

## PRIVACY NOTICE

The General Data Protection Regulation (the “**GDPR**”) seeks to protect and enhance the rights of data subjects. Key Property Lawyers is committed to protecting and respecting your privacy. Key Property Lawyers recognises the importance of the correct and lawful treatment of personal information, and will only use personal information as set out in this Privacy Notice.

This Privacy Notice sets out how Key Property Lawyers collects and uses any information that you give us. The expressions “**we**”, “**us**” and “**our**” refer to Key Property Lawyers.

We have appointed a Privacy Officer to oversee compliance with this Privacy Notice. If you have any questions about this Privacy Notice or how we handle your personal information, please contact the Privacy Officer at: toby@keypropertylawyers.co.uk, or by post to: Barley Lodge, 51a Bristol Road, Keynsham, Bristol, BS31 2BP.

It is important that you read this Privacy Notice, together with any Key Property Lawyers terms and conditions that we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such personal information. This Privacy Notice supplements the other notices and is not intended to override them.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

### **Who are we?**

Key Property Lawyers Limited is a registered company, based in England under company number 6694038, with its registered office at 30-31 St James Place, Mangotsfield, Bristol, BS16 9JB.

### **In what capacity will Key Property Lawyers hold personal information about you?**

During the course of providing its services, Key Property Lawyers, compile and hold certain personal information about living individuals for the purposes of correspondence and to meet Money Laundering regulations.

### **How is your personal information collected?**

We use different methods to collect personal information from and about you.

**Directly from you:** Typically the personal information that we collect about you will be the personal information that you provided on your questionnaire. In some instances, however, it could be provided in other electronic formats, or in other communications which may be in writing, by telephone, via the internet or by any other means.

**From third parties:** We will also gather personal information from other sources, including Estate Agents.

## **What personal information will Key Property Lawyers hold about you?**

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 information about you, as follows:

- full name and title
- contact information including email addresses and postal addresses, telephone numbers and fax numbers
- date of birth
- identification or supporting documents (such as passport, driving license, birth certificate, utility bill etc.)
- gender
- bank details

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data).

## **How will Key Property Lawyers use personal information held about you?**

We will only use your personal information when the law allows us to.

We will use your personal data where we need to: (a) in order to meet our contractual obligations under our agreement with you; (b) 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; or (c) where we need to comply with a legal or regulatory obligation. In summary this means we use your personal information to enable us to facilitate the exchange of instructions, documentation and information between the law firm and the Lender; establish, maintain and support an industry-wide conveyancing panel management database; support the validation of information and data; and provide transactional functionality in respect of the conveyancing process.

We do not rely on consent as a legal basis for processing your personal information other than in relation to sending third party direct marketing communications to you. You have the right to withdraw consent to marketing at any time by contacting us at [toby@keypropertylawyers.co.uk](mailto:toby@keypropertylawyers.co.uk), or by post to: Privacy Officer, Tobias Richmond, Key Property Lawyers Ltd, Barley Lodge, 51a Bristol Road, Keynsham, Bristol, BS31 2BP

Most commonly, we will use your personal information in the following circumstances and for the purposes of:

### **Purpose/Activity**

Establishing and administering a conveyancing database  
Internal record keeping

### **Lawful basis for processing**

- (a) Performance of a contract with you
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(b) Necessary to comply with a legal obligation
- (c) Necessary for our legitimate interests

Review by Lenders to update their records and to allow them to approve law firms and employees, members or partners of law firms to use the Website	(a) Performance of a contract with you
Undertaking checks with third parties	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation
Assessing lending and insurance risks	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation
Contacting any third parties mentioned by you on your application form/provision of information to obtain further information, references or clarification on the data provided	(a) Performance of a contract with you
Prevention and detection of crime (and the prosecution of criminal activities)	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (for running our business)
Progressing conveyancing transactions	(a) Performance of a contract with you
Developing or progressing development with mortgage, conveyancing, law firm and Lender processing systems <input type="checkbox"/>	(a) Performance of a contract with you
Compliance with applicable laws and regulations <input type="checkbox"/>	(a) Necessary to comply with a legal obligation
Processing payment for the purchase of products and/or services <input type="checkbox"/>	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
Undertaking anti-money laundering, identity and credit checks <input type="checkbox"/>	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation
Providing this information to agents or subcontractors so that they can assist us	(a) Necessary for our legitimate interests (for running our business, provision of

### **Change of purpose**

We will only use your personal information 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

information 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 information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### **Disclosure of your personal information**

Key Property Lawyers may share the personal information that it has about you with Lenders and with any organisation the Lender may appoint to carry out the services in the future (collectively, the “**Relevant Parties**”).

If you give us personal information regarding another person, you are confirming they have given you permission to provide their personal information to us to be able to process their personal information and also that you have advised them that their personal information will be passed to Key Property Lawyers.

## **What happens if you choose not to provide us with personal information or are unable to provide us with personal information?**

If you fail to provide certain personal information when requested, we may not be able to perform the agreement we have entered into with you, or we may be prevented from complying with our legal obligations.

## **What are your rights relating to the use of your personal information?**

Under the GDPR, you have certain rights in respect of the processing of your personal information, which may vary dependent on the legal basis for collection of your personal information and the uses made of this personal information.

For all uses made of your personal information you have the right to be informed about how we use your personal information, and this notice discharges that obligation. However, further rights may apply in different circumstances, as set out below:

Right of access- you have a right to access a copy of the personal information that is held about you (subject to Data Protection Laws).

Right of rectification- you have a right to correct personal information that is held about you if it is inaccurate or incomplete.

Right to be forgotten- in certain circumstances you can ask for the personal information held about you to be erased (please note our retention period set out below).

Right to restrict processing- where certain conditions apply you have a right to restrict processing (please note this may impact our ability to provide our services to you or your law firm).

Right to data portability- you have the right to have the personal information held about you to be transferred to another organisation, where applicable Key Property Lawyers will provide copies of personal information in a structured commonly used, and machine readable form.

Right to object- you have the right to object to certain types of processing, such as marketing (please note that we will only ever use your contact information for marketing purposes where you have provided express consent).

Right to withdraw consent- In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact [toby@keypropertylawyers.co.uk](mailto:toby@keypropertylawyers.co.uk) , or by post to: Privacy Officer, Tobias Richmond, Key Property Lawyers, Barley Lodge, 51a Bristol Road, Keynsham, Bristol, BS31 2BP.

In the event you wish to exercise any of these rights, please make your request in writing to Key Property Lawyers's Privacy Officer.

## **How long will Key Property Lawyers retain your personal information for?**

We will only retain your personal information for the duration of our agreement with you and 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.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes

for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

### **Security**

We have put in place measures to protect the security of your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

However the internet is not a secure medium but we are committed to ensuring that your personal information is secure. In order to prevent unauthorised access or disclosure we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the personal information we collect online. We will use our best efforts to ensure that no unauthorised parties have access to any of your personal information and we restrict access to non-public information about you to those individuals and entities that need to know the personal information to be able to provide products and services to you.

### **Further information**

In the event you have any questions about this Privacy Notice or wish to make a complaint about how your personal information is being processed by Key Property Lawyers you have the right to complain to the Privacy Officer, by email to: [toby@keypropertylawyers.co.uk](mailto:toby@keypropertylawyers.co.uk) , or by post to: Privacy Officer, Tobias Richmond, Key Property Lawyers, Barley Lodge, 51a Bristol Road, Keynsham, Bristol, BS31 2BP.

You have the right to make a complaint at any time to the relevant supervisory authority. The UK supervisory authority for data protection issues is the Information Commissioner's Office (ICO).