Privacy Policy

As the controller of your data, Conveyancing Alliance Limited ("CAL") will comply with Data Protection laws in the United Kingdom and the EU General Data Protection Regulation (GDPR). This Privacy Policy details how CAL processes your personal data.

We keep our Privacy Notice under regular review and we will place any updates on this web page. This Privacy Notice was last updated on 1 May 2018.

This website may contain links to other websites. This Privacy Policy applies to this website only and we are not responsible for the privacy practices of other websites (other than other websites we operate). We recommend that you read the privacy policies of those other websites if you visit them.

The personal data we collect about you

Personal data collected, used, stored and transferred by us may include:

- Identity Data including forenames, last name, and username or similar identifier
- Contact Data including home address, email address and telephone numbers
- Financial Data including bank details,
- Transaction Data including payments made to you
- Technical Data including internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices used to access the CAL websites
- Profile and Usage Data including any quotes generated by you, feedback and survey responses, and how you use our website and services
- Marketing and Communications Data including your preferences in receiving marketing from us and our business partners and your communication preferences.

How do we collect your personal data?

Personal data is collected by us using the following methods:

- Direct interactions with one of our staff by post, phone, email or otherwise when sourcing and applying for conveyancing products, processing Identity, Contact and Financial categories of personal data.
- Automated technologies or interactions with our website, by using any web enquiry form or quotation engine, processing Identity, Contact, Financial and Technical categories of personal data

- Third parties or publicly available sources (processing Identity, Contact and Financial categories of personal data) such as:
 - Estate agents with whom you may be interacting, but only with your consent;
 - Mortgage advisers or providers, with whom you may be interacting, but only with your consent;

How do we use your personal data?

We use your personal data in the following circumstances and relying on the following lawful basis for processing:

Purpose/Activity	Type(s) of data may include	Lawful bases for processing
	Identity Contact	
interact with us or our systems		Consent
	Financial Ne	Performance of a contract with you. Necessary for our legitimate interest
		(to ensure you are paid)
		Performance of a contract with you
chosen member of one of our panel of service providers	Financial	Necessary for our legitimate interest
		(to ensure payments are received or paid)
To manage our relationship with you	Identity Contact	Performance of a contract with you
which will include;Notifying you about changes to our terms of use or privacy policy	Profile & Usage	To comply with legal obligation
	-	Necessary for our legitimate interest (to re-engage
Reviews & Surveys		with you and to maintain and
 Re-engagement when existing products near expiry 		improve customer standards)
To administer and protect our	Identity Contact	To comply with legal obligation
· · · · · · · · · · · · · · · · · · ·	Technical	Necessary for our legitimate interest
troubleshooting, data analysis, testing, system maintenance, support,		(for running our business, provision
reporting and hosting of data)		of administration and IT services, network security,
		to prevent fraud and in the context
		of a business reorganisation or group restructuring exercise)

To deliver relevant website content	Identity Contact	Necessary for our legitimate interests
advertisements to you and measure or	Profile & Usage Marketing & Comms Technical	(to study how customers use our products/ services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our	Technical Profile &	Necessary for our legitimate interests
website, products/services, marketing,	Usage	(to analyse customer usage, update
customer relationships and		our website, to develop our business
experiences		and to inform our marketing
		strategy)
		Sharegy

Change of purpose

We will only use personal data for the purposes stated above, unless we reasonably consider that we need to use it for another reason and it is compatible with the original purpose. Please contact us for an explanation as to how any new processing compatible with the original purpose.

If we need to use your personal data for an unrelated purpose, we will notify you and explain the legal basis which allows us to do so. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Marketing communications

If you are registered as a permitted business user of our website you may receive the latest details about our products and services.

You can opt-out of receiving these types of communications at any time by clicking on the relevant link in email communications you receive from us or by contacting us at admin@conveyalliance.co.uk

Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We also limit access to your personal data to only those CAL employees, appointed representatives, advisers, business partners and suppliers who have a business need to know. They are also subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Cookies

When using the CAL websites, you can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our websites may become inaccessible or not function properly. For more information about the cookies we use, please see our <u>cookie policy</u>.

Sharing of personal data outside of the European Economic Area

Some of our external suppliers may process personal data outside the European Economic Area (EEA). If we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

We may also use specific contracts approved by the European Commission that provide the same level of protection for personal data as it has in the EEA.

Who we disclose personal data to

Your personal data may be shared with third parties for the following purposes:

Type of recipient	Reason
Within CAL and it's group companies	It may be necessary to share your personal data with CAL specialist service providers in order to source relevant products and services or to reengage existing clients
External Suppliers	Specialist IT system providers to facilitate the sourcing of products, to provide advice, to inform you of relevant products and services, and to request feedback on customer service standards. It may also be necessary to share your personal information with non-affiliated companies who perform support services on our behalf including those that provide professional, legal or accounting advice to CAL.
Service Providers	We share your information with any service providers who are selected to act on your behalf.
Regulators	Sharing of information may be necessary to verify your identity and comply with Anti Money Laundering legislation. We may disclose your personal information if we are asked to do so by the police or any other regulatory or Government authority.
Others	3rd parties to whom we choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new

owners may use your personal data in the same way as set out in this privacy notice.

These companies are required to ensure appropriate security measures are in place and maintain the confidentiality of your personal data, and to use your personal data only in the course of providing such services and in accordance with CAL instructions.

How long is your personal data retained?

We only retain your personal data for as long as necessary. The table below outlines how long data is retained, and depends on the reason the personal data is used for:

Purpose of Processing	Retention
Where a product or service is ordered and completed	6 years from date of completion
Successful panel or user application	6 years from date of last transaction
Where a quote does not proceed to instruction	1 year from date of quotation
Where a product or service is cancelled	6 years from date of cancellation

Your legal rights regarding your personal data

After these retention periods if there is no other on-going client relationship your personal data will either be securely deleted or anonymised so that it can be used for statistical purposes but without any method of identifying you individually.

You have the right to:

- Request access to your personal data.
 This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data.
 This enables you to have any incomplete or inaccurate data corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data.
 This enables you to ask us to delete personal data where there is no good reason for us continuing to process it. You can also to ask us to delete your personal data where you have successfully objected to the processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with

local law. Note, however, that we may not always be able to delete the data for specific legal reasons which will be notified to you, if applicable, at the time of your request.

• Object to processing of your personal data

Where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object

to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

• Request restriction of processing of your personal data.

This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- a. if you want us to establish the data's accuracy;
- b. where our use of the data is unlawful but you do not want us to erase it;
- c. where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
- d. you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Request the transfer of your personal data to you or to a third party.
 We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your personal data.

However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Questions

If you have any questions or complaints relating to how we use your personal data, or if you wish to exercise any of your rights regarding your personal data, please contact us by writing to the Managing Director at Conveyancing Alliance Continental House Oakridge West End Surrey GU24 9PJ. We will respond to you as soon as is possible. The length of time will depend on the type and complexity of the request, but you will receive a response no later than one month from the initial request.

What if I am still not satisfied?

If you are not satisfied with how we respond to your enquiry, you have the right to complain to the Information Commissioner's Office (ICO), who is the regulator for data protection in the United Kingdom. Their website is www.ico.org.uk.