

# Dorling Cottrell Limited Privacy Notice

## Introduction

This website is operated by Simplify Moving Limited on behalf of Dorling Cottrell Limited. Dorling Cottrell Limited is a registered company in England and Wales under company number 07947316 and with our registered office at Grant Hall, Parsons Green, St Ives, Cambridgeshire, PE27 4AA (“DC” “we”, “us” or “our” in this policy).

This privacy notice sets out how Premier Property Lawyers Limited (“DC”, “we”, “us” or “our” in this notice) will use your personal data. Personal data is data which, by itself or with other data available, can be used to identify you (the client, “you”, “your”). DC is the data controller. If you have any questions or concerns about how your personal data is being used, you can contact DC’s Data Protection Officer (DPO) by letter at Grant Hall, Parsons Green, St Ives, Cambridgeshire, PE27 4AA or by emailing [Dataprotection@dclaw.co.uk](mailto:Dataprotection@dclaw.co.uk).

Where DC is acting for two or more people in a transaction, this privacy notice applies to each person separately. Where we are not acting directly for the registered proprietor, for example an executor or an attorney, this notice will apply both equally to all lawful representatives who have instructed us and the individuals named on the title.

This privacy policy relates to our use of any personal information you provide to us through this website and any other electronic communications networks such as emails, social media, web chat, SMS etc.

## The types of personal data we collect and use

Whether or not you become a customer of DC we may use your personal data for the reasons set out below. If you become a customer DC will use it to either provide the conveyancing services to you or to fulfil our contract with you. DC will collect most of the data directly but information collected both directly and indirectly are mentioned in this statement.

- Full name and personal details including contact information (e.g. work and home address and address history, work and personal email addresses, home, work and mobile telephone numbers);
- IP address/location
- Date of birth (for identity purposes and to ensure you are of an age to purchase a property in the UK);
- National Insurance Number and Passport number for identity and Land Tax obligations
- Financial details (e.g. sources of income, evidence of source and proof of funds and details of banks accounts held by you);
- Records of the services you have obtained or applied for, how you use them and the relevant technology used to access or manage them (e.g. mobile phone location data, IP address, MAC address);
- Biometric data (e.g. voice recording for voice recognition);
- Information from fraud prevention agencies, credit reference agencies, electoral roll, court records of debt judgements and bankruptcies and other publicly available sources;

- Family, lifestyle or social circumstances if relevant to the transaction (e.g. number of adult occupiers);
- Employment details/employment status for anti-money laundering and fraud prevention purposes;
- Personal data about others. You must have their authority to provide their personal data to DC and share this privacy notice with them beforehand.

### **Providing your personal data**

We will tell you if providing some personal data is optional, including asking for your consent to process it. In all other cases you must provide your personal data to enable DC to provide services to you.

### **Monitoring of communications**

Subject to applicable laws, DC may monitor and record your calls, emails, text messages, social media messages and other communications in relation to your dealings with us. DC will do this for regulatory compliance, self-regulatory practices, crime prevention and detection, to protect the security of our communication systems and procedures, to check for obscene or profane content, for quality control and staff training. DC also monitors activities on your file where necessary for these reasons and this is justified by DC's legitimate interests and legal obligations.

### **Using your personal data: the legal basis and purposes**

DC processes your personal data for the following reasons:

1. As necessary to perform its contract with you for the relevant conveyancing transaction:
  - a) To take steps at your request prior to entering into it;
  - b) To allow you to decide whether to enter into it;
  - c) To manage and perform that contract;
  - d) To update your records; and
  - e) To trace your whereabouts and to contact you about any post completion matters that may arise and to recover debt or return monies to you.
2. As necessary for DC's own legitimate interests or those of other persons and organisations, for example:
  - a) For good governance, accounting and managing and auditing of our business operations;
  - b) To monitor emails, calls, other communications, and activities on your conveyancing file.
  - c) For market research, analysis and developing statistics;
  - d) To send you marketing communications;
  - e) To monitor the progress of your conveyancing case; and
  - f) To enable satisfaction surveys to be conducted.
  - g) To use artificial intelligence, machine learning and trained reviewers to process information to improve our services to you, to troubleshoot and train our staff. These tools are used on data collected directly and indirectly over electronic communication, call recording and post.
3. As necessary to comply with a legal obligation, for example:
  - a) When you exercise your rights under data protection law and make requests;
  - b) For compliance with legal and regulatory requirements and related disclosures;
  - c) For establishment and defence of legal claims;

- d) For activities in relation to the prevention, detection, and investigation of crime;
  - e) To verify your identity, make fraud prevention and anti-money laundering checks; and
  - f) To monitor emails, calls, other communications, and activities on your conveyancing file.
4. Based on your consent, for example:
- a) When you request DC to disclose your personal data to other people or organisations, such as a company handling a claim on your behalf, or otherwise agree to disclosures;
  - b) When DC process any special categories of personal data about you at your request (e.g. biometric data, data concerning your health); and
  - c) To send you marketing communications where we have asked for your consent to do so, please note that you are free at any time to change your mind and withdraw your consent. The consequence might be that we cannot do certain things for you.

You must provide your personal data to enable DC to carry out the conveyancing transaction. DC will tell you if providing some personal data is optional, including asking for your consent to process it in all other cases.

### **Sharing of your personal data**

#### **Subject to applicable data protection laws we may share your data with:**

- The Simplify group of companies of which DC is a member of. Simplify provides services to DC including the provision of staff, office premises, desks, computers and IT support and so has access to all of the personal data you provide us;
- DC's group of companies which means our subsidiaries, our ultimate holding company and its subsidiaries;
- Sub-contractors and other persons who help us provide the conveyancing transaction;
- Companies and other persons or agencies providing services to us including but not limited to electronic and facial recognition ID verification and bank/funding validation providers;
- Our legal and other professional advisors, including our auditors and our professional indemnity insurer;
- Fraud prevention agencies, credit reference agencies and debt collection agencies when you instruct us to act, and periodically during the conveyancing transaction;
- Government bodies and agencies in the UK and overseas (e.g. HMRC and Welsh Revenue Authority, who may in turn share it with relevant overseas tax authorities), the Land Registry, and with our regulators (e.g. The Council for Licensed Conveyancers and the Information Commissioner's Office);
- Courts, to comply with legal requirements, and for the administration of justice;
- In an emergency or to otherwise protect vital interests;
- To protect the security or integrity of our business operations;
- To other parties connected with your conveyancing transaction, including but not limited to: Lenders, Restriction and Charge Holders, Help To Buy agents, Estate Agents, Brokers, other side legal representatives;
- To the introducer who introduced your case to DC;
- To Lender Panels who manage conveyancing cases on behalf of your Lender (if applicable);
- When we restructure or sell our business or its assets or re-organise or merge;

- Market research organisations who help to improve our services;
- Payment systems (e.g. Sage Pay and World Pay Limited) and to banks who may transfer your personal data to others as necessary for regulatory purposes, to process transactions, to resolve disputes and for statistical purposes, including sending your personal data overseas; and,
- Anyone else, where we have your consent or as required by law.

### **How you use our website (analytics)**

You can visit our website without giving away your personal information. DC uses Google Analytics and Cookies in order to improve our service, user experience and analyse how the website is used. Aside from the approximate location (IP address), the information collected by Google Analytics is mostly anonymous traffic data including browser information, device information, language.

We do not collect additional information, such as your age, gender, interests or bank details. We use cookies to profile some of the data we collect to enable us to test and analyse how audiences interact with the DC website and to make informed decisions about how to provide a better experience for visitors to our website.

### **International transfers**

Information which you provide to us is stored on our secure servers located in the UK. However, data that we collect from you may be also transferred to, or processed in, a destination outside the UK. We have operations centres in India which access, and process data and we engage some third parties that may store or process personal data outside of the UK. Where it is transferred outside the UK we will take all steps reasonably necessary to ensure that your information is treated securely and in accordance with our Privacy Notice. If you require further information as to where your personal data is transferred to, and the measures we have implemented to safeguard that information, please contact our Data Protection Officer by emailing [Dataprotection@dclaw.co.uk](mailto:Dataprotection@dclaw.co.uk)

### **Identity verification and fraud prevention checks**

The personal data we have collected from you will be shared with fraud prevention agencies who will use it to prevent fraud and money laundering and to verify your identity. If fraud is detected, you could be refused certain services, finance or employment in the future. Further details of how your information will be used by us and these fraud prevention agencies, and your data protection rights, can be obtained by emailing [Dataprotection@dclaw.co.uk](mailto:Dataprotection@dclaw.co.uk)

### **Credit Reference Agencies**

In order to process your transaction and comply with our legal obligations, DC perform identity checks on you through credit reference agencies. To do this, DC supply your personal data to the credit reference agency and they will give DC information about you. The credit reference agencies may check the details against any databases (public or otherwise) to which they have access. They may also use your personal details in the future to assist other companies for verification purposes. A record of the search will be retained by both us and the credit reference agencies. This has no effect on your credit score, and lenders are unable to see this. Further details of how your information will be used by DC and the credit reference agencies can be obtained by emailing [Dataprotection@dclaw.co.uk](mailto:Dataprotection@dclaw.co.uk).

### **What if I am aged 18 or under?**

If you are aged 18 or under please get your parent/guardian's prior permission whenever you provide personal information through the website. Users without this consent are not allowed to provide us with personal information. Please note that individuals under 18 are unable to purchase a property in the United Kingdom.

### **Direct Marketing Communications**

If you have chosen to opt-in to our direct marketing communications, we will use your information to tell you about products and services available from us which may be of interest to you. We may also use your information to tell you about products and services we can introduce from selected businesses.

You have a right to opt-out of our direct marketing communications at any time. You can opt out by following the Unsubscribe instructions at the bottom of the communication or by emailing [dataprotection@dclaw.co.uk](mailto:dataprotection@dclaw.co.uk)

### **Links to websites of other providers third parties**

Please note that this data privacy policy only applies to DC and we are not responsible for, and have no control over, information that is submitted to or collected by third parties, such as those where our websites may provide links and banner advertisements to third party sites. Since we do not control those websites, you are responsible for reviewing and abiding by the privacy policies of these third-party sites to ensure they comply with the applicable data protection regulations.

We accept no responsibility or liability for the contents of any website to which a link exists and give no representation or warranty as to the information on such websites. We accept not responsibility or liability for any loss arising from any contract entered into with any website to which a link exists.

### **Survey and Competitions**

We will treat any survey or competition information you provide with the same high standard of care as we do all personal data, using any details provided strictly within the terms of the competition and this Privacy Statement.

### **Cookies**

Please refer to our cookie policy for information about cookies, what they are used for and your rights to object to them.

### **How long will the data be stored for?**

Where possible, we will take steps to erase any personal data that is no longer necessary for the purposes for which it is collected or otherwise processed, or if you have withdrawn consent for its processing and retention.

### **Criteria used to determine retention periods**

The following criteria are used to determine data retention periods for your personal data, whether you instruct DC or not:

- **Retention in accordance with legal and regulatory requirements:** DC will retain your personal data after completion of your conveyancing transaction based on DC's legal and

regulatory requirements.

- **Retention in case of claims:** DC will retain your personal data for as long as you may bring a legal claim.
- **Retention in case of queries:** DC will retain your personal data for as long as we are legally able to do so to enable us to deal with any queries you may have in relation to the conveyancing transaction or quote.

### **Your responsibility**

It is your responsibility to ensure that your computer is virus protected. We accept no responsibility for any loss you may suffer as a result of accessing and downloading information from this site.

### **Your rights under applicable data protection law**

Your rights are as follows (please note that these rights do not always apply in all circumstances):

- The right to be informed about how we are processing your personal data;
- The right to have your personal data corrected if it is inaccurate and to have incomplete personal data completed;
- The right to object to processing of your personal data;
- The right to restrict processing of your personal data;
- The right to have your personal data erased;
- The right to request access to your personal data and information about how we process it;
- The right to move, copy, transfer your personal data (“data portability”); and
- Rights in relation to automated decision-making including profiling.

If you would like to exercise any of the above rights, please contact our Data Protection officer in writing:

Data Protection Officer

Dorling Cottrell Limited

Grant Hall

Parsons Green

St Ives

PE27 4AA

[Dataprotection@dclaw.co.uk](mailto:Dataprotection@dclaw.co.uk)

### **Right to Complain**

You have the right to complain about Data Protection to DC’s supervisory authority the Information Commissioner’s Office (ICO). It has enforcement powers and can investigate compliance with data protection laws. You can contact the ICO on 0303 123 1113 or by visiting their website:

<https://ico.org.uk>.

### **Data Anonymisation and aggregation**

Your personal data may be converted into statistical or aggregated data which can not be used to identify you, then used to produce statistical research and reports. This aggregated data may be shared and used in all the ways described above.

### **Group Companies**

For more information on the Simplify group companies, please contact [Dataprotection@dclaw.co.uk](mailto:Dataprotection@dclaw.co.uk)

### **Changes to the Privacy Policy**

This policy will be reviewed, and may change, from time to time as a result of further development of our website, changes to legislation or the implementation of new technologies. DC reserves the right to change this data protection information at any time with effect for the future. The revised policy will be posted to this page so that you are always aware of the information we collect, how we use it and under what circumstances we disclose it. We therefore recommend you read the current data protection information again from time to time.

Last updated: September 2024

Date of Next Review: September 2025