

LMS Privacy Notice

Introduction

Welcome to the Legal Marketing Services Ltd's privacy notice.

Legal Marketing Services respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our websites (regardless of where you visit them from) and tell you about your privacy rights and how the law protects you.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below. Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

1. [Important information and who we are](#)
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1. Important information and who we are

Purpose of this privacy notice

This privacy notice aims to give you information on how Legal Marketing Services Ltd collects and processes your personal data through your use of its websites, including any data you may provide through the websites when you register with us, sign up, a product or service, take part in a survey or provide outsourced services to us.

This website is not intended for children and we do not knowingly collect data relating to children, except in relation to minimal personal data for occupants at a property aged 17 and please refer to the section [Third Party Occupants \(Anyone living at the property over the age of 17\)](#) below, for full details.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

If you are an employee of ours, or work for us under any other contract for services, then please refer to the LMS Employee Privacy Notice for further information on how we process your data and keep it secure.

Controller

Established in 1991, Legal Marketing Services Ltd is one of the principal providers of conveyancing services to the housing industry; focussing on lenders; brokers and estate agents. We process over 100,000 conveyancing transactions a year on behalf of our partners.

Legal Marketing Services Ltd is the controller and responsible for your personal data (collectively referred to as "COMPANY", "we", "us" or "our" in this privacy notice).

We have appointed a data privacy manager (DPM) 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 the Data Privacy Manager using the details set out below.

Contact details

Our full details are:

Full name of legal entity: Legal Marketing Services Ltd

Data Privacy Manager:

Email address: dpm@lms.com

Postal address: Bickerton House, Lloyd Drive, Cheshire Oaks Business Park, Cheshire, CH65 9HQ

You 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.

Our Websites

This privacy notice covers LMS' processing of personal data through all of the websites it operates, which are available and are of use to different categories of data subject (please see below). The following websites are operated by LMS (together the '**websites**')

LMS main company website:

<https://corporate.lms.com>

Customer case tracking website:

<https://www.lms.com/trackmycase>

Solicitor portal:

<https://www.lmsuk.com/ConveyancerZone>

Broker conveyancing quotation and instruction website (also available to estate agents):

<https://www.lmsselect.com>

Broker case tracking website (though accessible to all users):

<https://lmsuk.com/casecheck>

LMS core system website access point (used by Clients and Solicitors):

<https://www.lmsuk.com/stars>

Bank Account Check website:

<https://www.lms.com/bankaccountcheck>

This privacy notice operates together with our website terms, for each of the applicable websites listed above, to protect the information you provide through the websites, manage your use of each website and to provide information on how your personal data will be used. Please refer to each link above for the applicable website terms.

Changes to the privacy notice and your duty to inform us of changes

This version was last updated on 29 May 2019.

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

This privacy notice is intended to provide clarity around how we will use your personal data and keep it secure. Please note that you have specific rights ([See below](#)) in relation to the control and use of your personal data, including choosing not to provide requested information on our websites. However, if you do not provide

information where requested this may restrict your access to our services, including via the websites, as well as affecting your use, and performance of, our websites. However, we will notify you of this at the time.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our websites, we encourage you to read the privacy notice of every website you visit.

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 bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from or supplied to us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password for our websites, your feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

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). Nor do we collect any information about criminal convictions and offences.

Special Category Data from third parties

As part of providing our services to our Clients, our partnership with our Professional Service Providers (**PSP's**), we may receive Special Category data, in relation to Customers, which has been collected by our Clients or PSP's directly from you as part of loan applications, purchase process or other specific instruction. In all cases we rely on our Clients and PSP's to establish a legal basis for processing your special category data and ensuring that they may share it with us. However, we do ensure we have appropriate contracts in place with these third parties and will treat all such personal data received in accordance with this privacy notice.

3. Different Categories of Data Subject and How Your Data is Collected

Borrowers/Customers

As part of our services to our Clients, we make available to customers and borrowers of these Clients (the 'Customers') services to assist with management and tracking of your loan applications. With our simple-to-use case tracking service, you can easily keep up to date online with your case as it progresses, receive support and guidance as and when you need it.

We will process your Identity, Contact and Financial Information as part of filling in the forms on www.lms.com/trackmycase as well as registering with us to use the site (when will also process your Profile Information). If you contact us or request further services or information we will also process your personal data. We may also ask you for your information when you report a problem on our websites.

This personal data will include some or all of the following:

Identity Data
Contact Data
Financial Data
Transaction Data
Technical Data
Profile Data
Usage Data

We will also keep records of our correspondence, communications and meetings so we are able to monitor the services you have received and the performance of our websites.

As part of our services to our Clients, we make available to Customers services such as Bank Account Check at www.lms.com/bankaccountcheck. We will process your personal data to identify you as a genuine Customer and will request your consent to process your data for Bank Account Check.

This personal data will include some or all of the following:

Identity Data
Usage Data
Contact Data

How is your personal data collected?

We use different methods to collect data from and about you including through:

Direct interactions. You may give us your Identity, Contact and Financial Data by registering on our website, filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- create an account on our website;
- subscribe to our services;
- use a service;
- request marketing to be sent to you;
- enter a survey; or
- give us some feedback.

Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies. We may also receive Technical Data about you if you visit our other websites. Please see our [cookie policy](#) for further details.

Third parties or publicly available sources. We may receive personal data about you from various third parties as set out below: Technical Data from the following parties;

- Search information providers based inside the EU;
- HM Land Registry
- Royal Mail Postal Address Query
- Contact and Financial Data from providers of payment services such as Sage Pay.

Collecting Borrower Data from third parties

- Identity and Contact Data from publicly available sources such as the Electoral Register.
- Identity, contact, financial, transaction data from our Clients and PSP's who are providing services to you.

Applicable LMS Website(s):

www.lms.com/trackmycase

www.lms.com

www.lmsuk.com/casecheck

www.lms.com/bankaccountcheck

Third Party Occupants (Anyone living at a property over the age of 17)

As part of our services to our Clients, and to assist their Customers with their mortgage (loan) applications, we need to capture and identify the details of any people over 17 years old at the time of the mortgage and who will live at the property once the mortgage has completed, but will not be party to the mortgage (i.e. not applying for the mortgage). This information is necessary in order to progress any application.

We require the Customers to provide your name and address if you will be living at the property once a mortgage has completed, so you may be contacted directly by the lawyers and be requested to sign a form confirming you will not stay in the property if the bank re-possesses (becomes the owner) of the property. The lawyers will then contact you (the occupant) directly to provide full information on how your data will be used, and to request your consent.

When collecting your data from the Customer, we require they confirm they have obtained your permission to share this with us and we will only collect enough information so that the lawyers can contact you personally. We will always look after your information and keep it secure (as set out in this Privacy Notice).

This personal data will include some or all of the following:

Identity Data

Usage Data

Contact Data

Collecting Borrower Data from third parties: Identity and Contact Data from Customers.

If you are unsure about why we are using your data or have any other queries, please contact us customerservices@lms.com

Clients

LMS provides conveyancing and loan intermediary services to its 'lender' Clients within the financial services sector ("**Clients**")

To ensure that we provide you with the best service possible, we store the personal data of individual contacts at your organisation as well as keeping records of our conversations and meetings. From time to time, we may also ask your employees to undertake a Client satisfaction survey. We think this is reasonable - we deem these uses of your data to be necessary for our legitimate interests as a provider of conveyancing services or specifically provided for under a contract between us.

This personal data will include some or all of the following:

Identity Data of Employees

Contact Data of Employees

Technical Data

Profile Data

Usage Data

Marketing and Communications Data of employees

We use different methods to collect data from and about you including through: **Direct interactions**. Your employees may give us Identity, Contact and Financial Data by registering on our websites, filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data provided when they:

- request to receive our services;
- create an account on our website;
- subscribe to our service or publications;
- request marketing to be sent;
- respond to a survey; or
- give us some feedback.

Automated technologies or interactions. As your employees interact with our websites, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. We may also receive Technical Data about your employees if they visit our other websites. Please see our [cookie policy](#) for further details.

Third parties or publicly available sources. We may receive personal data about you from various third parties as set out below:

- Technical Data from analytics providers such as Google based outside the EU;

Collecting Borrower Data from third parties

- Information from our PSP's who are also engaged by you to provide services in relation to the Customers.

Applicable LMS Website(s):

www.lms.com/trackmycase
www.lms.com
www.lmsuk.com/casecheck
www.lmsuk.com/conveyancerzone
www.lms.com/bankaccountcheck

Professional Service Providers ('PSPs')

LMS works in partnership with PSP's (usually conveyancers, solicitors, estate agents and brokers) to meet the needs of its Clients and Customers, sometimes through outsourced service arrangements and sometimes as a service provider to PSPs who have been directly instructed by Customers.

We use and store the personal data of individuals within your organisation in order to facilitate the receipt of services from you as one of our PSP's (and, sometimes, to provide services to you). If provided by you, we will store and review any opinions provided on our services and responses to surveys. We deem all such activities to be necessary within the range of our legitimate interests as a recipient of your services or specifically provided for within contracts between us.

This personal data will include some or all of the following:

Identity Data of personnel
Contact Data
Technical Data
Profile Data
Usage Data
Marketing and Communications Data of employees

We use different methods to collect data from and about you and your employees including through: **Direct interactions**. You may give us your and/or your employees' Identity and Contact and by registering on our websites, filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data provided when you:

- provide your services to us or our clients;
- apply for our products or services;
- create an account on our website;
- subscribe to our service or publications;
- request marketing to be sent;
- enter a competition, promotion or survey; or
- give us some feedback.

Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. We may also receive Technical Data about you if you visit our other websites. Please see our [cookie policy](#) for further details.

Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources as set out below:

- Technical Data from the following parties analytics providers such as Google based outside the EU;

Collecting Data from third parties

- Identity and Contact Data from publicly available sources such as Companies House, the SRA, FLA; and
- Identity and Contact Data from our Clients.

Applicable LMS Website(s)

www.lms.com
www.lmsuk.com/stars
www.lmsuk.com/casecheck
www.lmsuk.com/conveyancerzone
www.lms.com/bankaccountcheck

Website Users

When you visit our website there is certain information that we may automatically collect, whether or not you decide to use our services. This includes your IP address, the date and the times and frequency with which you access the website and the way you browse its content. We will also collect data from you when you contact us via any of our websites (listed in Section 7 above), report problems and/or provide feedback.

This personal data will include some or all of the following:

Identity Data
 Technical Data
 Profile Data
 Usage Data

We collect your data automatically via cookies, in line with cookie settings in your browser. If you are also a Customer, PSP or Client of LMS, we may use data from your use of our websites to enhance other aspects of our communications with or service to you. If you would like to find out more about cookies, including how we use them and what choices are available to you (see below).

Cookies Policy

What's a cookie?

- A "cookie" is a piece of information that is stored on your computer's hard drive and which records your navigation of a website so that, when you revisit that website, it can present tailored options based on the information stored about your last visit. Cookies can also be used to analyse traffic and for advertising and marketing purposes.

- Cookies are used by nearly all websites and do not harm your system. If you want to check or change what types of cookies you accept, this can usually be altered within your browser settings.

How do we use cookies?

- We use cookies to do two things:
 - to track your use of our websites. This enables us to understand how you use the sites and track any patterns that emerge individually or from larger groups. This helps us to develop and improve our websites and services in response to what our visitors want and need; and
 - to provide information on our services contract, hopefully means less time spent trawling pages and more time on the things that matter.
- Cookies are either:
 - Session cookies: these are only stored on your computer during your web session and are automatically deleted when you close your browser - they usually store an anonymous session ID allowing you to browse a website without having to log in to each page but they do not collect any information from your computer; or
 - Persistent cookies: a persistent cookie is stored as a file on your computer and it remains there when you close your web browser. The cookie can be read by the websites that created it when you visit that website again. We use persistent cookies for Google Analytics and for personalisation (see below).
- Cookies can also be categorised as follows:
 - Strictly necessary cookies: These cookies are essential to enable you to use the websites effectively, such as when registering on our websites, and therefore cannot be turned off. Without these cookies, the services available to you on our websites cannot be provided. These cookies do not gather information about you that could be used for marketing or remembering where you have been on the internet.
 - Performance cookies: These cookies enable us to monitor and improve the performance of our websites. For example, they allow us to count visits, identify traffic sources and see which parts of the site are most popular.
 - Functionality cookies: These cookies allow our websites to remember choices you make (such as your user name, language or the region you are in) and provide enhanced features. For instance, we may be able to provide you with news or updates relevant to the services you use. These cookies can also be used to remember changes you have made to text size, font and other parts of web pages that you can customise. They may also be used to provide services you have requested such as viewing a video or commenting on a blog. The information these cookies collect is usually anonymised.
 - Personalisation cookies: These cookies help us to provide our services specific to you. These cookies are persistent (for as long as you are registered with us) and mean that when you log in or return to the websites, you may see information similar to that you have previously browsed.

The following Cookies are active on our websites:

Cookie	LMS Website	Purpose	More Information
CZ_AUTH	Conveyancer Zone	Authorisation cookie used for standard forms authentication. This is essential for our site to facilitate authentication.	
TrackMyCaseAUTH	Track My Case, Track My Case Remortgage Questionnaire	Authorisation cookie used for standard forms authentication. This is essential for our site to facilitate authentication.	
.ASPAUTH	LMS Select	Authorisation cookie used for standard forms authentication. This is essential for our site to facilitate authentication.	
TMC_Site	Track My Case Remortgage Questionnaire		
SELECT	LMS Select	This facilitates custom session management.	

Cookie	LMS Website	Purpose	More Information
gbid	LMS Select	Used to persist the look and feel of the website.	
LZ_AUTH	Lender Zone	Authorisation cookie used for standard forms authentication. This is essential for our site to facilitate authentication	
StarsAUTH	Conveyancer Zone, Lender Zone	Authorisation cookie used for STARS. This is essential for our site to facilitate authentication.	
CZ_Download	Conveyancer Zone	Cookie used for download feature to signal that a document has been downloaded.	
ASP.NET_SessionId	Conveyancer Zone, Lender Zone, Track My Case, LMS Select	Framework cookie used to identify your browsing session. This is required to allow information to be transferred from page to page.	https://msdn.microsoft.com/en-us/library/ms178194.aspx
__RequestVerificationToken	Conveyancer Zone, Lender Zone, Track My Case, Lender Zone	Framework cookie used to combat forgery, to make the application safer.	
_ga	All websites	Google Analytics, for supporting vital marketing research.	https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage
_gat	All websites	Google Analytics, for supporting vital marketing research.	https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage
_gid	All websites	Google Analytics, for supporting vital marketing research.	https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage
cfid	STARS	Framework cookie used to identify your browsing session. This is required to allow information to be transferred from page to page.	
cftoken	STARS	Framework cookie used to identify your browsing session. This is required to allow information to be transferred from page to page.	

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 in the following circumstances:

- 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.
- Where we need to comply with a legal or regulatory obligation.

[Click here](#) to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally we do not rely on consent as a legal basis for processing your personal data and we do not share data with third parties for direct marketing communications.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

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. Please [contact us](#) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

- We may use Customer personal data as follows:

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you on our websites	(a) identifying information including name, username or similar identifier ('Identity Data'); and (b) contact information including address, email address and telephone number ('Contact Data').	(a) Performance of a contract with you, (b) on the basis of your consent.
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey (c) Providing access to our websites	(a) Identity Data; (b) Contact Data; (c) profile data including your username and password, your interests, preferences, feedback and survey responses ('Profile Data'); and (d) Marketing and communications information including your preferences in receiving marketing from us and your communication preferences ('Marketing and Communications Data').	(a) Performance of a contract with you, (b) the basis of your consent] (c) Necessary to comply with a legal obligation (d) Necessary for our legitimate interests (to keep our records updated and to study how candidates use our services)
To enable you to complete a survey	(a) Identity Data; (b) Contact Data; (c) Profile Data; (d) Usage information including how you use our website and services (Usage Data); and (e) Marketing and Communications Data	(a) Performance of a contract with you, (b) on the basis of your consent (c) Necessary for our legitimate interests (to study how candidates use our services, to develop them and grow our business)
To administer and protect our business (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity Data; (b) Contact Data; and (c) Technical data including IP address, log in data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website ('Technical Data').	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To provide our website services to you	(a) Identity Data;	(a) Performance of a contract with you

	(b) Contact Data; (c) Profile Data, (d) Usage Data, (e) Marketing and Communications Data; (f) Technical Data;	(b) Necessary for our legitimate interest (c) on the basis of a contract with our Clients (who will have established a legal basis) (d) On your instructions, directly or via a PSP (Consent)
To provide our services to our clients	(a) Identity Data; (b) Contact Data; (c) Profile Data, (d) special category	(a) Necessary for our legitimate interest to provide our core services and assist with the loan application (b) On the basis of your consent (c) By reliance on our client establishing a legal basis for processing the data (including special category) and ensuring a contract is in place between us and our clients
To provide our Bank Account Check service	Identity Data Usage Data Contact Data	(a) On the basis of your consent (b) Necessary for our legitimate interest to provide our core services and assist with the loan application

- For Clients, we may collect and process certain personal data about individuals within your organisation as follows:

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you	(a) Identity Data; and (b) Contact Data.	Performance of a contract with you
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey (c) Keep you updated on our services and business.	(a) Identity Data; (b) Contact Data; (d) Marketing and Communications Data.	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how clients use our services)
To enable you to partake in or complete a survey	(a) Identity Data; (b) Contact Data; (c) Profile Data; (d) Usage Data; and	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how clients use our products/services, to develop them and grow our business)

	(e) Marketing and Communications Data	
To administer and protect our business (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity Data; (b) Contact Data; and (c) Technical Data.	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity Data; (b) Contact Data; (c) Profile Data, (d) Usage Data, (e) Marketing and Communications Data; and (f) Technical Data.	Necessary for our legitimate interests (to study how clients use our services, to develop them, to grow our business and to inform our marketing strategy)
To provide our services to you	(a) Identity Data; (b) Contact Data; (c) Profile Data; (d) Usage Data; (e) Marketing and Communications Data; (f) Technical Data; and (g) Transactional Data	(a) Performance of a contract with you (b) Necessary for our legitimate interests (in the operation of business and service performance)
To provide you with relevant information that we think will be of interest to you, such as industry insights, opinion pieces, surveys and event invitations.	(a) Contact Data; and (b) Identity Data.	Necessary for our legitimate interests (to develop our services and grow our business)

- For PSP's, we may use personal data of individuals within your organisation as follows:

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To obtain your services and perform and manage a contract with you.	(a) Contact Data; and (b) Identity Data.	(a) Performance of a contract with you; (b) Necessary in our legitimate interest (in our business interests to receive your services)
To share your details with other PSP's or organisations to whom we provide services.	(a) Contact Data; and (b) Identity Data.	

To register you	(a) Identity Data; and (b) Contact Data.	Performance of a contract with you
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey (c) Keep you updated on our services and business.	(a) Identity Data; (b) Contact Data; (c) Marketing and Communications Data.	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how clients use our services)
To enable you to partake in or complete a survey	(a) Identity Data; (b) Contact Data; (c) Profile Data; (d) Usage Data; and (e) Marketing and Communications Data	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how clients use our products/services, to develop them and grow our business)
To administer and protect our business (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity Data; (b) Contact Data; and (c) Technical Data.	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity Data; (b) Contact Data; (c) Profile Data, (d) Usage Data, (e) Marketing and Communications Data; and (f) Technical Data.	Necessary for our legitimate interests (to study how clients use our services, to develop them, to grow our business and to inform our marketing strategy)
To provide our services to you	(a) Identity Data; (b) Contact Data; (c) Profile Data; (d) Usage Data; (e) Marketing and Communications Data; (f) Technical Data; and (g) Transactional Data	(a) Performance of a contract with you (b) Necessary for our legitimate interests (in the operation of business and service performance)

To provide you with relevant information that we think will be of interest to you, such as industry insights, opinion pieces, surveys and event invitations.	(a) Contact Data; and (b) Identity Data.	Necessary for our legitimate interests (to develop our services and grow our business)
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- For website users, we may use personal data as follows:

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To administer and protect our business (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Technical Data	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Usage Data, (b) Marketing and Communications Data; and (c) Technical Data.	Necessary for our legitimate interests (to study how individuals use our website, to develop it, to grow our business and to inform our marketing strategy)

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile 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 products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or we provide services to you and, in each case, you have not opted out of receiving that marketing.

Third-party marketing

We do not share your data with third parties for marketing purposes.

Opting out

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by [contacting us](#) at any time

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of service provision, product/service experience, website registrations or other transactions.

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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [contact us](#).

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 have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- External Third Parties as set out in the [Glossary](#).
- 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. International transfers

We do not transfer your personal data outside the European Economic Area (**EEA**). In the event we ever intend to transfer data outside the EEA on a one-off basis, we will provide information on this to you directly and obtain your consent before transferring.

However, our employees and officers will also be able to access emails and our IT systems whilst outside the EEA, in the course of their employment. This does mean that your personal data is accessible whilst outside the EU, however, we have assessed the risk and ensured adequate safeguards are in place.

7. 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 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.

8. 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.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

We usually keep basic information about Customers, Clients and PSP's (including Contact, Identity, Financial and Transaction Data) for six years after they cease being one of the preceding. For full information of our retention periods please [contact us](#).

In some circumstances you can ask us to delete your data: see [Request erasure](#) below for further information.

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.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- [Request access to your personal data](#)
- [Request correction of your personal data](#)
- [Request erasure of your personal data](#)
- [Object to processing of your personal data](#)
- [Request restriction of processing your personal data](#)
- [Request transfer of your personal data](#)
- [Right to withdraw consent](#)

If you wish to exercise any of the rights set out above, please [contact us](#)

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 and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

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.

10. Glossary

Lawful Basis

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by [contacting us](#).

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

Third Parties

External Third Parties

- Service providers, including PSPs, acting as processors based in the UK who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom who require reporting of processing activities in certain circumstances.

Your Legal Rights

You have the right to:

Request access

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

The right to request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please [contact us](#)