

It is important that you read this policy in full to understand the rules and practices

Shareholder Privacy Notice

Vistry Group PLC

Vistry Group

Updated August 2020

Vistry Group PLC: Shareholder Privacy Notice

Last updated August 2020

Vistry Group PLC is committed to protecting the privacy and security of your personal information

This Shareholder Privacy Notice ("Notice") describes how Vistry Group PLC with its registered address at 11 Tower View, Kings Hill, West Malling, Kent United Kingdom ME19 4UY and company number 00306718 and Vistry Homes Limited with its registered address at 11 Tower View, Kings Hill, West Malling, Kent, United Kingdom ME19 4UY and company number 00397634 (together referred to in this Notice as "Vistry Group", "we", "us" and "our"), each use personal information about you that we collect, use and otherwise process in connection with your relationship with Vistry Group as a shareholder.

Vistry Group will collect and use your personal information as described in this Notice and as permitted by applicable laws, including in circumstances where:

- it is necessary to fulfil our obligations to you as a shareholder
- you have given us your express consent
- it is necessary for one or more legitimate interests pursued by Vistry Group (or another party), so far as these do not unduly intrude on your privacy
- Vistry Group is required to process your personal information in order to comply with a legal obligation

Data protection principles

We will comply with applicable data protection law in the UK and other EU territories where we operate ("Data Protection Law"). The principles of Data Protection Law are that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way
- Collected only for valid purposes that we have explained to you in this Notice or elsewhere and not used in any way that is incompatible with those purposes
- Relevant to the above purposes
- Accurate and kept up to date
- Kept only for as long as necessary for our purposes
- Appropriately protected against security risks

The kind of information we hold about you

We may collect the following information about you:

- Name, title, address, phone number and e-mail address
- Date of birth
- Identification documentation, such as passport information or National Insurance number
- Bank account details
- Shareholder records (including shares held, share purchases, share disposals, dividend entitlements and payments, votes, proxy appointments, shareholder options, exercise conditions and exercise dates)
- Copies of enquiries, complaints and other correspondence and communications with you as a shareholder

How we will use information about you

The personal information we collect will be held and processed by Vistry Group for the following purposes:

- **To manage your shareholding interest in Vistry Group and our relationship with you as a shareholder, including:**
 - to allow you to exercise your rights as a shareholder
 - to include you on our register of shareholders and maintain this and keep it up-to-date
 - to make dividend payments
 - to contact you with shareholder-related information, including shareholder announcements and information about dividend distributions, reports and meetings, including our Annual General Meeting
 - to provide information to Computershare Investor Services Plc ('Computershare'), our registrars, so they can manage your shareholding on our behalf
- **For one or more of the following legitimate interests pursued by Vistry Group:**
 - to produce and maintain shareholder records, announcements and communications
 - to review and respond to any enquiries and complaints you submit to us
 - to conduct data analytics studies to review and better understand and monitor shareholder patterns
 - to manage and administer Vistry Group PLC's business effectively
 - for proper record-keeping purposes relating to Vistry Group's business and shareholdings
 - to comply with legal or regulatory requirements

Sharing your personal information

We may share your personal information with stock exchanges and regulatory authorities to fulfil legal obligations that we are subject to.

We may share your information with other companies in our group, meaning Vistry Group PLC, Vistry Homes Limited and each of its subsidiaries from time to time. A complete list of the group companies is available on request.

We may share your data with third party providers such as Computershare and others in order to communicate with any and all of the shareholders or who provide support services to our business. These providers process your personal information in accordance with our instructions and subject to data processing agreements in accordance with applicable Data Protection Law.

Transferring your information outside the UK or European Economic Area ("EEA")

We may transfer personal information that we collect to selected service providers, performing functions on our behalf, based in countries outside of the UK or EEA.

Personal information stored in another jurisdiction may be subject to access requests from governments, courts, or law enforcement in that jurisdiction according to local laws. Whether the personal information you provide to Vistry Group is processed by us or our service providers within the UK or EEA or outside of it, we will use legally recognised data transfer mechanisms under applicable UK or EEA data protection law to secure and safeguard this personal information.

Data retention

We will only keep your personal information as long as you remain a shareholder and for up to 10 years after you cease to be a shareholder. This will be for the purpose of identifying, issuing or resolving legal claims and so we can comply with applicable legislative and regulatory requirements for the keeping of records.

Once personal information is no longer required to be retained by us, it will be deleted or destroyed in an appropriate manner in accordance with applicable data protection law.

Rights of access, correction, erasure, and restriction

Your duty to inform us of changes

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

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you other information about how we process it.
- Request correction of any incomplete or inaccurate personal information that we hold about you.
- Request erasure of your personal information where there is no good reason for us continuing to process it.
- Object to processing of your personal information where we are relying on a legitimate interest. You also have the right to object to us processing your personal information to send you direct marketing.
- Request the restriction of processing. For example if there is a dispute about its accuracy or the reason for us processing it.
- Request the transfer of your personal information to another party in certain circumstances.
- Your right to withdraw consent. In circumstances where you have provided your consent to us processing your personal information for a specific purpose, you have the right to withdraw your consent for that specific purpose at any time.

To exercise these rights, please contact our Data Protection Team at the address below.

Contacting our data protection team

Our Data Protection Team oversees compliance with this Notice and Data Protection Law. If you have any questions about this Notice or how we handle your personal information, please contact the Data Protection Team at Vistry Group PLC, Cleeve Hall, Cheltenham Road, Bishops Cleeve, Cheltenham, Gloucestershire GL52 8DG or by email at data.protection@vistrygroup.co.uk

If you feel that we are not processing your personal information in accordance with Data Protection Law, you also have the right to make a complaint at any time to the Information Commissioner’s Office (ICO).

See www.ico.org.uk/make-a-complaint

Changes to this privacy notice

We reserve the right to update this Notice at any time by updating the version on our website. In certain circumstances when we make any substantial updates to this Notice, we may also notify you directly of these changes in writing.