

## **Conveyancing Direct Property Lawyers Limited**

### **1. Who we are**

This Privacy Notice applies to the use and processing of personal information collected by **Conveyancing Direct Property Lawyers Limited**, which forms part of the Connells Group Limited. The ICO Registration number for Conveyancing Direct Property Lawyers Limited is Z6624468. Our registered address is Windmill Road, St Leonards on Sea, East Sussex, TN38 9BY.

The phrases “us”, “we” or “our” will mean those businesses which are part of Conveyancing Direct Property Lawyers Limited on behalf of and in respect of whom this Privacy Notice is made.

For information concerning the collection, use and processing of personal information by any of our third party business partners or suppliers, please contact our representative with whom you usually deal.

### **2. Information covered by this Privacy Notice**

- (i) **Personal data.** This is information, or any combination of separate pieces of information, that could be used to identify you
- (ii) **Special categories of personal data.** This is information which is classified as sensitive (for example details of your health)

Please read this Privacy Notice carefully. If you have any questions about this notice or our use of your personal data, please contact the Connells Group Data Protection Officer by email to [DPO@connellsgroup.co.uk](mailto:DPO@connellsgroup.co.uk) or in writing to Cumbria House, 16-20 Hockliffe Street, Leighton Buzzard, Bedfordshire, LU7 1GN.

Conveyancing Direct Property Lawyers Limited is part of the Connells Group, and all data protection matters are managed at Group level. Information concerning the make-up of the Connells Group can be found by visiting <http://www.connellsgroup.co.uk/our-group>

### **3. Where we get personal information from**

When you enquire or register for products and services provided by Conveyancing Direct Property Lawyers Limited we may collect personal information from a variety of sources.

The majority of the personal information which we collect will have been provided by you during the course of your relationship with us either through face to face contact, by telephone, email or electronic communications such as online portals, messaging or through the internet.

However we may also obtain your personal data from other sources including:

- information we collect when you visit or create an account via our online portal
- other Connells Group companies
- companies which support advertising services that promote our services including online property portals (such as Perfect Portal or price comparison sites), social media sites (such as Facebook) and online advertising platforms (such as Google Adwords)
- information provided to us by other third parties
- other publically available sources such as the electoral roll and HM Land Registry

### **4. What information we collect**

#### **4.1 Information we collect directly from you**

Depending on the type of service or product we are discussing, the following are examples of information we may collect directly from you:

Information we may collect directly from you	Why we collect it
Your name, postal address, phone number, email address and details of your requirements	To deliver conveyancing services in accordance with your requirements and our Code of Conduct to buy or sell a property or to act for you and/or the lender in the re-mortgage of a property
Your date of birth, nationality and details from identity documents you provide	To perform verification of identity, 'Know Your Client' and Anti-Money Laundering checks (including electronic Identity Verification checks) and to protect against and prevent fraud, unauthorised transactions, money laundering, tax evasion, claims and other liabilities as required by law
Proof that you have sufficient funds of legitimate origin to support any proposed contribution of funds towards you buying or re-mortgaging a property	To perform verification of identity, 'Know Your Client' and Anti-Money Laundering checks and to protect against and prevent fraud, unauthorised transactions, money laundering, tax evasion, claims and other liabilities as required by law
Financial information, for example, a copy of your bank statements, wage slips, evidence of income or a copy of your mortgage offer from your mortgage provider	To retain evidence of the source of funds you will be using to pay into our Client Account to purchase a property or facilitate other financial disbursements, as applicable, to ensure the funds are of legitimate origin and to protect against and prevent fraud, unauthorised transactions, money laundering, tax evasion, claims and other liabilities as required by law
Your bank account details	Where we take payment for the services we provide to you and where we make any sale proceeds, re-mortgage surplus or other payment to you
Evidence that you have the right to buy, sell or let a property	Where you are a landlord and instruct us to act in relation to a Buy to Let or Let to Buy property
Details of any mortgage or insurance, licensing documentation and service contracts which you have in place in relation to a property you wish to buy, sell, re-mortgage or let	Where you are a landlord and instruct us to act in relation to a Buy to Let or Let to Buy property
Details relating to your property including confirmation of floor plans, energy performance certificate ratings/ home reports, Building Regulation certificates, property descriptions and information and survey results	To deliver our conveyancing services to you and to share with interested third parties such as the legal professionals representing the buyers of a property
Your name, gender, previous name, mother's maiden name, date of birth, contact telephone numbers, current address and previous addresses, information about your status and dependents, your nationality, bank account details, savings and investments, existing financial commitments, your credit history, your mortgage requirements and existing	To perform verification of identity, 'Know Your Client' and Anti-Money Laundering checks and to protect against and prevent fraud, unauthorised transactions, money laundering, tax evasion, claims and other liabilities as required by law

protection arrangements, any details regarding Power of Attorney	
Information disclosed to us indicating the possibility of a vulnerable customer	To remain committed to the fair treatment of all our customers, including those who are vulnerable, and will take all reasonable measures to ensure that the risks of harm to welfare are minimised and that customers are treated fairly.
Your communication and marketing preferences	To ensure we only send you details of products and services you are interested in through your preferred communication channel

Where we collect personal information from you which is of a sensitive nature, we treat this 'special category' information in accordance with the additional protection it is given under data protection laws.

We may, during the course of your relationship with us, request additional information from you which is relevant to the provision of specific services.

Any telephone calls either to or from our customer service teams may be recorded for training, monitoring, compliance and security.

#### **4.2 Information we collect when you visit or create an account on our websites**

We use cookies and other technologies to collect information when you visit our web site or online customer portal

We may collect personal information in connection with your use of our website, such as:

- your name, email address, telephone number and property address when you register for an account or use an online form to request a quote for our services
- data sent from your browser to our server which may include:
  - the time, date and duration of your visit
  - the site from which you have come (the referral URL)
  - the pages you have visited and
  - your IP address

Details of how we use cookies are provided in Section 13 'Our Use of Cookies' or via our Cookie Policy at <https://conveyancingdirect.net/wp-content/uploads/2021/04/CDPL-Cookie-Policy-Draft-Final.pdf>

#### **4.3 Information we obtain from other Connells Group companies**

For activities related to providing advice on regulated mortgages and non-investment insurance contracts, Conveyancing Direct Property Lawyers Limited are an appointed representative of Connells Limited, and may share your information within the Group.

Connells Ltd is authorised and regulated by the Financial Conduct Authority; the Financial Services Register number is 302221.

#### **4.4 Information we obtain from online portals**

Where you contact by providing your details through online portals we will use this data to provide you with a quote for our services and to deliver conveyancing services in accordance with our Code of Conduct and Terms and Conditions.

#### **4.5 Information we obtain from third parties**

Where we are required by law, or for business needs, we will obtain information about you from third parties. For example (but not limited to) Electronic Identity Verification solution providers, banks, employers, accountants, mortgage providers, solicitors in order to obtain information necessary for our performance of a contract, undertake identity verification and to deliver conveyancing services in accordance with our Code of Conduct and Terms and Conditions. This will include information received from Skipton Building Society upon a referral being made to ourselves.

#### **4.6 Circumstances under which Bankruptcy Checks will be undertaken**

The arrangement of certain types of conveyancing transaction may involve disclosure by you to us of information relating to historic or current bankruptcy. This is relevant to insurance related activities such as underwriting, claims and fraud management.

When we process any Bankruptcy Checks we do so on the basis that it is in the substantial public interest to be able to provide vital insurance products as permitted by UK data protection related laws and regulations from time to time. Information on Bankruptcy Checks must be capable of being exchanged freely between insurance intermediaries such as us and insurance providers, to enable customers to secure the important insurance protection that they require.

### **5. How we use your information**

We will process the information you provide or we obtain from other sources to provide you with products and services and answer any questions you may have.

The following are examples of how we use the information we collect:

- To process your registration and confirm your identity
- To provide you with the conveyancing services which you have asked us to provide, including but not limited to:
  - effecting transfer of Title with HM Land Registry to sell your property
  - effecting transfer of Title with HM Land Registry to buy your property
  - re-mortgaging a property
  - arranging for Transfer of Equity on the Title of a property
- To provide conveyancing services
- To provide will writing and associated legal services
- To provide property auction services
- To create and manage your on line account
- To process payment for our services
- To protect against and prevent fraud, unauthorised transactions, money laundering, tax evasion, claims, other liabilities and manage risk exposure and agent or franchise quality, integrity, compliance and security of business processes
- To provide, administer and communicate with you about Connells Group products, services, offers, programs and promotions, their issuers, acquirers, retailers and partners
- To protect your best interests in accordance with our Code of Conduct
- To protect your Lender's best interests in accordance with our Code of Conduct (if applicable)
- To produce information to a buyer's legal representation to satisfy their enquiries if you are selling a property
- To compile business directories, including business contact information and maintain up to date client records
- To operate, monitor, evaluate and improve our products, services and websites
- To evaluate your interest in and suitability for employment

#### **5.1 Customer Surveys**

From time to time we may provide your information to our customer service agencies for research, survey and analysis purposes so that we can monitor and improve the services we provide. We or our agents and sub-contractors may occasionally contact you including by post, email or telephone to ask you for your feedback and comments on our services.

## 5.2 Information about our products and services

We may also use your personal data to contact you by post, e mail, telephone or other electronic means to provide you with information about products and services from the Connells Group and carefully selected third parties which we feel may be of interest or relevant to your needs.

Please see Section 12 for information about how you can exercise your rights.

## 5.3 Credit scoring

Some of the services provided by third parties may involve an automated decision and/or credit scoring to determine whether we are able to provide a service or product.

Using third parties to undertake searches and collate information on our behalf helps make fair and responsible decisions. When coming to these decisions we and third parties will consider:

- the information provided on the application form
- information about previous account conduct , including any payment arrears and
- official public records information such as fraud record information and insolvency records

Any credit scoring methods used by third parties are regularly tested to ensure they remain fair, effective and unbiased.

For further information about automated decisions or credit scoring, please contact the Connells Group Data Protection Officer by e mail at [DPO@connellsgroup.co.uk](mailto:DPO@connellsgroup.co.uk)

## 6. Who we share your information with

We may share your information both within the Connells Group of companies and also relevant third party business partners, both for the purposes set out in this Privacy Notice, or for other purposes approved by you.

### 6.1 Connells Group

We may share information within the Connells Group of companies for the following purposes:

- where services are provided by one Connells Group Company to another pursuant to an intra-company
- for the purpose of administering our business
- to provide you with information about products and services
- for any other purpose agreed by you

### 6.2 Third Party service providers

Where we engage third party service providers to deliver services in accordance with the performance of a contract or other business services and operations, we provide them with only the personal information they need to perform the service or provide the product we request. We contractually require them to securely protect information, and not to use it for any other purpose.

Indicatively - but not limited to - we may disclose your information to the third parties listed below for the purposes listed:

Third party	Why we share your personal information
Various Connells Group Estate Agents and Mortgage Services	To receive referrals for conveyancing services (sales, purchases, remortgages, effecting the transfer of Title to a property)
Independent third party Estate Agents and Mortgage Service Providers	To receive referrals for conveyancing services (sales, purchases, remortgages, effecting the transfer of Title to a property)

Law firms on the Connells Group conveyancing panel	To provide home conveyancing services
Mortgage Service Providers	To receive and disburse funds and details of mortgage offers and mortgage deeds
Barclays.Net	To process credit and debit payments to facilitate transactions
First Title/Aviva	To progress your enquiry or application for indemnity insurance policies
TM Group Limited and other Search Providers	To order searches from Local Councils and relevant public record sources to carry out land searches on property (including but not limited to; Water and Drainage Searches, Environmental Searches, Local Authority Searches, Mining Searches, etc.)
Solicitors/Conveyancers/External Law Firms	To share information and documentation necessary to facilitate the delivery of conveyancing services in accordance with the Council for Licensed Conveyancer's Code of Conduct
Referencing Companies/ TransUnion – Call Validate/CREDAS/ various Electronic Identity Verification service providers	To verify identity in accordance with the Council for Licensed Conveyancers Code of Conduct and The Anti Money Laundering, Counter-Terrorist Financing (Information on the Payer) Regulations 2017 and to protect against and prevent fraud, unauthorised transactions, money laundering, tax evasion, claims and other liabilities as required by law
The Local Council/Local Authority	Obtain search information and details of Right to Buy and Help to Buy schemes, obtain property information and other relevant information such as details of planning permission
Law enforcement bodies including the police, the courts and local authorities	To comply with court orders or legal obligations
Landlords and Managing Agents	To comply with Landlord and Managing Agent Requirements for Leasehold properties and matters as applicable
NHBC	To comply with NHBC requirements
HM Land Registry	To deliver conveyancing services in accordance with the Council for Licensed Conveyancer's Code of Conduct, check Title status of properties, effect the transfer of Title to the Register, to protect against and prevent fraud, unauthorised transactions, money laundering, tax evasion, claims and other liabilities
Lender Exchange	To verify the details of external law firms and lenders and to protect against and prevent fraud, unauthorised transactions, money

	laundering, tax evasion, claims and other liabilities
Debt collection companies	To assist us in recovering any monies which are owed and overdue
Our Regulatory body, the Council for Licensed Conveyancers	To deliver conveyancing services in accordance with the Council for Licensed Conveyancer's Code of Conduct
Legal Ombudsman Service	Where they are providing a dispute resolution service in connection with the provision of conveyancing services

We also provided a link from our website to Google Maps, to show the location of a branch or a property, and to allow you to input your postcode to get directions. If you use or access Google Maps you are bound by the Google Maps/Google Earth Additional Terms of Service [https://maps.google.com/help/terms\\_maps.html](https://maps.google.com/help/terms_maps.html) including the Google Privacy Policy <https://www.google.com/intl/ALL/policies/privacy/index.html>

## 7. Lawful basis of processing

Conveyancing Direct Property Lawyers Limited processes your information under any of the following lawful conditions:

- (i) **Performance of a contract** - this is where the collection and processing of your data is necessary for the performance of a contract to which you are a party, or in order to take steps at your request prior to entering into a contract
- (ii) **Legal obligation** - this is where the collection and processing of your data is necessary for compliance with a legal obligation, for example verification of identity and fraud prevention
- (iii) **Consent** - where we process information under consent we will seek your clear and unambiguous consent before processing your data, for example to send and/or receive marketing information from other Connells Group companies
- (iv) **Legitimate interests** - some information is processed by Conveyancing Direct Property Lawyers Limited as part of its legitimate interests which include network and information security, direct marketing, web analytics, updating customer details, lettings, sales, and other core services provided

## 8. Other situations

We may transfer or otherwise process your personal information:

- As part of the sale of a Connells Group business to another company, or in relation to the purchase of another business
- When we have received your instruction to pass search data we hold or other legal papers that are your property to alternative legal representation if we cease to act or you withdraw your instruction
- To enforce our Terms and Conditions
- When required by law and/or government authorities
- When requested by the Legal Ombudsman Service or any other consumer ombudsman or trade association

## 9. How long we keep your information for

We will keep your information for as long as is reasonably necessary for the purposes set out in this privacy notice, and to fulfil our legal and regulatory obligations.

For further information about how long we will keep your information, please contact the Connells Group Data Protection Officer by email at [DPO@connellsgroup.co.uk](mailto:DPO@connellsgroup.co.uk)

## **10. When we communicate with you**

### **10.1 Service related**

We will send you service related communications and respond to any questions which you may ask.

### **10.2 Marketing our services to you**

We will contact you in order to provide you with information about our products and services which we believe may be of interest to you, and which relate to your needs.

Where you have given us your permission, we will contact you to provide information about products or services which are not similar to those that we currently provide, but which we believe may be of interest to you.

## **11. How we communicate with you**

For service related communications, we will contact you either by e mail, through the post or via telephone.

We give you choices about how we communicate promotions and offers to you.

### **11.1 By e mail**

We only send you promotional emails if you explicitly select to receive these (you opt in). If you would prefer not to receive information from the Conveyancing Direct Ltd or carefully selected third parties you can opt out by contacting Conveyancing Direct Ltd, by emailing [dataprotection@cdpll.co.uk](mailto:dataprotection@cdpll.co.uk)

### **11.2 By post**

We only send you promotional postal mail if you explicitly select to receive these (you opt in). If you would prefer not to receive information from the Conveyancing Direct Ltd or carefully selected third parties you can opt out by contacting Conveyancing Direct Ltd, by emailing [dataprotection@cdpll.co.uk](mailto:dataprotection@cdpll.co.uk)

### **11.3 Telephone**

We will only contact you by phone for promotional reasons if you explicitly select to receive these (you opt in). If you would prefer not to receive information from the Conveyancing Direct Ltd or carefully selected third parties you can opt out by contacting Conveyancing Direct Ltd, by emailing [dataprotection@cdpll.co.uk](mailto:dataprotection@cdpll.co.uk)

## **12. Your statutory rights**

You have a number of rights concerning the personal information we use. These include the right to:

- ask us *for access to a copy* of your personal information we hold about you
- ask us *to correct* your personal information
- ask us *to delete* your personal information
- *withdraw your consent* to use your personal information

Where you have provided consent for our processing of your personal data, you may withdraw that consent at any time. If you withdraw your consent, your previous consent will remain valid in respect of our use of your data in relation to any service we are still contracted to provide.

If you would prefer not to receive information from Conveyancing Direct Property Lawyers Limited or carefully selected third parties you can opt out by contacting us at [enquiries@cdpll.co.uk](mailto:enquiries@cdpll.co.uk), or by emailing <https://managepreferences.co.uk/sequence>

We will act to respond to your request to stop receiving promotional email, phone, text or postal messages from Connells Group as quickly as is practicable (around 10 working days, as systems take time to replicate). We will keep information for record keeping purposes, to ensure we fulfil your request not to send particular types of messages.

- ask us to *restrict the use* of your personal data, including direct marketing
- *object to* our use of your personal data
- *object to an automated decision*, including profiling (for example, in terms of credit risk)
- *lodge a complaint* with the Information Commissioner's Office, if you object to the way we use your personal information. For more information please go to [www.ico.org.uk](http://www.ico.org.uk)

If you wish to make a request for access to a copy of your personal data, please write to the Connells Group at Group Legal Services, Bridgegate House, 5 Bridge Place, Lower Bridge Street, Chester CH1 1SA or email [DSAR@connells.co.uk](mailto:DSAR@connells.co.uk)

If you wish to exercise any of your other rights, please write to the Connells Group Data Protection Officer at Connells Group, Cumbria House, 16-20 Hockliffe Street, Leighton Buzzard, Bedfordshire, LU7 1GN or e mail [DPO@connellsgroup.co.uk](mailto:DPO@connellsgroup.co.uk)

We will acknowledge your request and let you know what we will need from you to carry out your request. Every effort will be made to respond to or comply with your request as quickly as possible, and we will ensure our systems are updated as soon as is practicable in response to your request.

### **13. Our use of cookies**

A cookie is a small file placed on your device when you visit a website that can be understood by the site that issued the cookie. We use the information collected by cookies to remember who you are to log you in and to store your preferences when using a particular site. It may contain a unique identifier to ensure that you are not shown the same information and/or are only shown information you have stated that you are interested in.

Our security software may use your IP address and browser version to help protect our systems and provide diagnostic information in the case of an issue.

Further information about our use of cookies is provided in our Cookies Policy

### **14. How we protect your information**

We store your personal information on our computer systems and in our paper records.

We have implemented strict security procedures to ensure that personal information is not damaged, destroyed or misused, and to prevent unauthorised access to your information.

The information that we collect is stored in a secure facility with restricted physical access.

We also use a number of security measures to prevent electronic access.

Where - in line with this Privacy Notice - information is shared with third parties, similar security measures are used to protect your information.

## **15. Data Transfers**

If we need to transfer data outside the European Economic Area (EEA) and the country it's transferred to is not on an approved list for having adequate security controls in place, we will limit when we do this and the amount of personal data we send. We will also ensure that there is adequate protection in place before sending anything to other countries outside the EEA by imposing contractual obligations on the recipients to ensure the security and confidentiality of your data.

## **16. Children's privacy**

We do not offer any products or services to children. In certain circumstances (for example a mortgage application) we may need to collect the name and date of birth of children from mortgage applicants, and share this with the selected mortgage provider.

## **17. Links to other websites**

Our websites, other electronic portals and documentation may provide links to other websites for your convenience and information. These may operate independently from us and have their own privacy notices or policies, which we strongly suggest you review.

Where linked websites are not owned or controlled by us, we are not responsible for their content or data privacy practices.

## **18. Our Promise to you**

When you provide us with this information, you agree to the collection, use and sharing of your information in accordance with this data privacy notice. Our promise to you is that

- You are in control of your data
- You can change your privacy settings at any time
- If you don't think the data is correct tell us and we'll put it right
- We will keep your data secure
- We also promise to collect, process store and share your data safely and securely and to make sure the businesses we work with do the same

## **19. Updates to our Privacy Notice**

We will occasionally update our Privacy Notice, so we suggest that you review this Notice from time to time. If we make substantial changes to our Privacy Notice, we will endeavour to inform you directly about these changes.

Last updated: May 2021