

Andrew Gordon & Co understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our clients and are committed to protecting your personal data. We will only collect and use your personal data in ways that are described here and in a manner that is consistent with our obligations and your rights under the law.

1. What Does This Notice Cover?

Whenever you give us personal data you are consenting to its collection and use in accordance with this Privacy Notice which explains how Andrew Gordon and Co collects, processes and holds your personal data which you provide to us when you enter into a contract with us for our services, make an enquiry, make a payment, visit our website or otherwise. It also explains your rights under the law relating to your personal data.

2. Controller contact details

Andrew Gordon & Co (referred to as 'we', 'us' or 'our') is the controller and responsible for your personal data. We have appointed a data privacy manager who should be contacted if you have any questions about this privacy notice. Contact details: The Data Privacy Manager, Andrew Gordon & Co, 183 Watling Street West, Towcester, Northamptonshire NN12 6BX info@gordonlaw.co.uk

3. What Is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") and the Data Protection Act 2018 (collectively "the Data Protection Legislation") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'. In simpler terms it is any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers. The personal data that we use is set out in Part 5 below.

4. What Are My Rights?

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- Your right of access = to ask us for copies of your personal information.
- Your right to rectification = to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- Your right to erasure = to ask us to erase your personal information in certain circumstances.
- Your right to restriction of processing = to ask us to restrict the processing of your information in certain circumstances.
- Your right to object to processing = objection to the processing of your personal data in certain circumstances.
- Your right to data portability = to ask that we transfer the information you gave us to another organisation, or to you, in certain circumstances.

If you have cause for complaint regarding our use of your personal data, you have the right to make a complaint with the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. We would, however, appreciate the chance to deal with and resolve your concerns ourselves, so please contact us in the first instance using the details in Part 2.

5. What Personal Data Do You Collect and How?

Depending upon your use of our services, website and/or client portal we may collect and hold some or all of the personal and non-personal data set out below. We do not collect any 'special category' or 'sensitive' personal data or personal data relating to children or data relating to criminal convictions and/or offences.

- Identity information including title, name, date of birth, NI number, photograph
- Contact information including address, email address, telephone numbers
- Financial information including bank account details, source and proof of wealth/funds, mortgage affordability, credit status, assets, equity
- Asset information including property sale address, property sale price, property purchase address, property purchase price, status
- Data from third parties including property sale address, property sale price, property purchase address, property purchase price, mortgage provider
- Technical data including internet protocol (IP) address, login data, browser type and version, time zone setting and location, operating system and platform and other technology on the devices you use to access our website or client portal
- Profile data including your username and password
- Marketing and communications data including your preferences in receiving information from us and/or third parties

We may use different methods to collect data from and about you, but for the most part your personal information is collected via direct interaction, i.e. the information you give to us by telephone, email, post, etc., in order to receive an estimate of costs or to contract our services. We may also receive personal data about you from various third parties and open public data and record sources. Additionally, automated technical data regarding your equipment, browsing actions, location, etc., may be collected by our website.

Our website may contain links to third party websites. Clicking on those links may allow third parties to collect or share data about you. We would therefore encourage you to read the privacy notice of every website you visit.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

6. How Do You Use My Personal Data?

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. The following table describes how we will or may use your personal data, and our lawful bases for doing so:

What We Do	What Data We Use	Our Lawful Basis
Providing you with an estimate and/or advice	Identity Contact Asset Third party	<ul style="list-style-type: none"> o Performance of a contract with you
Supplying our services to you	Identity Contact Financial Asset Third party	<ul style="list-style-type: none"> o Performance of a contract with you o Complying with legal obligations
Managing payments for our services	Identity Contact Financial	<ul style="list-style-type: none"> o Performance of a contract with you o Legitimate interest to recover debts due to us
Communicating with you	Identity Contact Marketing & communications	<ul style="list-style-type: none"> o Performance of a contract with you o Legitimate interest to develop our service
To administer and protect our business, website and/or client portal	Identity Contact Technical Profile Marketing & communications	<ul style="list-style-type: none"> o Performance of a contract with you o Legitimate interest to run our business, provision of IT services, network security, prevent fraud o Complying with legal obligations

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email and/or telephone and/or post with information, news, and offers on our services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out. We will always obtain your express opt-in consent before sharing your personal data with third parties for marketing purposes and you will be able to opt-out at any time.

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 2.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

7. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected and for the purposes of satisfying any legal, accounting or reporting requirements. By law we have to keep basic information (contact, identity, financial) about our customers for 5 years for the Anti Money Laundering Regulations and 6 years for tax purposes. However, our Regulator, the Council for Licensed Conveyancers, requires us to retain a property sale file for 6 years and a property purchase file for 15 years.

8. How and Where Do You Store or Transfer My Personal Data?

We will only store or transfer your personal data within the European Economic Area (the "EEA"). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the Data Protection Legislation, GDPR, and/or to equivalent standards by law.

9. Do You Share My Personal Data?

We may be required to share your personal data with the parties set out below for the purposes described in Part 6:

- Regulators and other authorities
- Service providers of IT and system administration services
- Professional advisers including lawyers, bankers, mortgage lenders, accountants, auditors, insurers, accountants, credit reference agencies, estate agents, financial advisors, search providers, HM Land Registry
- Third parties for the purpose of selling, transferring or merging parts of our business or assets.

For the purposes of meeting our obligations under Anti-Money Laundering Regulations we may share and receive data with Transunion International UK Limited whose own privacy notice can be read by visiting [transunion.co.uk/legal-information/bureau-privacy-notice](https://www.transunion.co.uk/legal-information/bureau-privacy-notice).

We require all third parties to respect the security of your personal data and to treat it in accordance with the law.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

If any of your personal data is shared with a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Part 8.

If any personal data is transferred outside of the EEA, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation, as explained above in Part 8.

10. How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request". All subject access requests should be made in writing and sent to the email or postal address shown in Part 2. We will respond to your subject access request within one month of receiving it. However, in some cases, for example if your request is more complex, more time may be required. You will be kept informed of our progress.

There is not normally any charge for a subject access request. However, if your request is manifestly unfounded, repetitive or excessive a reasonable fee may be charged to cover our administrative costs.

11. Changes to this Privacy Notice

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection. Any changes will be made available via our website or upon request.