letters and numbers that we store on your browser. Cookies contain information that is transferred to your computer's hard drive (or the hard drive of another relevant device). We use cookies to distinguish you from other users on the Site, to tailor your experience to your preferences, and to help us improve the Site.

Some of the cookies we use are essential for the Site to operate. If you use your browser settings to block all cookies (including essential cookies), you may not be able to access all or parts of our Site.

Before any non-essential cookies are placed on your device, you will be shown a pop-up message requesting your consent to setting those cookies. By default, most internet browsers accept cookies, but you can choose to enable or disable some or

all cookies via the settings on your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third party cookies. For further details, please consult the help menu in your internet browser.

We use the following cookies:

- **Strictly necessary cookies.** These cookies are required to save your session and to carry out other activities that are strictly necessary for the operation of the Site. They include, by way of general example, cookies that enable you to log into secure areas of the Site, use a shopping cart, or make use of e-billing services. These cookies are session cookies, which means they're temporary and will expire when you close your browser.
- **Analytical/performance cookies.** These cookies allow us to recognise and count the number of visitors and to see how visitors move around the Site when they're using it. These cookies help us improve the way the Site works by, for example, ensuring that users are finding what they're looking for easily.
- **Functionality cookies.** These cookies are used to recognise you when you return to the Site. They enable us to personalise our content for you, greet you by name and remember your preferences.
- **Targeting cookies.** These cookies record your visit to the Site, the pages you visit, and the links you follow. We use this information to make the Site and the advertising displayed on it more relevant to your interests. We also share this information with third parties for the same purpose.
- **Social Media cookies.** These cookies work together with social media plug-ins. For example, when we embed photos, video and other content from social media websites, the embedded pages contain cookies from these websites. Similarly, if you choose to share our content on social media, a cookie may be set by the service you have chosen to share content through.

You have the right to opt out of social media cookies and third-party cookies. To enforce either of these rights please contact us at info@hestia.homes.

Changes To Our Privacy & Cookie Policies

Any changes we may make to our Privacy & Cookie Policies in the future will be posted on this page and, where appropriate, notified to you by email. You will be deemed to have accepted the terms of the updated Privacy & Cookie Policies on your first use of the Site or App following the alterations. Please check back frequently to see any updates or changes to our Privacy & Cookie Policies.

Contact

Questions, comments and requests regarding this Privacy & Cookie Policy are welcomed and should be addressed to our Company Address or to our email at info@hestia.homes
