

PROGENY CORPORATE LAW – PRIVACY POLICY

Progeny Corporate Law respects your privacy and is committed to protecting your personal data. This privacy notice will tell you how we look after your personal data and about your privacy rights and how the law protects you.

1. IMPORTANT INFORMATION AND WHO WE ARE

Progeny Corporate Law (“we”, “us” or “our”) is the controller and responsible for your personal data.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact our DPO: Jonathan Crew - jonathan.crew@theprogenygroup.com

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes mortgage details, cashback payments, discount schemes/incentives relating to property purchases, bank accounts and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of services we have provided you with.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership, information about your health). Nor do we collect any information about criminal convictions and offences.

IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have with you (for example, to provide you with services). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data about you including, through direct interaction with you. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you: request our services; subscribe to our publications; request marketing information to be sent to you; or give us some feedback. We may in some cases consult credit reference agencies in order to assess your credit worthiness.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data where we need to perform the contract we are about to enter into or have entered into with you, where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests and where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We will process your personal data:

- 1) As necessary for the performance of our contract with you when providing you with services:
 - a) To manage and perform the contract;
 - b) To update our records; and
 - c) To trace your whereabouts and recover any debt.
- 2) As necessary for our own legitimate interests:
 - a) For good governance, accounting, and managing and auditing our business operations;
 - b) To monitor emails, calls, other communications and activities;
 - c) To send you marketing communications;
 - d) To search at credit reference agencies;
 - e) To comply with requests received from your lender (where we act on behalf of the lender too); and
 - f) Where we are subject to Law Society approved Consultants/Assessors periodically checking our client files.
- 3) As necessary to comply with a legal obligation:
 - 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 rights;
 - d) For activities relating 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 relating to your file.
- 4) Based on your consent:
 - a) When you request to the disclosure of your personal data to other people or organisations;
 - b) When we process any special categories of personal data at your request (e.g. racial or ethnic origin, data concerning health, religious or philosophical beliefs); and
 - c) To send you marketing communications where we have your consent to do so.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

PROMOTIONAL OFFERS FROM US

We may use your Identity, Contact, Technical and Usage Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services may be relevant for you. You will receive marketing communications from us if you have so requested or purchased services from us and you have not opted out of receiving marketing.

OPTING OUT

You can ask us to stop sending you marketing material at any time by emailing: charlotte.dobson@theprogenygroup.com

Where you opt out of receiving marketing material, this will not apply to personal data provided to us as a result of any other transaction such as the provision of services under a contract.

CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will 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.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data with third parties as set out below:

- The Progeny group of companies (where we have a legitimate interest to do so);
- Sub-contractors and other persons who help us to provide services to you;
- Our legal and professional advisers, experts, auditors, lawyers and insurers;
- Fraud prevention agencies, credit reference agencies, debt collection agencies, personal search agencies, local authorities, lenders;
- Government bodies and agencies in the UK (e.g. tax authorities, the Information Commissioner's Office, HM Revenue & Customs, HM Land Registry);
- Courts, to comply with legal requirements and for the administration of justice;
- Other parties where necessary to protect the security and integrity of our business operations; and
- Third parties to whom we may 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.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. 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. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. We have also 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.

7. DATA RETENTION

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. We retain all information relating to your file (including Contact, Identity, Financial and Transaction Data) for a period of six years from the date of conclusion for regulatory purposes. In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

8. YOUR LEGAL RIGHTS

You have the right to:

- **Request access** to your personal data and information about how it is processed;
- **Request correction** of the personal data that we hold about

you if it is incomplete or inaccurate;

- **Request erasure** of your personal data (the "right to be forgotten");
- **Object to processing** of your personal data;
- **Request restriction of processing** of your personal data;
- **Request the transfer** of your personal data to a third party; and
- **Withdraw consent at any time** where we are relying on consent to process your personal data.

You also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.