

Privacy Policy – Wider Stakeholders

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Introduction

We are committed to protecting the privacy and security of your personal data. This policy explains how we collect and use your personal data. It will list the rights you have whilst we use your data.

This policy applies to all wider stakeholders who are not customers, employees, or prospective employees of the Persimmon Group. It is not part of any contract. We may vary, amend, alter, or replace this notice at any time.

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Who We Are

Persimmon PLC, “we”, “us” are the data controller of your personal data. This means that we decide how we use the personal data that we need to hold for our relationship with you.

Our registered address is:

Persimmon House
Fulford
York
YO19 4FE

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Data Protection Officer's (DPO) Contact Details

You can contact the DPO by post at the above registered address, marking the envelope FAO: Data Protection Officer. Alternatively, you can contact our Data Protection Officer (DPO) by email at plc.gdprinfo@persimmonhomes.com.

If you have any questions about this policy, or how we handle your personal data, please contact the DPO.

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Types of Data We Collect

Personal data is any information that identifies someone, or information about someone who is already identified. There are “special categories” of sensitive personal data which require a higher level of protection, but we do not currently process this about you. If this changes, we will revise this policy accordingly.

We may process the following categories of data when you engage with us:

Identity Data – Your name, title, gender, nationality, national ID, date of birth, and shareholder reference number.

Contact Data – Your postal address, email address, and phone number.

Recording Data – Videos, photographs, and audio recordings that may be captured at shareholder meetings.

Financial Data – Your bank details, tax number, and history of past payments.

Share and Investment Data – Number of shares held, share classes, voting decisions, power of attorney details, and mailing preferences.

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What Happens if You Do not Provide Data

If you do not provide us with certain data, we may not be able to meet our obligations to you. For example, if you are a shareholder, without your address, we may not be able to communicate with you about your shares.

As a result, we may not be able to work with you as a stakeholder if you do not provide certain information.

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The Reasons We Process Your Data

The types of data we collect can vary based on how you engage with us. The following tables outline the reasons we process your data and the legal basis for those reasons.

Records and Administration.

Reason	Types of Data	Legal Basis
Contacting you	<ul style="list-style-type: none"> • Identity Data • Contact Data 	<ul style="list-style-type: none"> • Legal Obligation – Companies Act 2006 • Legitimate Interest – Ensuring effective shareholder engagement and communications
Maintaining shareholder records	<ul style="list-style-type: none"> • Identity Data • Contact Data • Share and Investment Data 	<ul style="list-style-type: none"> • Legal Obligation – Companies Act 2006
Responding to shareholder queries and complaints	<ul style="list-style-type: none"> • Identity Data • Contact Data • Share and Investment Data 	<ul style="list-style-type: none"> • Legal Obligation – Companies Act 2006 • Legitimate Interest – Providing responsive and effective investor relations
Facilitating shareholder meetings & voting	<ul style="list-style-type: none"> • Identity Data • Contact Data • Share and Investment Data 	<ul style="list-style-type: none"> • Legal Obligation – Companies Act 2006 • Legitimate Interest – Ensuring proper governance and shareholder participation
Recording shareholder meetings	<ul style="list-style-type: none"> • Recording Data 	<ul style="list-style-type: none"> • Legitimate Interest – Ensuring proper governance and shareholder participation
Paying dividends	<ul style="list-style-type: none"> • Identity Data • Contact Data • Financial Data • Share and Investment Data 	<ul style="list-style-type: none"> • Legal Obligation – Companies Act 2006 • Contractual Obligation – payment of shareholders

Communicating corporate actions (e.g., mergers, takeovers)

- Identity Data
- Contact Data
- Share and Investment Data

- **Legal Obligation** – Companies Act 2006, Market Abuse Regulations (UK MAR)
- **Legitimate Interest** – Keeping shareholders informed of significant corporate events

Legal, Security, and Compliance

Reason	Types of Data	Legal Basis
Preventing fraud, money-laundering, bribery, or other illegal acts	<ul style="list-style-type: none"> • Identity Data • Financial Data • Share and Investment Data 	<ul style="list-style-type: none"> • Legal Obligation – Companies Act 2006; Proceeds of Crime Act 2002; Bribery Act 2010.
Protecting IT systems from unauthorised access	<ul style="list-style-type: none"> • Identity Data • Contact Data 	<ul style="list-style-type: none"> • Legitimate Interest - ensuring the safety and security of our IT systems.
Complying with legal and regulatory obligations	<ul style="list-style-type: none"> • Identity Data • Financial Data • Share and Investment Data 	<ul style="list-style-type: none"> • Legal Obligation – Companies Act 2006; UK GDPR; Financial Conduct Authority (FCA) Rules
Ensuring compliance with financial sanctions	<ul style="list-style-type: none"> • Identity Data • Financial Data 	<ul style="list-style-type: none"> • Legal Obligation – Sanctions and Anti-Money Laundering Act 2018
Reporting to tax authorities	<ul style="list-style-type: none"> • Identity Data • Financial Data • Share and Investment Data 	<ul style="list-style-type: none"> • Legal Obligation – Income Tax (Trading and Other Income) Act 2005; HMRC Regulations
Managing and defending legal claims	<ul style="list-style-type: none"> • Identity Data • Contact Data • Financial Data • Share and Investment Data 	<ul style="list-style-type: none"> • Legal Obligation – Limitations Act 1980 • Legitimate Interest – Protecting the company’s legal rights and defending against claims

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Informing Us of Changes

It is important that the personal information we hold about you is correct. Please keep us informed if your personal information changes during your relationship with us.

If you hold shares in your own name, you can update your details through our registrar, Computershare, through their website www.investorcentre.co.uk/. If you hold them via a nominee (e.g., a stockbroker or platform), please contact your nominee.

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Your Rights

Under data protection law, you have the following rights:

- The **right to be informed** about the data we hold and what we do with it
- The **right of access** to the data we hold, including receiving a copy of it
- The **right to correct inaccuracies** in the data we hold, rectifying it
- The **right to be forgotten** allowing you to ask us to delete or erase data in certain circumstances
- The **right to restrict** our processing of your data when you want us to verify it is accurate or our reason for processing it
- The **right to transfer** your data to another party where we hold it with your consent or for a contract we hold with you. This is also known as 'portability'
- The **right to object** to us processing your data where we use it for our legitimate interests
- Rights relating to any **automated decision-making and profiling** of your personal data.

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Who We Share Your Data With

We will share your data internally with Persimmon Group employees, but only when they need it to carry out their responsibilities.

We may share your data with third parties, depending on the type of data. We may also share it as part of a company sale, restructure, or to meet any legal obligations we have.

When we share your data, we make sure third parties handle it responsibly, follow the law, and prioritise its security.

The following table shows the categories of third parties, what data we share, and why we share it with them:

Third Parties	Categories of Data	Reasons for Sharing
Registrar	<ul style="list-style-type: none"> • Identity Data • Contact Data • Financial Data • Share and Investment Data 	<ul style="list-style-type: none"> • Managing shareholder records, meetings, voting, and communications
Design Agency	<ul style="list-style-type: none"> • Identity Data • Share and Investment Data 	<ul style="list-style-type: none"> • Designing and distributing annual report and other correspondence.
Regulatory Bodies (e.g., HMRC, FCA, etc.)	<ul style="list-style-type: none"> • Identity Data • Contact Data • Financial Data • Share and Investment Data 	<ul style="list-style-type: none"> • Legal and regulatory compliance (e.g., tax, shareholder records)
Law Enforcement and Fraud Prevention Agencies	<ul style="list-style-type: none"> • Identity Data • Contact Data • Financial Data • Share and Investment Data 	<ul style="list-style-type: none"> • Fraud prevention and legal compliance
Third Parties Making a Valid Request to inspect or copy our register of members Under Section 116 of the Companies Act	<ul style="list-style-type: none"> • Identity Data • Contact Data 	<ul style="list-style-type: none"> • Providing shareholder details for a proper purpose (e.g., transparency, governance)

Third Parties	Categories of Data	Reasons for Sharing
Consultants, Lawyers, Legal Professionals	<ul style="list-style-type: none"> • Identity Data • Contact Data • Financial Data 	<ul style="list-style-type: none"> • Legal advice and compliance
Auditors	<ul style="list-style-type: none"> • Identity Data • Contact Data • Financial Data • Share and Investment Data 	<ul style="list-style-type: none"> • Audits and reporting
IT Partners	<ul style="list-style-type: none"> • Identity Data • Contact Data 	<ul style="list-style-type: none"> • Cybersecurity and system protection

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Transferring Data Outside of the United Kingdom

We may store or transfer some of your personal data to countries outside the United Kingdom. These countries may not have data protection laws as robust as those in the UK. To ensure your data stays secure, we take extra steps to protect it to the same standards it would have in the UK.

These transfers happen when we share your data with 'international organisations,' like Microsoft, which are based across several countries. We have put in place contractual clauses with these organisations to safeguard your personal data and ensure they handle it per UK data protection laws.

In addition, we rely on Adequacy Decisions from the Information Commissioner's Office, which recognise certain countries outside the UK as having adequate data protection levels. We base some data transfers on these decisions.

If you would like a copy of these safeguards, please email us at plc.gdprinfo@persimmonhomes.com.

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How Long We Keep Your Data

We keep your data only for as long as necessary. To decide how long we keep your data, we consider its nature, sensitivity, how much of it we hold, and the potential risk to you if it is misused or disclosed. We also consider why we collected it, and any legal requirements.

When we no longer need your data, we will delete any electronic data from our IT systems and securely destroy any physical copies. If you want to know the specific retention period, please contact plc.gdprinfo@persimmonhomes.com.

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Automated Decision-Making

Automated decision-making means making decisions about you with no human involvement, like automatic face-scanning only using a computer. We do not make any important decisions about you this way, but we will update this notice if this changes.

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Updates to this Notice

To make sure we always tell you about how and why we use your data, we routinely update this policy. Updates might be needed, for instance, if we change how we work and it affects your data.

We will adjust the 'Last Updated' date at the top of the document. Please review the policy from time to time for any changes.

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Making a Complaint

We are dedicated to achieving high standards in all our data processing. We hope that you never need to make a complaint about our data processing, and we do our best to ensure that we always act correctly. However, if you wish to make a complaint, you can do so by contacting our DPO using the details provided above.

If you still feel we have not respected your data rights, you can file a complaint with the Information Commissioner's Office (ICO), the U.K. regulatory authority for data protection.

You can contact the ICO at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF; by calling 0303 123 1113 (local rate) or 01625 545 745; or submitting a complaint online here: <https://ico.org.uk/make-a-complaint/>.

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