



# Privacy Policy

Andrew Gordon & Co understands that your privacy is important and that you care about how your personal data is used. We respect and value the privacy of our clients and are committed to protecting your personal data.

This policy explains when and why we process personal data collected from you or provided to us by a third party; how this data is used; the conditions under which it may be disclosed to others and how it is kept secure. It also provides you with information regarding various rights you may have in respect of the processing of your personal data by Andrew Gordon & Co.

This policy may be updated from time to time in accordance with changing privacy and data protection legislation and regulation. In view of this you may wish to visit this page from time to time. If any amendments have an impact on how we process your personal data the notice will say so.

## WHO WE ARE

Andrew Gordon & Co Licenced Conveyancers is a trading name of Gordon Law Limited (Company Number 07948491) and our registered office is 183 Watling Street West, Towcester, Northamptonshire, NN12 6BX.

Gordon Law Limited is a Controller of personal data registered with the Information Commissioner under registration number ZA507944 and we are regulated by the Council of Licensed Conveyancers (Practice License Number 11111).

In its role as a Controller, Gordon Law Limited determines why and how the personal data it collects is processed.

Where this policy refers to "Andrew Gordon & Co", "we", "our" or "us" below, unless it mentions otherwise, it is referring to the Controller of your personal data, Gordon Law Limited.

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
- ☎ 01327 354456
- 💻 [info@gordonlaw.co.uk](mailto:info@gordonlaw.co.uk)

## HOW WE COLLECT YOUR 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.

You provide us with information about yourself when you make an enquiry with us, engage us to provide legal services, when entering information via our website, or by communicating with us by phone, post, e-mail or otherwise. You may also provide information to us during the course of any legal matter.

We may receive information about you from a third party when we are acting for you and we may be required to obtain information about you, from your Lender for example.

We may supplement the personal data collected from you with information from publicly available sources, such as information to validate your identity or address, or to perform a bankruptcy check.

Please note that we ask you to produce documents to verify your identity in order to comply with legal and statutory obligations. If we are unable to verify your identity we will not be compliant with the Money Laundering Regulations 2017 and could not therefore accept your instructions.

Where we receive information about you, we will only use that information for the purposes of the legal matter and to comply with any regulatory or legal obligations we are subject to.

To make it easier to understand the data we collect about you, we have divided this information into categories in the table below and provided a short explanation of the type of information each category covers (please note that not all categories may be applicable to you):

CATEGORY	PERSONAL DATA INCLUDED IN THIS CATEGORY
Banking/Billing	information used to send/receive funds to/from you or that appears on your statement of account.
Behavioural	your activities, actions and behaviours
Biographical	your life experiences and circumstances
Contact	information which can be used to address, send or otherwise communicate a message to you (i.e. email address, postal address, employer name and job title)
Correspondence	information contained in our correspondence or other communications with you or about you, or about our products, services or business
Employment	your previous, current or future employment details
Financial	information of financial transactions, history, bank account details, source and proof of wealth/funds, mortgage affordability, credit status, assets, equity
Geo-location	information which contains or reveals the location of your electronic device
Identification	information contained in a formal identification document
Insurance	your buildings/indemnity insurance applications, policies and any information relating to any insurance claim
Legal	information from public and other records including Companies House, Land Registry, Government and Local authorities
Monitoring	we may record phone or video calls and meetings and retain transcripts of dialogue for our records or for training purposes.

## HOW AND WHY WE USE YOUR PERSONAL DATA

We may use the information we collect about you in the following ways:-

1. We may use and process your personal data where we have supplied you (or continue to supply you) with any legal services, where we have arranged for the supply of another firm's services to you, or where you are in discussions with us about a particular matter on which you are considering taking advice.

2. We may use and process your personal data where it is necessary for us to pursue our legitimate interests as a business for the following purposes;
  - to carry out our conflict checks to ensure that we are able to provide services to you;
  - to assess and improve our service to clients or our clients' customers (where applicable) through recordings of any calls and video calls;
  - for the prevention of fraud and other criminal activities;
  - to verify the accuracy of the data that we hold about you and to create a better understanding of you as a client;
  - to undertake analysis to inform our business and marketing strategy;
  - for network and information security purposes to enable us to take steps to protect your personal data against loss or damage, theft or unauthorised access;
  - to comply with a request from you in connection with the exercise of your rights (e.g. where you have asked us not to contact you for marketing purposes, we will keep a record of this on our suppression lists in order to be able to comply with your request);
  - to assist in the management of queries, complaints or claims;
  - for the establishment, exercise or defense of our legal rights.
3. Where you engage us to provide legal services to you, we will need to process your personal data and the personal data of third parties in order to comply with our legal obligations, for example under the Council of Licensed Conveyancers or Financial Conduct Authority Handbook.
4. It is also a legal requirement for you to provide us with information to verify your identity in connection with anti-money laundering and criminal financing legislation. We will use that information for the purpose of complying with the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 as amended (or such other legislation that may replace or supersede these Regulations from time to time) unless we have obtained your consent to use it for any other purpose.
5. We may use and process your personal data in order to comply with other legal obligations to which we are subject, as follows:
  - to comply with our other legal and regulatory obligations, e.g. undertaking conflict checks; and
  - for the prevention of fraud and other criminal activities.
6. Our work for you may require us to provide information to third parties who will use your information for the purposes of providing services to us or directly to you on our behalf. Such third parties may include for example insurers, payment processing or software providers. When we use third party service providers, we only disclose to them any personal data that is necessary for them to provide their services.
7. Our work may require us to provide information to third parties such as law firms, mortgage lenders or estate agents.
8. Where we are engaged by a third party such as a bank or lender in connection with your transaction, we may share information you provide to us with that third party. Any third party to whom we disclose information about you will be under an obligation to keep your information secure and not to use it for any purpose other than that for which it was disclosed unless you agree with them otherwise.
9. We may transfer your personal data to a third party:
  - as a result of the sale of part or all of our business and assets or business restructuring or reorganisation;
  - if we are under a duty to disclose or share it in order to comply with:
    - any legal obligation;
    - to detect or report a crime;
    - to protect your vital interests;
    - to enforce or apply the terms of our contracts; or

- o to protect the rights, property or safety of our visitors and clients.

However, we will always take steps to ensure that your privacy rights continue to be protected.

10. 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 request reviews of our service. 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. 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.
11. 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. 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.

## **WHERE WE STORE YOUR PERSONAL DATA**

All information you provide to us for our use is stored on our secure servers which are located within the UK and the European Economic Area (EEA). The third parties who may receive and have access to your personal data may be located outside of the EEA or they may transfer your data outside of the EEA. Those countries may not have the same standards of data protection and privacy laws as in the UK, which means additional safeguards must be put in place. 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.

The transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website and any transmission is at your own risk. Once we have received your personal data, we have in place reasonable and appropriate controls to ensure that it remains secure against accidental or unlawful destruction, loss, alteration, or unauthorised access.

Where we have given you (or where you have chosen) a password which enables you to access any of our online or electronic resources, you are responsible for keeping this password confidential. We advise you not to share your password with anyone.

Our paper files are secured offsite with Restore Records Management for the required periods to comply with our obligations. Their facilities have secure entry systems and CCTV monitoring. Accredited with, or working to ISO and BS Standards including Quality, Environment, Information Security, Business Continuity; GDPR and the Data Protection Act 2018. Restore Records Management also take care of securely shredding and destroying files following completion of the storage period. Restore Date Shred take care of securely removing and destroying our day-to-day confidential paperwork/data.

## **HOW LONG WILL WE STORE YOUR PERSONAL DATA**

If we collect your personal data, the length of time for which we retain it is determined by a number of factors including the type of data, the purpose for which we use that data and our regulatory and legal obligations attached to this use.

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 7 years and a property purchase file for 15 years.

## **OUR WEBSITE**

By using and interacting with our website, we collect and process certain information about you in the following ways:-

1. Information - including your name and job title, contact information including email address, and/or demographic information such as postcode may be voluntarily provided by you, for instance in order for you to:
  - Enquire about a job vacancy advertised on [www.gordonlaw.co.uk](http://www.gordonlaw.co.uk);
  - Receive downloads from our website;
  - Complete an enquiry or contact form or apply for an estimate;

We may also ask you for information when you report a problem with our website.

2. We may also automatically collect information about you which we may observe, detect or create without directly asking you to provide the information to us. In common with most other businesses, this will mainly include information gathered automatically through your use of our website or online services, such as your IP address, telephone number or the pages of our website that you have visited.
3. Like many other websites, our website uses cookies (including Google Analytics cookies to obtain an overall view of visitor habits and visitor volumes to our website). 'Cookies' are small pieces of information sent to your computer and stored on its hard drive to allow our website to recognise you when you visit. It is possible to switch off cookies by setting your browser preferences. This may prevent you from taking full advantage of our website.

## **LINKS TO OTHER WEBSITES**

Our website and documentation may contain links to other websites run by other organisations. This policy does not apply to those other websites, so we encourage you to read their privacy statements.

We are not responsible for the privacy policies and practices of other websites even if you access them using links that we provide, and their security cannot be guaranteed.

If you linked to our website from a third-party website, we cannot be responsible for the privacy policies and practices of the owners and operators of that third-party website and recommend that you check the policy of that third-party website.

## **YOUR RIGHTS**

You have a number of rights in relation to your personal data under data protection legislation.

**ACCESSING YOUR PERSONAL DATA** - You have the right to ask for a copy of the data that we hold about you by emailing or writing to the data privacy manager (contact details set out within this Policy). We may not provide you with a copy of your personal data if it concerns other individuals or we have another lawful reason to withhold that data.

We may charge you a reasonable fee based on administrative costs if you request a copy of data we have previously provided to you or if your request is manifestly unfounded or excessive. In line with our environmental commitments, we will try to provide you with a copy of your data by electronic means where this is possible, unless you have specified otherwise in your request.

**CORRECTING AND UPDATING YOUR PERSONAL DATA** - The accuracy of your data is important to us. If you change

your name or address/email address, or you discover that any of the other data we hold is inaccurate or out of date please contact us.

**WITHDRAWING YOUR CONSENT** - Where we rely on your consent as the legal basis for processing your personal data, as set out under 'how and why we use your personal data', you may withdraw your consent at any time by emailing or writing to the data privacy manager. If you withdraw your consent, our use of your personal data before you withdraw your consent is still lawful.

**OBJECTING TO OUR USE OF YOUR PERSONAL DATA** - Where we rely on our legitimate interests as the legal basis for processing your personal data for any purpose(s), as set out under 'how and why we use your personal data', you may object to our using your personal data for these purposes by emailing or writing to the data privacy manager. If we agree that your objection is justified in accordance with your rights under data protection legislation, we will permanently stop using your data for those purposes. Otherwise, we will provide you with our justification as to why we may need to continue using your data.

**ERASING YOUR PERSONAL DATA OR RESTRICTING ITS PROCESSING** - In certain circumstances, you may ask for your personal data to be removed from our systems by emailing or writing to the Data Privacy Manager. Please note that this right is not an absolute right. Provided we do not have any continuing lawful reason to continue processing or holding your personal data, we will make reasonable efforts to comply with your request. We may only process your personal data whilst its processing is restricted if we have your consent or are legally permitted to do so, for example for storage purposes, to protect the rights of another individual or company or in connection with legal proceedings.

**TRANSFERRING YOUR PERSONAL DATA IN A STRUCTURED DATA FILE** - Where we rely on your consent as the legal basis for processing your personal data or need to process it in connection with your contract, as set out under 'how and why we use your personal data', you may ask us to provide you with a copy of that data in a structured data file. We will provide this to you electronically in a structured, commonly used and machine-readable form, such as a CSV file or similar.

You can ask us to send your personal data directly to another service provider, and we will do so if this is technically possible. We may not provide you with a copy of your personal data if this concerns other individuals or we have another lawful reason to withhold that data.

**IF YOU ARE DISSATISFIED WITH THE USE OF YOUR PERSONAL DATA** - If you wish to complain about the way we use your personal data, you can write or email the data privacy manager. If you are dissatisfied with our response to your complaint and remain concerned about the way we have processed your personal, you have the right to complain to the Information Commissioner's Office (ICO).