

## **PRIVACY POLICY**

### **1. About us**

In this policy, "we", "us" and "our" refer to Right Choice Conveyancing Ltd.

We are registered in England and Wales under registration number 06812995 and our registered office is at Thistle Down Barn, Holcot Lane, Sywell, Northampton, Northants, NN6 0BG. Our principal place of business is at Noble House, Capital Drive, Linford Wood, Milton Keynes, MK14 6QP.

We are regulated by the Council for Licensed Conveyancers and our registration number is 11368. We are registered with the Information Commissioner's Office under registration number Z1729370.

Our Compliance Team are responsible for all data protection issues and their contact details are below.

You can contact us:

- (a) using our website contact form;
- (b) by post, to our Milton Keynes address;
- (c) by telephone, on the contact number published on our website from time to time; or
- (d) by email, to our Compliance Team ([compliance@rightcc.co.uk](mailto:compliance@rightcc.co.uk))

### **2. What information do we collect about you?**

This will depend on what you have asked us to do or what we are contracted to do for you and this policy is intended for clients and prospective clients only. This data may be provided by you directly or may be passed to us by third parties to enable us to carry out legal work on your behalf. Third parties may include, for example, organisations who have referred work to us or banks and building societies.

Examples of the types of information we may hold about you include, but are not limited to, your names, address, contact numbers and email addresses, employment status, identity information and financial information (including extracts or copies of bank statements).

### **3. How we use your personal data**

We are asking you to provide us with your personal data to allow us to provide an estimate for our services and to carry out your conveyancing. The legal basis for this processing is our legitimate interests, namely the proper administration of our business, the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract. We also have a statutory obligation to retain records concerning Anti-Money Laundering checks that we have to carry out against all clients.

There may be circumstances, in carrying out your conveyancing, where we may need to disclose some information to third parties; for example, providers of identity verification, law firms acting on the other side or HM Revenue & Customs regarding Stamp Duty Land Tax.

We may also process your personal data where it is necessary for compliance with a legal obligation to which we are subject, or to protect your interests or the interests of another natural person.

We may process and disclose any of your personal data where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

### **4. International transfers of your personal data**

Your personal data will not be transferred to countries outside the European Economic Area (EEA).

### **5. Retaining and deleting personal data**

Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

Notwithstanding the other provisions of this Section, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

If we provide you with an estimate for our services and you decide not to instruct us, we will retain your data for 6 months after the date of the estimate. If you instruct us to carry out conveyancing on your behalf, if your matter falls through or completes, we will retain your data for a maximum of 15 years.

## **6. Amendments**

We may update this policy from time to time by publishing a new version on our website.

You should check this page occasionally to ensure you are happy with any changes to this policy.

## **7. Your rights and making a Subject Access Request**

You may instruct us to provide you with any personal information we hold about you; provision of such information will be subject to:

- (a) completion of notice to us via a Subject Access Request (SAR) (provided on request)
- (b) the supply of appropriate evidence of your identity, as detailed on the SAR

It may be necessary to request further information to clarify specifics of your request; this will be notified to you as soon as realistically possible following receipt of your request.

The Company reserves the right, where a SAR is manifestly unfounded or excessive, to charge a reasonable fee for the administrative costs of responding to the request, or we may refuse to act on the request. If a charge is to be made, you will be advised and provided with payment details at the time. We may withhold personal information that you request to the extent permitted by law.

If you believe that we have not complied with your data protection rights, you can make a complaint to the Information Commissioner's Office. ([www.ico.org.uk](http://www.ico.org.uk))

Requests may be made by you personally or by a third party e.g. a solicitor acting on your behalf. We will request evidence that the third party is entitled to act on your behalf if this is not provided at the same time as the request is made.

## **8. Information you are entitled to**

When you make a subject access request, you will be informed of:

- whether or not your data is processed and the reasons for the processing of your data
- the categories of personal data concerning you
- where your data has been collected from if it was not collected from you
- anyone who your personal data has been disclosed to or will be disclosed to, including anyone outside of the EEA and the safeguards utilised to ensure data security
- how long your data is kept for (or how that period is decided)
- your rights in relation to data rectification, erasure, restriction of and objection to processing
- your right to complain to the Information Commissioner if you are of the opinion that your rights have been infringed
- the reasoning behind any automated decisions taken about you.

## **Using our Website**

We are committed to safeguarding the privacy of our website visitors and service users (users).

By using our website and agreeing to this policy, you consent to our use of cookies in accordance with the terms of this policy.

### **1. How we use your personal data**

We may process data about your use of our website ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system. This usage data may be processed for the purposes of analysing the use of the website and services. The legal basis for this processing is our legitimate interests, namely monitoring and improving our website and services.

We may process information contained in any enquiry you submit to us regarding our services ("**enquiry data**"). The enquiry data may include for example, your name, email address, residential address and details about the property in question. Enquiry data may be processed for the purposes of providing our services and communicating with you. The legal basis for this processing is our legitimate interests, namely the proper administration of our business, the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

We may also process any of your personal data identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

In addition to the specific purposes for which we may process your personal data as set out, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or to protect your vital interests or the vital interests of another natural person.

### **Please do not supply any other person's personal data to us via our website contact form**

In addition to the specific processing purposes set out, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

### **2. Retaining and deleting**

Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

We will retain your personal data as follows:

- (a) **Usage Data** will be retained for a period of 12 month following website use.
- (b) **Enquiry Data** will be retained for a maximum period of 12 months following receipt of enquiry.

Notwithstanding the other provisions of this Section, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

### **3. Cookies**

Cookies are small text files (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server. They help the site provide a better user experience. In general, cookies are used to

retain user preferences, store information for things like shopping carts, and provide anonymised tracking data to third party applications like Google Analytics. As a rule, cookies will make your browsing experience better. However, you may prefer to disable cookies on this site and on others.

For further information visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org)