

PRIVACY POLICY

Updated 28/01/2026

White Estates is committed to protecting and respecting your privacy.

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purpose of UK data protection law, the data controller is White Estates.

Information we collect from you

We will collect and process the following data about you:

- **Information you give us.** This is information about you that you give us by filling in forms on our website (**our site**) or by corresponding with us by phone, e-mail or otherwise.
- **Information we collect about you.** With regard to each of your visits to our site we may automatically collect the following information:

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet; and
- information about your visit.

Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them see our cookie policy.

Uses made of the information

We use information held about you in the following ways:

- **Information you give to us.** We will use this information:
 - to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
 - to provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;

- to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you. If you are an existing customer, we will only contact you by electronic means (e-mail or SMS) with information about goods and services similar to those which were the subject of a previous sale or negotiations of a sale to you.;
- to notify you about changes to our service;
- to ensure that content from our site is presented in the most effective manner for you and for your computer.
- **Information we collect about you.** We will use this information:
 - to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
 - to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
 - to allow you to participate in interactive features of our service, when you choose to do so;

- as part of our efforts to keep our site safe and secure;
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.
- **Information we receive from other sources.** We will combine this information with information you give to us and information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

Disclosure of your information

You agree that we have the right to share your personal information with:

- Any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.

We will disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.
- If we or substantially all of our assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of us, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

Where we store your personal data

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It will also be processed by staff operating outside the EEA who work for us or for one of our suppliers. This includes staff engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree

to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; 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.

Your rights

You have the right to tell us not to use your personal information for marketing purposes. You can exercise this right by unsubscribing using the link in any of the marketing emails we send you.

UK data protection law also gives you the right to access your personal information, to object to the use of your personal information for certain purposes, and the right to erase, restrict or receive a machine-readable copy of your personal information. You can exercise any of these rights by contacting us at the address above.

We will comply with the law in responding to your requests. That means that there may be some legal reasons why we cannot comply with all requests.

Changes to our privacy policy

Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

Contacting us

If you have any questions about this privacy policy or the way we handle your personal information, please contact us at the address in the 'contact us' section of this website.

We hope that we will be able to answer any questions or concerns that you have. You have the right at any time to raise your concern with the Information Commissioner's Office at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

CANDIDATE PRIVACY POLICY

The Company is committed to protecting the personal data of its job applicants. This Policy sets out important information about how the Company ("we" or "us") collect and use your personal

data during the course of the application and recruitment process.

Scope

This Policy applies to job applicants located in the UK.

What Personal data do we collect?

Personal data means information which identifies you and relates to you as an individual. As your prospective employer or to engage you as a client employee, we will collect, use and store your personal data for a wide variety of reasons in connection with the application and recruitment process. We have set out below the main categories of candidate personal data which we process in connection with our recruiting activities on a day to day basis:

- personal contact information (including your name, home address, personal telephone number(s) and personal e-mail address)
- work history and other relevant experience including information contained in CV, cover letter or job application form
- education information including degrees awarded, transcripts and other information provided in support of the job application
- remuneration history
- National Insurance number
- Driving licence details
- information collected during phone screenings and interviews
- details regarding the type of employment sought, desired salary, willingness to

relocate, job preferences, and other information related to remuneration and benefits

- reference information and information received from background checks (where applicable) including information provided by third parties
- information related to previous applications to us or previous employment history with us
- documents evidencing your right to work (including information about your immigration status where relevant)
- date of birth
- gender

The majority of the personal data to be provided by you is mandatory in connection with our recruiting activities. Failure to provide mandatory personal data may affect our ability to accomplish the purposes stated in this Policy, including considering your suitability for employment and/or entering into an employment contract with you or contract for services.

The majority of the personal data which we process will be collected directly from you. However, your personal data may also be provided to us by third parties, such as recruitment agencies, former employers, official bodies (such as regulators or criminal record bureaus), and/or medical professionals.

Referencing and vetting

As part of our referencing and vetting procedures, we will contact certain third parties in order to verify your personal information (including personal information that you provide as part of the application and recruitment process). These third parties will include:

- Specialist background vetting providers to conduct referencing and vetting procedures on our behalf and/or to assist with the process of obtaining the relevant signed documentation from you
- these specialist background vetting providers and/or we will contact former employers in order to verify your previous employment history
- these specialist background vetting providers and/or we will contact universities and/or other establishments for higher education that you attended in order to verify your education history
- credit reference agencies will be contacted for certain roles including those roles that are regulated

We will only seek this information in relation to successful candidates that have accepted a conditional offer of employment, or a conditional offer of a position as a client employee, with us and we will specifically inform such candidates that we will be contacting these third parties in advance of doing so.

How do we use your Personal data?

We use your personal data for a variety of purposes in order to take steps necessary to enter into an employment contract or working relationship with you, to comply with legal obligations or otherwise in pursuit of its legitimate business interests. We have set out below the main purposes for which candidate personal data is processed:

- to identify and evaluate job applicants, including assessing skills, qualifications and experience
- verifying candidate information and carrying out employment, background and reference checks, where applicable and in order to prevent fraud
- to comply with our legal, regulatory, or other corporate governance requirements

In addition to using your personal data to consider you for the role you applied for, we will retain and process your personal data to inform you about and to consider you for other roles that may be appropriate for you. If you do not want us to consider you for other roles which we consider may be appropriate for you, please inform us.

What special categories of personal data do we process?

Certain categories of data are considered "special categories of personal data" and are subject to additional safeguards. We limit the special categories of personal data which it processes as follows:

- Health Information

We may process information about a candidate's physical or mental health in compliance with our obligations owed to disabled employees and/or candidates, in particular:

We will always treat information about health as confidential and it will only be shared internally where there is a specific and legitimate purpose to do so. We have implemented appropriate physical, technical, and organisational security measures designed to secure your personal data against accidental loss and unauthorised access, use, alteration, or disclosure.

If a candidate is successful, any health information processed as part of the recruitment process that is relevant to our compliance with its obligations in connection with employment will be retained and processed in accordance with the Employee and Client Employee Privacy Policy.

If a candidate is unsuccessful, any health information obtained as part of recruitment process will be deleted with the rest of the candidate's personal data within 12 months of their rejection.

- Criminal Record Information

In some cases we are required to carry out these checks (for example, for regulated roles); in all cases, we carry out the checks in accordance with the applicable law.

We will always treat criminal record history as confidential and it will only be shared internally where there is a specific and legitimate purpose to do so. We have implemented appropriate physical, technical, and organizational security measures designed to secure your personal data against accidental loss and unauthorized access, use, alteration, or disclosure.

Criminal record information will be deleted once the recruitment process has been completed, subject to any exceptional circumstances and/or to comply with particular laws or regulations. Criminal record information will typically be retained for a maximum of 6 months, although the outcome of any check will remain on the employee's record.

When do we share candidate personal data?

We will share candidate personal data with other parties only in limited circumstances in order to take steps necessary to enter into the employment contract or where necessary to comply

with a legal obligation, or otherwise in pursuit of its legitimate business interests as follows:

- recruitment agencies
- background vetting specialists
- occupational health providers
- HMRC and/or any other applicable government body
- accountants, lawyers and other professional advisers
- the Financial Conduct Authority and/or the Prudential Regulatory Authority
and/or any other applicable regulatory body

For how long will my personal data be retained?

Our policy is to retain personal data only for as long as needed to fulfil the purpose(s) for which it was collected, or otherwise as required under applicable laws and regulations. Under some circumstances we may anonymise your personal data so that it can no longer be associated with you. We reserve the right to retain and use such anonymous data for any legitimate business purpose without further notice to you

For unsuccessful candidates:

- We will typically retain personal data collected during the recruitment process for a maximum period of 2 years from the date of application subject to any exceptional circumstances and/or to comply with particular laws or regulations. ;
- We may retain select data relating to particular candidates on file in order to follow up with the candidates in relation to future vacancies; if you do not wish for your personal data to be maintained on file for this purpose, please inform us.

If you are offered and accept employment or a position as a client employee with us, the personal data we collected during the application and recruitment process may become part of your record and we may use it in connection with your employment or working relationship in accordance with the Employee and client employee Privacy Policy which will be made available to you upon commencement of your employment with us.

What are my rights in relation to my personal data?

We will always seek to process your personal data in accordance with its obligations and your rights.

In certain circumstances, you have the right to seek the erasure or correction of your personal data, to object to particular aspects of how your data is processed, and otherwise to seek the restriction of the processing of your personal data.

Contacting us

If you have any questions about this privacy policy or the way we handle your personal information, please contact us at the address in the 'contact us' section of this website.

We hope that we will be able to answer any questions or concerns that you have. You have the right at any time to raise your concern with the Information Commissioner's Office at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.