



JHL Homes Ltd

Website Privacy Policy

Last updated: October 2026

1. Introduction

JHL Homes Ltd (“JHL Homes”, “we”, “us”, “our”) understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who deals with us — including property sellers, investors and buyers, professional associates, and visitors to our website (www.jhlhomes.co.uk, “our Site”) — and will only collect and use personal data in the ways described in this policy and in a way that is consistent with our obligations and your rights under the UK General Data Protection Regulation (“UK GDPR”), the Data Protection Act 2018 and the Data (Use and Access) Act 2025 (together, “the Regulation”). We will always treat your personal data with the utmost respect.

By providing your personal data, you confirm that you are over 18 years of age and can legally access the services provided by JHL Homes.

For the purposes of the Regulation, JHL Homes Ltd is the data controller and is registered with the Information Commissioner’s Office (ICO) as such, with registration number **ZC223743**. Our entry can be viewed on the ICO’s public register of fee payers at ico.org.uk.

1.1 Roles and responsibilities

Data Protection Officer	Linda Mulholland, Director
Email	linda@jhlhomes.co.uk
Telephone	07891 539539
In writing	JHL Homes Ltd, Sycamore House, Maltongate, Langtoft, YO25 3TW

Please read this policy carefully and make sure that you understand it. Your acceptance of this policy is deemed to occur when you first use our Site or provide your personal data to us. If you do not accept and agree with this policy, you must stop using our Site and should not provide your personal data to us.

If you are not happy with any aspect of how we obtain, hold or use your personal data, you have the right to make a complaint to the Information Commissioner’s Office (www.ico.org.uk). We would, however, prefer that you contact us first and give us the opportunity to resolve any issue that you might have.

The Regulation defines “personal data” as any information relating to an identified or identifiable living individual (a “data subject”). An identifiable individual is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data or an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that individual.

This policy sets out the procedures to be followed when dealing with personal data. These procedures and principles must be followed at all times by JHL Homes and by any employee, agent, contractor or other party working on behalf of JHL Homes.

JHL Homes is committed not only to the letter of the law but also to its spirit, and places a high premium on the correct, lawful and fair handling of all personal data, respecting the legal rights, privacy and trust of every individual we deal with.

1.2 Summary

JHL Homes will at all times:

- Be transparent about what information we collect, why we collect it, how and where we store it, what we do with it, and when and how we dispose of it
- Have measures in place to protect your personal data and keep it secure
- Respect your rights under the Regulation and aim to give you control over your own personal data
- Stop communicating with you if you ask us to

2. The data protection principles

This policy aims to ensure compliance with the Regulation, which sets out the following principles with which any party handling personal data must comply. All personal data must be:

- a) Processed lawfully, fairly and in a transparent manner in relation to the data subject.
- b) Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes. Further processing for archiving in the public interest, scientific or historical research, or statistical purposes shall not be considered incompatible with the initial purposes.
- c) Adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed.
- d) Accurate and, where necessary, kept up to date. Every reasonable step must be taken to ensure that personal data that is inaccurate is erased or rectified without delay.
- e) Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which it is processed, subject to the appropriate technical and organisational measures required by the Regulation to safeguard the rights and freedoms of the data subject.
- f) Processed in a manner that ensures appropriate security, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

3. Lawful, fair and transparent data processing

The Regulation seeks to ensure that personal data is processed lawfully, fairly and transparently, without adversely affecting the rights of the data subject. Processing of personal data is lawful if at least one of the following applies:

- a) The data subject has given consent to the processing of their personal data for one or more specific purposes.
- b) Processing is necessary for the performance of a contract to which the data subject is a party, or to take steps at the request of the data subject before entering into a contract.
- c) Processing is necessary for compliance with a legal obligation to which JHL Homes is subject — for example, our obligations under the Money Laundering Regulations 2017.
- d) Processing is necessary to protect the vital interests of the data subject or of another individual.
- e) Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority.
- f) Processing is necessary for the purposes of the legitimate interests pursued by JHL Homes or by a third party, except where those interests are overridden by the fundamental rights and freedoms of the data subject, in particular where the data subject is a child.

4. Processed for specified, explicit and legitimate purposes

4.1 JHL Homes collects and processes the personal data set out in section 21 of this policy. This includes personal data received directly from data subjects (for example, contact details provided when you contact us, or documents you upload to your client folder) and data obtained from third parties (for example, identity verification results from Landmark, or title information from HM Land Registry).

4.2 JHL Homes only processes personal data for the specific purposes set out in section 21 of this policy (or for other purposes expressly permitted by the Regulation). The purposes for which we process personal data are provided to data subjects in our Terms of Business and Data Capture Form, or via a link to this policy, at the time their personal data is collected — or, where data is obtained from a third party, as soon as possible and in any event no more than one calendar month after collection.

4.3 A copy of this policy is available at any time on our website, www.jhlhomes.co.uk, via the link at the bottom of each page, or on request from linda@jhlhomes.co.uk.

5. Adequate, relevant and limited data processing

JHL Homes will only collect and process personal data to the extent necessary for the specific purpose(s) made known to data subjects under section 4 above.

6. Accuracy of data and keeping data up to date

JHL Homes shall ensure that all personal data collected and processed is kept accurate and up to date. The accuracy of data shall be checked when it is collected and at 12-monthly intervals thereafter, including a review of client records held in Zoho CRM. Where inaccurate or out-of-date data is found, all reasonable steps will be taken without delay to amend or erase it, as appropriate.

7. Data retention

JHL Homes shall not keep personal data for any longer than is necessary in light of the purposes for which it was originally collected and processed. When the data is no longer required, all reasonable steps will be taken to erase it without delay.

Full details of our approach to data retention, including retention periods for specific types of personal data, are set out in the Data Retention Schedule in section 31 of this policy.

8. Secure processing

JHL Homes shall ensure that all personal data collected and processed is kept secure and protected against unauthorised or unlawful processing and against accidental loss, destruction or damage. Details of the data protection and organisational measures we take are set out in sections 22 to 27 of this policy.

9. Accountability

9.1 JHL Homes' Data Protection Officer is Linda Mulholland, Director and Data Protection Officer — linda@jhlhomes.co.uk.

9.2 The Data Protection Officer is responsible for overseeing the implementation of this policy and for monitoring compliance with this policy, JHL Homes' other data protection-related policies, and the Regulation.

9.3 JHL Homes shall keep written internal records of all personal data collection, holding and processing, which shall include:

- a) The name and details of JHL Homes, its Data Protection Officer, and any third-party data processors (see the systems table in section 17).
- b) The purposes for which JHL Homes processes personal data.

- c) The categories of personal data collected, held and processed, and the categories of data subject to which that personal data relates.
- d) Details (and categories) of any third parties that will receive personal data from JHL Homes.
- e) Details of any transfers of personal data outside the UK, including the mechanisms and security safeguards in place.
- f) How long personal data will be retained by JHL Homes.
- g) Descriptions of the technical and organisational measures taken by JHL Homes to ensure the security of personal data.

10. Data protection impact assessments

JHL Homes shall carry out a Data Protection Impact Assessment (DPIA) for any new project or new use of personal data that involves new technology and is likely to result in a high risk to the rights and freedoms of data subjects — for example, introducing a new CRM, website enquiry form or automated marketing system.

DPIAs shall be overseen by the Data Protection Officer and shall address:

- a) The types of personal data that will be collected, held and processed.
- b) The purpose(s) for which the personal data will be used.
- c) JHL Homes' objectives.
- d) How the personal data is to be used.
- e) Any parties (internal or external) who are to be consulted.
- f) The necessity and proportionality of the processing with respect to its purpose(s).
- g) Risks posed to data subjects.
- h) Risks posed both within and to JHL Homes.
- i) Proposed measures to minimise and handle the risks identified.

11. The rights of data subjects

The Regulation gives data subjects the following rights (please refer to the sections indicated for further details):

- a) The right to be informed (section 12)
- b) The right of access (section 13)
- c) The right to rectification (section 14)
- d) The right to erasure, also known as the "right to be forgotten" (section 15)
- e) The right to restrict processing (section 16)
- f) The right to data portability (section 17)
- g) The right to object (section 18)
- h) Rights with respect to automated decision-making and profiling (sections 19 and 20)

12. Keeping data subjects informed

12.1 JHL Homes shall ensure that the following information is provided to every data subject when personal data is collected:

- a) Details of JHL Homes, including the identity of Linda Mulholland, Director, as its Data Protection Officer.
- b) The purpose(s) for which the personal data is being collected and will be processed (as detailed in section 21) and the legal basis for that processing.
- c) Where applicable, the legitimate interests on which JHL Homes relies for the processing.
- d) Where the personal data is not obtained directly from the data subject, the categories of personal data collected and processed.
- e) Where the personal data is to be shared with one or more third parties, details of those parties.

- f) Where the personal data is to be transferred to a third party located outside the UK, details of that transfer and the safeguards in place (see section 28).
- g) How long the personal data will be held (or, where there is no predetermined period, how that period will be determined).
- h) Details of the data subject's rights under the Regulation.
- i) Details of the data subject's right to withdraw their consent to processing at any time.
- j) Details of the data subject's right to complain to the Information Commissioner's Office.
- k) Where applicable, details of any legal or contractual requirement to provide the personal data, and the consequences of not providing it — for example, that we cannot act for a client who does not complete our anti-money laundering checks.
- l) Details of any automated decision-making, including profiling, that will take place using the personal data.

12.2 The information set out in section 12.1 shall be provided to the data subject at the following times:

- Where the personal data is obtained from the data subject directly, at the time of collection.
- Where the personal data is not obtained from the data subject directly (i.e. from another party):
 - if the personal data is used to communicate with the data subject, at the time of the first communication; or
 - if the personal data is to be disclosed to another party, before it is disclosed; or
 - in any event, no more than one month after JHL Homes obtains the personal data.

13. Data subject access

13.1 A data subject may make a subject access request ("SAR") at any time to find out more about the personal data that JHL Homes holds about them. JHL Homes will respond to SARs within one month of receipt. This can be extended by up to two further months for complex or numerous requests, in which case the data subject will be told of the extension and the reason for it.

13.2 All subject access requests should be sent to the Data Protection Officer: Linda Mulholland, Director and Data Protection Officer — linda@jhlhomes.co.uk.

13.3 JHL Homes does not charge a fee for handling normal SARs. We reserve the right to charge a reasonable fee for additional copies of information already supplied, and for requests that are manifestly unfounded or excessive, particularly where they are repetitive.

Please note: a "subject access request" under data protection law is different from a "Suspicious Activity Report" made to the National Crime Agency under our anti-money laundering obligations. Both are sometimes abbreviated to "SAR". In this policy, SAR means a subject access request.

14. Rectification of personal data

14.1 If a data subject informs JHL Homes that personal data we hold about them is inaccurate or incomplete and asks for it to be rectified, the data will be rectified, and the data subject informed, within one month of receiving their request (extendable by up to two months for complex requests, in which case the data subject will be told of the extension).

14.2 Where any affected personal data has been disclosed to third parties, those parties will be informed of the rectification.

15. Erasure of personal data

15.1 Data subjects may ask JHL Homes to erase the personal data we hold about them in the following circumstances:

- a) It is no longer necessary for JHL Homes to hold that personal data for the purpose for which it was originally collected or processed.

- b) The data subject withdraws their consent to JHL Homes holding and processing their personal data.
- c) The data subject objects to JHL Homes holding and processing their personal data, and there is no overriding legitimate interest allowing JHL Homes to continue doing so (see section 18).
- d) The personal data has been processed unlawfully.
- e) The personal data needs to be erased for JHL Homes to comply with a legal obligation.

15.2 Unless JHL Homes has reasonable grounds to refuse — for example, where we are legally required to keep anti-money laundering records for five years (see section 31) — all requests for erasure will be complied with, and the data subject informed, within one month of receipt (extendable by up to two months for complex requests).

15.3 Where personal data to be erased has been disclosed to third parties, those parties will be informed of the erasure unless this is impossible or would require disproportionate effort.

16. Restriction of personal data processing

16.1 Data subjects may ask JHL Homes to stop processing the personal data we hold about them. If a data subject makes such a request, JHL Homes will retain only the amount of personal data necessary to ensure that no further processing takes place.

16.2 Where any affected personal data has been disclosed to third parties, those parties will be informed of the restriction unless this is impossible or would require disproportionate effort.

17. Data portability

17.1 JHL Homes processes personal data using the following systems:

System	Provider	What we use it for
Zoho CRM	Zoho Corporation	Customer relationship management — storing client, seller, investor and professional contact records, deal notes and correspondence history
Gmail	Google (Google Workspace)	Business email — communicating with clients, sellers, investors and professional associates
Google Calendar	Google (Google Workspace)	Booking and managing calls, viewings and meetings
Ionos HiDrive	IONOS	Secure cloud document storage — each client has their own folder for uploading signed agreements, identity documents and due diligence evidence
Landmark	Landmark Information Group	Electronic identity verification, anti-money laundering, sanctions and politically exposed person (PEP) screening
Revolut Business	Revolut Ltd	Business banking — receiving payment of registration, sourcing and collapse fees
Company website (www.jhlhomes.co.uk)	Wix.com Ltd	Website hosting and the “Contact us” enquiry form — form submissions (name, email, investment interest and message) are stored in our Wix account and emailed to us

17.2 Where a data subject has given consent to JHL Homes processing their personal data in this way, or the processing is necessary for the performance of a contract between JHL Homes and the data subject, the data

subject has the legal right to receive a copy of their personal data and to use it for other purposes (for example, passing it to another data controller).

17.3 To support the right to data portability, JHL Homes will make personal data available in the following formats:

- a) Exported data from Zoho CRM in CSV file format.
- b) Access to the data subject's registration agreements, documents and forms via shared access to their client folder in Ionos HiDrive.
- c) Copies of the data subject's registration agreements, documents or forms as Word or PDF documents, sent by email or via a secure Ionos HiDrive share link (at the data subject's choice).

17.4 Where technically feasible, and if requested by the data subject, personal data will be sent directly to another data controller.

17.5 All requests for copies of personal data will be complied with within one month of the request (extendable by up to two months for complex or numerous requests, in which case the data subject will be told of the extension).

18. Objections to personal data processing

18.1 Data subjects have the right to object to JHL Homes processing their personal data based on legitimate interests (including profiling) and for direct marketing (including profiling).

18.2 Where a data subject objects to processing based on our legitimate interests, JHL Homes will stop that processing immediately unless we can demonstrate that our legitimate grounds override the data subject's interests, rights and freedoms, or the processing is necessary for the conduct of legal claims.

18.3 Where a data subject objects to JHL Homes processing their personal data for direct marketing purposes, we will stop that processing immediately.

19. Automated decision-making

19.1 JHL Homes does not make decisions about data subjects based solely on automated processing. Electronic identity and anti-money laundering checks carried out through Landmark are always reviewed by the Data Protection Officer before any decision is made.

19.2 If JHL Homes were to use personal data for automated decisions with a legal (or similarly significant) effect on data subjects, data subjects would have the right to challenge those decisions, request human intervention, express their own point of view and obtain an explanation of the decision. This right does not apply where the decision is:

- a) Necessary for entering into, or performing, a contract between JHL Homes and the data subject;
- b) Authorised by law; or
- c) Based on the data subject's explicit consent.

20. Profiling

JHL Homes does not use personal data for profiling purposes. If it did, the following would apply:

- a) Clear information explaining the profiling would be provided, including its significance and likely consequences.
- b) Appropriate mathematical or statistical procedures would be used.
- c) Technical and organisational measures would be put in place to minimise the risk of errors and allow them to be easily corrected.
- d) All personal data processed for profiling would be secured to prevent discriminatory effects (see sections 22 to 27).

21. Personal data we collect

The following personal data may be collected, held and processed by JHL Homes:

Contact type	Data collected	Purpose of data
Client – Seller (individual, company, trust or foundation)	Full name, home address, date of birth, email, contact telephone number, proof of identification, proof of address, proof of right to sell or lease the property or site, proof of source of wealth, and answers to questions about the sale of the property or site. All of the above for any shareholders, controllers, trustees, persons of significant control, directors or guarantors.	• Provide our business services • Fulfil our obligations under the Money Laundering Regulations 2017 • Mitigate the risk of money laundering, terrorist financing or proliferation financing • Receive payment for services provided (where applicable)
Client – Buyer / Investor (individual)	Full name, home address, date of birth, email, contact telephone number, proof of identification, proof of address, proof of funds, proof of source of funds, proof of source of wealth, answers to questions about investment strategies and goals, and financial data.	• Provide our business services • Fulfil our obligations under the Money Laundering Regulations 2017 • Mitigate the risk of money laundering, terrorist financing or proliferation financing • Receive payment for services provided
Client – Buyer / Investor (company, trust or foundation)	Full name, home address, date of birth, email, contact telephone number, proof of identification and proof of address for any shareholders, controllers, trustees, persons of significant control, directors or guarantors. Proof of funds, proof of source of funds, proof of source of wealth, answers to questions about investment strategies and goals, and financial data.	• Provide our business services • Fulfil our obligations under the Money Laundering Regulations 2017 • Mitigate the risk of money laundering, terrorist financing or proliferation financing • Receive payment for services provided
Professional associate (e.g. solicitor, broker, agent, contractor)	Company name, contact name, email, contact telephone number, and details of services provided or required.	• Communication • Provide our business services

21.1 Marketing communications

You may receive marketing communications from us (for example, details of new investment opportunities) if you have:

- requested information from us, or purchased services from us; or
- completed one of our “Contact us” forms and ticked the box asking to receive information; and
- not opted out of receiving marketing from us.

You can opt out at any time by replying to any of our marketing emails with “STOP” or “UNSUBSCRIBE”, or by emailing linda@jhlhomes.co.uk with “STOP” in the subject line. Your opt-out will be recorded on your Zoho CRM record so that you are not contacted again.

22. Data protection measures

JHL Homes shall ensure that all its employees, agents, contractors and other parties working on its behalf comply with the following when working with personal data:

- a) Identity documents, proof of funds and other due diligence documents should be uploaded by the data subject directly to their client folder in Ionos HiDrive, rather than sent by email. Personal data is not to be sent by email unless expressly requested by the data owner.
- b) All emails containing personal data must be marked “Confidential” in the subject line.
- c) Where personal data is received by email, the attachment or relevant content must be saved to the data subject’s Ionos HiDrive folder or Zoho CRM record, and the email then deleted from Gmail, including from the Bin folder.
- d) Personal data may be transmitted over secure networks only. Transmission over unsecured networks (for example, public Wi-Fi without a secure connection) is not permitted in any circumstances.
- e) Where personal data is to be transferred in hard copy, it must be marked “Confidential” and passed directly to the recipient or sent by Royal Mail Signed For or Special Delivery.
- f) No personal data may be shared informally. Anyone working on behalf of JHL Homes who needs access to personal data they do not already have must formally request it from the Data Protection Officer.
- g) All hard copies of personal data, and any electronic copies on removable media, must be stored securely in a locked filing cabinet or locked safe.
- h) No personal data may be transferred to any employee, agent, contractor or other party, whether working on behalf of JHL Homes or not, without the authorisation of the Data Protection Officer.
- i) Personal data must be handled with care at all times and must not be left unattended or on view to unauthorised people.
- j) If personal data is being viewed on a computer screen and the computer is to be left unattended for any period, the user must lock the computer before leaving it.

23. Data security — storage

JHL Homes shall ensure that the following measures are taken with respect to the storage of personal data:

- a) All electronic copies of personal data are to be stored in Ionos HiDrive (documents) and Zoho CRM (contact records and notes). Both systems are password-protected and accessed only by authorised users, with two-factor authentication enabled where available.
- b) Personal data should not be stored permanently on the Director’s laptop. Where a file has to be downloaded temporarily (for example, to review a document), it must be moved to Ionos HiDrive or deleted as soon as it is no longer needed.
- c) All hard copies of personal data must be stored in a locked filing cabinet at the company’s office, and any electronic copies on physical, removable media must be stored in a locked safe.
- d) Personal data may be captured on a password-protected mobile device (for example, photographing an original identity document, proof of address, proof of funds or proof of source of funds). Within 24 hours the image must be uploaded to the data subject’s Ionos HiDrive folder and deleted from the device, including from any “recently deleted” folder and from any automatic phone back-up made in that period.
- e) No personal data should be transferred to any device personally belonging to an employee. Personal data may only be transferred to devices belonging to agents, contractors or other parties working on behalf of JHL Homes where that party has agreed to comply fully with this policy and the Regulation.
- f) All passwords used to protect personal data must be changed regularly, must not use words or phrases that can easily be guessed, and must contain a combination of uppercase and lowercase letters, numbers and symbols.

- g) Passwords must never be written down or shared. If a password is forgotten, it must be reset using the applicable method.
- h) Where personal data is used for marketing purposes, the Data Protection Officer is responsible for checking that the data subjects have not registered with any marketing preference service, including the Telephone Preference Service. These checks must be carried out at least annually.

24. Data security — disposal

When any personal data is to be erased or otherwise disposed of for any reason (including where copies have been made and are no longer needed), it must be securely deleted and disposed of:

- **Electronic records** — deleted from Zoho CRM, Ionos HiDrive and Gmail, including from each system's recycle bin or deleted items folder, and from the Director's laptop, including the Recycle Bin and Downloads folder.
- **Hard copies** — cross-cut shredded before recycling.

Retention periods are set out in the Data Retention Schedule in section 31.

25. Data security — use of personal data

JHL Homes shall ensure that the following measures are taken with respect to the use of personal data:

- a) No personal data may be shared informally. Anyone working on behalf of JHL Homes who needs access to personal data they do not already have must formally request it from the Data Protection Officer (Linda Mulholland, Director and Data Protection Officer — linda@jhlhomes.co.uk).
- b) No personal data may be transferred to any employee, agent, contractor or other party, whether working on behalf of JHL Homes or not, without the authorisation of the Data Protection Officer.
- c) Personal data must be handled with care at all times and must not be left unattended or on view to unauthorised people.
- d) If personal data is being viewed on a computer screen and the computer is to be left unattended, the user must lock the computer first.
- e) Where personal data is used for marketing purposes, the Data Protection Officer is responsible for making sure that appropriate consent has been obtained and that the data subject has not opted out, whether directly or via a third-party service such as the Telephone Preference Service.
- f) Personal data is gathered only to provide JHL Homes' services, to receive payment, or to meet our obligations under the Money Laundering Regulations 2017 and HMRC's guidance for estate agency businesses.

26. Data security — IT security

JHL Homes shall ensure that the following measures are taken with respect to IT and information security:

- a) All passwords used to protect personal data must be changed regularly, must not be easily guessed, and must contain a combination of uppercase and lowercase letters, numbers and symbols.
- b) Passwords must never be written down or shared. If a password is forgotten, it must be reset using the applicable method.
- c) All software, including operating systems, browsers and apps used to access Zoho CRM, Google Workspace and Ionos HiDrive, must be kept up to date. The Director is responsible for installing security updates as soon as reasonably practicable, unless there are valid technical reasons not to.
- d) The Director's laptop and mobile phone must be protected by a password, PIN or biometric lock, and must have up-to-date antivirus protection.
- e) No software may be installed on any company-owned computer or device without the prior approval of the Data Protection Officer.

27. Organisational measures

JHL Homes shall ensure that the following measures are taken with respect to the collection, holding and processing of personal data:

- a) Everyone working on behalf of JHL Homes will be made fully aware of their own responsibilities and of JHL Homes' responsibilities under the Regulation and this policy, and will be given a copy of this policy.
- b) Only those who need access to personal data to carry out their duties will be given access to it.
- c) Everyone handling personal data on behalf of JHL Homes will be appropriately trained and supervised. Training is recorded in the JHL Homes Staff Training Matrix.
- d) Methods of collecting, holding and processing personal data will be regularly evaluated and reviewed.
- e) The performance of those handling personal data on behalf of JHL Homes will be regularly evaluated and reviewed.
- f) Everyone handling personal data on behalf of JHL Homes will be bound by contract to do so in line with the Regulation and this policy.
- g) Agents, contractors and other parties working on behalf of JHL Homes must ensure that any of their own staff who process personal data are held to the same conditions.
- h) Where any agent, contractor or other party working on behalf of JHL Homes fails in their obligations under this policy, that party shall indemnify and hold harmless JHL Homes against any costs, liability, damages, loss, claims or proceedings arising from that failure.

28. Transferring personal data outside the UK

28.1 Some of the service providers listed in section 17 may store or process data outside the UK (for example, in the European Economic Area or the United States). Where this happens, JHL Homes will only use providers that protect personal data through a UK adequacy decision, the UK International Data Transfer Agreement or Addendum, or an equivalent safeguard recognised under the Regulation.

28.2 Otherwise, JHL Homes does not transfer personal data to any country outside the UK unless:

- a) The transfer is made with the informed consent of the data subject.
- b) The transfer is necessary for the performance of a contract between the data subject and JHL Homes (or for pre-contractual steps taken at the data subject's request).
- c) The transfer is necessary for important reasons of public interest.
- d) The transfer is necessary for the conduct of legal claims.
- e) The transfer is necessary to protect the vital interests of the data subject or other individuals where the data subject is physically or legally unable to give consent.
- f) The transfer is made from a register that, under UK law, is intended to provide information to the public and is open to public inspection.

29. Data breach notification

29.1 All personal data breaches must be reported immediately to the Data Protection Officer, Linda Mulholland.

29.2 If a breach is likely to result in a risk to the rights and freedoms of data subjects (for example, financial loss, breach of confidentiality, discrimination, reputational damage or other significant social or economic damage), the Data Protection Officer must inform the Information Commissioner's Office without delay, and in any event within 72 hours of becoming aware of it.

29.3 If a breach is likely to result in a high risk to the rights and freedoms of data subjects, the Data Protection Officer must make sure that all affected data subjects are informed directly and without undue delay.

29.4 Data breach notifications must include:

- a) The categories and approximate number of data subjects concerned.
- b) The categories and approximate number of personal data records concerned.

- c) The name and contact details of the Data Protection Officer.
- d) The likely consequences of the breach.
- e) The measures taken, or proposed, to address the breach and, where appropriate, to reduce its possible adverse effects.

29.5 Where a breach involves one of our service providers (for example, Zoho, Google or IONOS), the Data Protection Officer will also contact that provider to establish what happened and what data was affected. All breaches, whether or not they are reported to the ICO, will be recorded internally.

30. Third-party links and cookies

30.1 Third-party links

Our website and emails may include links to third-party websites, applications or plug-ins. Clicking on those links may allow third parties to collect data about you. We do not control those third-party websites and are not responsible for their privacy policies. When you leave our website, we encourage you to read the privacy notice of every website you visit.

30.2 Cookies

Cookies are small text files placed on your device when you visit a website. Our website, www.jhlhomes.co.uk, is built and hosted on the Wix platform. It currently uses only **strictly necessary cookies** set by Wix, which are needed for the website to work securely and reliably. Under the Privacy and Electronic Communications Regulations (PECR), these cookies do not require your consent.

We do **not** currently use analytics, advertising or social media tracking cookies (such as Google Analytics or the Meta Pixel). If we add any non-essential cookies in future, we will update this policy and ask for your consent through a cookie banner before they are set.

The main cookies Wix may set on our website are:

Cookie	Purpose	Duration
XSRF-TOKEN	Security — helps prevent fraudulent form submissions	Session
svSession	Security and core website function — identifies unique visitors	12 months
wixSession / hs	Security and core website function	Session to 12 months
bSession	Measures how well the Wix platform is performing	24 hours
SSR-caching	Indicates how the page was loaded, to speed up rendering	24 hours
TS*	Security — detects and prevents attacks on the website	Session
fedops.logger.sessionId	Tracks technical errors to keep the website stable	12 months
_wixAB3 *	Platform testing of website features	6 months
server-session-bind / client-session-bind	Protects the website's connections to Wix systems	Session

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This cookie information was last reviewed on 3 October 2026.

31. Data retention schedule

JHL Homes keeps personal data only for as long as necessary. The periods below apply unless a longer period is required by law, or the data is needed in connection with a legal claim or complaint.

Type of data	Retention period	Reason
Customer due diligence records (ID, proof of address, proof of funds, source of funds/wealth, Landmark check results) for sellers and investors	5 years from the end of the business relationship or completion of the transaction	Money Laundering Regulations 2017 (regulation 40)
Transaction records, agreements and deal files (Terms of Business, Data Capture Forms, Deal Introduction Forms, sourcing agreements)	6 years from completion of the deal or end of the relationship	Limitation period for contract claims; accounting and tax records
Invoices, payment records and other financial records	6 years from the end of the financial year to which they relate	HMRC and Companies Act requirements
Complaints and complaint correspondence	6 years from the date the complaint is closed	Defence of legal claims; Property Ombudsman requirements
Enquiries that do not lead to registration or a deal	12 months from last contact	Legitimate interests (following up enquiries)
Marketing contacts	Until you opt out, or 2 years after last meaningful contact	Consent / legitimate interests
Professional associate contact details	For as long as we work together, plus 2 years	Legitimate interests

At the end of the retention period, personal data will be securely deleted or destroyed as described in section 24. The Data Protection Officer will review the records held in Zoho CRM and Ionos HiDrive at least every 12 months to identify data that has reached the end of its retention period.

32. Changes to this policy

We may update this policy from time to time, for example when the law changes or we change the systems we use. The latest version will always be published on this page, with the date it was last updated shown at the top.

Contact us

If you have any questions about this policy or how we handle your personal data, please contact our Data Protection Officer, Linda Mulholland:

- Email: linda@jhlhomes.co.uk
- Telephone: 07891 539539

- Post: JHL Homes Ltd, Sycamore House, Maltongate, Langtoft, YO25 3TW

JHL Homes Ltd is registered in England and Wales, company number 17383957. ICO registration ZC223743. Member of The Property Ombudsman (T14950). Supervised by HMRC for anti-money laundering (XL006788170256).