

Privacy policy

Last updated: 12 May 2026

Effective from: 12 May 2026

1. Introduction

1.1 Hawkeye Land Limited ("Ortelias", "we", "us", "our"), the operator of the Ortelias platform (ortelias.com and the subscriber website, together the "Platform"), is committed to protecting the personal data we process. This Privacy Policy explains what personal data we collect, why we collect it, how we use it, who we share it with, and the rights you have in respect of it.

1.2 We are the data controller for the personal data described in this Privacy Policy. We are responsible for compliance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

1.3 Our ICO registration number will be added to this Privacy Policy once registration is complete.

2. Whose data we process

2.1 This Privacy Policy describes how we process personal data relating to four groups:

- commercial subscribers and prospective commercial subscribers (individuals subscribing in the course of a business, profession, trade, or organisation, or enquiring about the Platform on that basis);
- consumer subscribers and prospective consumer subscribers (individuals subscribing as consumers, or enquiring about the Platform on that basis);
- estate agents whose listings appear on the Platform (where business contact information is processed);
- visitors to ortelias.com.

2.2 Where this Policy distinguishes between commercial subscribers and consumer subscribers, those terms have the same meaning as in our Subscriber Terms and Conditions.

3. Personal data we collect

3.1 Subscribers and prospective subscribers (commercial and consumer)

We collect:

- account details (name, email address, role where applicable, organisation name where applicable, billing address);
- payment information processed by Stripe; Stripe holds the card details and provides us only with confirmation of payment, transaction reference, and basic billing metadata;
- Platform usage data (search queries, listings viewed, features used, IP address, browser and device information, dates and times of access);
- communications with us (messages sent to support, sales, or partnership email addresses).

3.2 Estate agents whose listings appear on the Platform

We collect business contact information published by estate agents on their public websites, including:

- agency name, branch, and trading address;
- agent contact information (name, email address, telephone number) where published as a point of contact for a listing;
- listing content published by the agent (descriptions, images, brochures, prices, dates, status).

We do not collect personal data of agents that has not been published by them on a public website for the purpose of being contacted in connection with their listings.

3.3 Website visitors

We collect IP address, browser and device information, pages viewed, referring URLs, and other usage information through cookies and similar technologies. See our Cookie Policy at ortelias.com/cookies for details.

4. How we use personal data and the lawful basis for processing

4.1 Commercial subscribers

We use commercial subscriber personal data to provide and maintain the Platform, manage subscriptions, process payments, communicate about the service, provide customer support, improve the Platform, and meet our legal and regulatory obligations.

We may also use subscriber activity data (search behaviour, listing engagement, brief composition, feature usage), in anonymised and aggregated form, for any lawful business purpose. This includes: improving and developing the Platform; producing market intelligence and insights; publishing market commentary and analysis; engaging with government, regulators, and policy stakeholders; providing aggregated analytics to listing agents about engagement with their listings; and developing, marketing, and selling data products, market reports, and intelligence packages. Anonymised and aggregated data is processed in a form that does not identify individual subscribers either directly or by combination with other information reasonably available to a recipient.

Our lawful bases are: contract (where processing is necessary to provide the Platform under our Subscriber Terms and Conditions); legitimate interests (for service improvement, fraud prevention, security, and the development and commercialisation of anonymised market intelligence); legal obligation (where processing is required by law, including financial record retention); and consent (where you have opted in to optional communications).

4.2 Consumer subscribers

We use consumer subscriber personal data to provide and maintain the Platform, manage subscriptions, process payments, communicate about the service (including renewal reminders and cooling-off notices in accordance with consumer law), provide customer support, improve the Platform, and meet our legal and regulatory obligations.

We may also use subscriber activity data, in anonymised and aggregated form, for the same business purposes set out in clause 4.1, on the same anonymisation and aggregation safeguards.

Our lawful bases are the same as for commercial subscribers, with the addition of statutory obligations specific to consumer protection law (including the Consumer Rights Act 2015 and, when in force, the subscription contracts regime under Part 4 Chapter 2 of the Digital Markets, Competition and Consumers Act 2024).

4.3 Estate agents

We process estate agent business contact information to aggregate and present listing information on the Platform, attribute listings to the originating agent, route subscriber enquiries back to the agent, and produce aggregated analytics about listing engagement.

Our lawful basis is legitimate interests. Our legitimate interests are to operate a development land discovery service, to deliver value to estate agents through traffic and qualified subscriber attention, and to maintain a comprehensive and accurate market record. We have completed a Legitimate Interests Assessment

which records our analysis and is available on request to the Information Commissioner's Office or to data subjects who request it.

We process only business contact information that has been published by the agent on a public website for the purpose of being contacted in connection with the listings to which it relates. Estate agents may request that their listings and associated contact information be removed from the Platform at any time. See clause 7.

4.4 Website visitors

We use visitor data to operate ortelias.com, understand how the website is used, improve content and functionality, and protect against fraud and abuse. Our lawful bases are legitimate interests and, where required, consent (for example, for non-essential cookies).

4.5 Marketing communications

We rely on consent as the lawful basis for sending you marketing communications. This consent is collected at sign-up through the Stripe checkout, by a separate opt-in tick-box that is distinct from your acceptance of these Terms and from any service-related contact about your own account or Subscription.

The consent we ask for covers four channels: email, SMS, WhatsApp, and phone (including occasional upsell or product-suitability calls). The consent text is presented in plain language at the point of sign-up so you can see the full set of channels you are agreeing to before you tick.

At the launch of the Platform, only email marketing is operationally active. We do not currently send marketing messages by SMS, WhatsApp, or phone, although your consent permits us to do so when those channels are introduced. We will not commence marketing on a new channel without first ensuring that an in-channel opt-out mechanism (such as "reply STOP" for SMS and WhatsApp, or a clearly signposted do-not-call route for phone) is in place.

You may withdraw consent at any time, without affecting the lawfulness of processing carried out before withdrawal. To withdraw consent, email hello@ortelias.com, click the unsubscribe link in any marketing email, or reply STOP to any marketing SMS or WhatsApp message once those channels are active. Withdrawing marketing consent does not affect service-related communications about your own Subscription, which we may continue to send on the basis of contract or legitimate interests as set out elsewhere in this Policy.

5. Sharing personal data

We share personal data with:

- Stripe, our payment processor, which processes payment information on our behalf;
- HubSpot, our customer relationship management (CRM) and customer-record processor, which stores contact records, manages our communications with subscribers, and mirrors consent and subscription records sourced from Stripe; HubSpot is based in the United States and we rely on the transfer mechanisms in clause 10, supported by HubSpot's published transfer impact assessment, for the relevant international transfer;
- our hosting, infrastructure, email, and analytics providers, which process data on our behalf under written processor agreements;
- third-party artificial intelligence service providers, which process subscriber inputs to the Ortelias AI and return outputs to the Platform; these providers handle inputs in accordance with our processor agreements with them and are not permitted to use subscriber inputs to train their general-purpose AI models, except where the input has been anonymised and aggregated and cannot be linked back to the subscriber;
- listing agents, in the form of aggregated analytics about engagement with their listings; we do not share information that identifies individual subscribers, and aggregated analytics are produced at thresholds designed to prevent re-identification;
- government, regulators, industry bodies, and policy stakeholders, in the form of anonymised and aggregated market intelligence and analysis; recipients receive only data that does not identify individual subscribers;
- purchasers of our market reports, data products, or intelligence packages, in the form of anonymised and aggregated content; recipients receive only data that does not identify individual subscribers;
- professional advisors (legal, accounting, audit) under appropriate confidentiality obligations;
- government, regulatory, and law enforcement authorities where we are required to do so by law, or where disclosure is necessary to protect our legal rights.

We do not sell personal data to third parties.

6. Data retention

6.1 Subscriber data

We retain subscriber account and usage data for the duration of the subscription. Following the end of a subscription, we retain account data for up to twenty-four months for legitimate business purposes (including resolving disputes, evidencing service delivery, recovering unpaid fees, and re-

engagement). Subscribers may request earlier deletion in accordance with clause 8, subject to our legal obligations.

6.2 Listing data

Listing data, including agent business contact information attached to listings, may be retained on a permanent basis as part of the Ortelias historical archive. The archive serves a legitimate professional purpose: providing comparable evidence for valuations, pricing analysis, planning research, and market history. Removal-on-request applies to the live presentation of listings as described in clause 7. Where an agent has requested removal, the agent's contact information is removed from the live Platform; archive copies of listings, where retained, are kept in accordance with our Legitimate Interests Assessment and are not used in a manner that creates ongoing detriment to the agent.

6.3 Financial records

Financial and tax records are retained for seven years in accordance with UK tax and accounting requirements.

7. Removal requests by estate agents

7.1 Estate agents whose listings or business contact information appear on the Platform may at any time request that their listings be removed from the live Platform. Removal requests should be sent to partners@ortelias.com.

7.2 On receipt, we will:

- acknowledge the request within one hour by automated reply;
- contact the agent within twenty-four hours through our partnerships team;
- action the removal so that the listings are no longer presented on the live Platform within forty-eight hours of the original request;
- confirm completion to the agent by email.

7.3 We may, before actioning removal, contact the agent to explain how Ortelias operates and to discuss the option of a free agent partnership account, under which the agent's listings continue to appear with their consent under separate terms. The agent's decision to be removed is respected without condition.

8. Your rights

Under the UK GDPR, you have the right to:

- access the personal data we hold about you;
- have inaccurate personal data corrected;
- request deletion of your personal data, where the legal grounds permit;

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- restrict our processing of your personal data, in certain circumstances;
 - receive your personal data in a structured, machine-readable format, where applicable;
 - object to processing based on legitimate interests;
 - withdraw consent, where consent is the lawful basis for processing.

To exercise any of these rights, contact us at hello@ortelias.com. We will respond within thirty days of a valid request, or sooner where required by law.

9. Data security

9.1 We use appropriate technical and organisational measures to protect personal data against unauthorised access, alteration, disclosure, or destruction. These include encryption of data in transit and at rest, access controls, secure infrastructure, and regular review of our security posture.

10. International transfers

10.1 Some of our service providers process personal data outside the United Kingdom. Where this occurs, we put in place appropriate safeguards, including the International Data Transfer Agreement, the UK Addendum to the EU Standard Contractual Clauses, or other mechanisms recognised by the Information Commissioner's Office.

11. Changes to this Privacy Policy

11.1 We may update this Privacy Policy from time to time. The updated policy takes effect on the date stated at the top of the document. We will notify subscribers of material changes by email or through the Platform.

12. Contact and complaints

12.1 For questions about this Privacy Policy or to exercise your rights, contact us at hello@ortelias.com.

12.2 You also have the right to lodge a complaint with the Information Commissioner's Office at ico.org.uk.

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