

# Linley and Simpson Group Limited Data Protection and Privacy Policy Notice

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal information. It also explains your rights in relation to your personal information and how to contact us or supervisory authorities in the event you have a complaint.

We collect, use and are responsible for certain personal information about you. When we do so we are subject to the General Data Protection Regulation, which applies across the European Union (including in the United Kingdom) and we are responsible as ‘controller’ of that personal information for the purposes of those laws.

This notice provides information on how Linley and Simpson Group Limited (“we”, “our” or “us”) and any of its subsidiaries, branches or representative offices providers collect, use, secure, transfer and share your information.

**Head Office:**  
**Troy Mills, Troy Road, Horsforth, Leeds, LS18 5GN**

We may collect and use the following personal information about you:

1. First Name	13. Howmany Dependants	25. Personal/Secure Loan Details	37. IP Address
2. Middle Name	14. Dependants Name	26. Personal Debt Details	38. Cookies
3. Surname	15. Dependants DOB	27. Personal Expenditure	39. Marital Status
4. Previous Name	16. Primary ID	28. Existing Mortgage Details	40. Salary
5. Date of Birth	17. Address ID	29. Existing Insurance Details	41. Accountant Details
6. Present Address	18. BankStatements	30. Email Address	42. Previousemployers details
7. Residential Status	19. CreditCard Statements	31. Phone Numbers	43. Employers Address
8. Previous Addresses	20. Mortgage Statements	32. New Property Details	44. Employers Phone number
9. Landlord Details	21. Proof of Deposit	33. Solicitor Details	45. Health
10. Nationality	22. Payslips	34. Estate Agent Details	46. Ethnicity
11. NINumber	23. SelfEmployed Accounts	35. New Mortgage Details	47. Credit Card Details
12. UK National	24. Employers Name	36. NewInsurance Details	48. Bank Details

This personal information is required to provide services to you. If you do not provide personal information we ask for, it may delay or prevent us from providing services to you.

## Methods of Collection

In the general conduct of business, we collect information relevant to the services being provided by us from a number of sources:

- yourself
- next of kin
- spouse / partner / family member
- business associates
- employers
- third party sources including:
  - government / land registers, including Companies House or HM Land Registry
  - credit / default agencies
  - financial institutes (banks, building societies, loan agencies, credit card companies)
  - insurance companies
  - through our professional advisors such as accountants or law firms
  - health providers
  - through consent to third parties disclosing information about you to us that they have collected
  - from cookies on our website
- Doubleclick Remarketing pixels are being used for advertising purposes by Newsquest Media Group.

Such information will generally be collected directly via the use of any of our standard forms, over the internet, via email, in our branches or through a telephone conversation with you.

We may also collect personal information through our affiliates or suppliers.

In addition, you may choose to submit information directly to us via several methods, including:

- through websites
- in response to marketing or other communications
- through social media
- by signing up for a product or service
- through participation in an offer, program or promotion
- in connection with an actual or potential business or employment relationship with us

You may also agree to third parties disclosing information about you to us that those third parties have collected.

We, our service providers and partners collect certain information by using automated means, such as cookies and web beacons, when you interact with our advertisements, mobile applications, or visit our websites, pages or other digital assets. The information we collect in this manner may include: IP address, browser type, operating system, referring URLs and information on actions taken or interaction with our digital assets.

## **Purposes of Collection**

Under data protection law, we can only use your personal information if we have a proper reason for doing so, including:

- to comply with our legal and regulatory obligations;
- for the performance of our contract with you or to take steps at your request before entering into a contract;
- for our legitimate interests or those of a third party; or
- where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

Generally, we will collect, use and hold your information for the purposes of:

- Assessing applications for and providing products / services
- Conducting business, developing relationships with us and our affiliates
- Process payments / transactions including: accounting, authorisation, clearing, chargebacks, auditing, billing, reconciliation, collection, complaints, enquiries, credit checks and related dispute resolution activities

- Protect against and prevent fraud, unauthorised transactions, money laundering (please see below), tax evasion, claims, other liabilities and manage risk exposure and agent / franchise quality, integrity, compliance and security of business processes
- Create and manage any accounts, associated authentication criteria (id's and passwords) you may have with us
- Provide, administer and communicate with you about our products, services, offers, programs and promotions, their issuers, acquirers, retailers and partners
- Compile business directories, including business contact information
- Operate, monitor, evaluate and improve our products, services, websites, mobile applications, other digital assets and business
- Developing new products and services
- Managing communications, assess effectiveness and optimisation of advertising
- Functionality of our websites, mobile applications other digital assets
- Evaluate your interest in employment and contact you regarding possible employment
- Staff administration and to ensure safe working practices

## Anti-money Laundering

In addition to helping you with a property related service we have to comply with certain regulations for example the 'Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (referred to as 'the Regulations'). We and other subsidiaries are required to obtain certain information from you to comply with the Regulations.

We will require two separate Identification documents one primary and one secondary document even if it appears on both lists. The information may be required at various stages of the process.

We reserve the right to employ third party electronic verification for the purpose of verifying identity. This search will not affect your credit rating.

## Promotional Communications

We may use your personal information to send you updates (by email, text message, telephone or post) about our services, including offers, promotions or new products or services.

We will always treat your personal information with care and never share it with other organisations for marketing purposes unless otherwise stated in this privacy policy.

You have the right to opt out of receiving promotional communications at any time by:

- contacting us at [privacy@linleyandsimpson.co.uk](mailto:privacy@linleyandsimpson.co.uk)
- using the 'unsubscribe' link in emails
- contacting us at our head office

We may ask you to confirm or update your marketing preferences if you instruct us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our business.

## Information We Share

We do not sell or otherwise disclose personal information we collect about you, except as described in this notice or as indicated via the consent process at the time the data is collected. We share the information we collect with, but not limited to:

- Vetted affiliates and partners / financial institutions / insurance companies for business facilitation to provide required services, such as mortgages, insurance cover etc.
- Formally contracted service providers to perform services on our behalf:
- Helpdesk and Call Centres who help us to carry out our services.

We contractually require these service providers to safeguard the privacy and security of personal information they process on our behalf and authorise them to use or disclose the information only as necessary to perform services on our behalf or comply with legal requirements.

- Credit agencies, Land Registry Office, Her Majesty's Revenue and Customs (HMRC), Financial Conduct Authority (FCA) and other relevant regulatory bodies
- Additionally we may share information about you, if required legally, to prevent harm or financial / reputation loss, for investigation of suspected or actual fraudulent or illegal activities

- Perspective employers requesting references via your written consent

We reserve the right to transfer your information in the event of a sale or transfer (wholly or partially) of our business or assets.

## **Where your personal information is held**

Information may be held at our offices and those of our group companies, third party agencies, service providers, representatives and agents as described above (see above: 'Information we Share').

Some of these third parties may be based outside the European Economic Area. For more information, including on how we safeguard your personal information when this occurs, see below: 'Transferring your personal information out of the EEA'.

## **How long do we keep information for?**

We will keep information for a reasonable amount of time in order to perform the purposes listed above.

We only keep your information for as long as necessary. We generally keep personal information for 7 years after last contact with you in order to keep records required by law or to respond to any questions from you after we have completed our services.

## **Transferring your information out of the EEA**

To deliver services to you, it is sometimes necessary for us to share your personal information outside the European Economic Area (EEA), for example:

- with your and our service providers located outside the EEA;
- if you are based outside the EEA;

These transfers are subject to special rules under European and UK data protection law.

These non-EEA countries do not have the same data protection laws as the United Kingdom and EEA. We will, however, ensure the transfer complies with data protection law and all personal information will be secure. Our standard practice is to use standard data protection contract clauses that have been approved by the European Commission.

If you would like further information please contact our Data Protection Officer (see 'How to Contact Us' below).

## **Your Rights and Choices**

Your rights regarding the sensitive / personal information we maintain about you enable you to exercise choices about what personal information we collect from you, how we use that information, and how we communicate with you.

These rights are:

## **Access**

You have the right to:

- obtain confirmation that we hold personal information about you
- request access to and receive information about the personal information we maintain about you
- receive copies of the personal information we maintain about you
- object to how we use your data

The right to access personal information may be limited in some circumstances by local law requirements.

To exercise these rights, please see the details in 'How to Contact Us' below.

## **Update and correct inaccuracies in your personal information**

If you feel that the information we hold about you is incorrect or inaccurate you can contact us outlining the information you feel is incorrect or inaccurate.

If we refuse to correct your personal information, we will provide you with a written notice that sets out the reasons for our refusal (unless it would be unreasonable to provide those reasons) and provide you with a statement regarding the mechanisms available to you to make a complaint. We will provide you with access to information we hold about you.

## **Data Portability and the right to be forgotten**

You have the right to receive this information you provided us in a structured, commonly used and machine readable format and/or transmit that data to a third party in certain situations. You also have the right to require us to delete your personal information in certain situations.



## How to Contact Us / Complaints and Feedback

- if you wish to make a complaint about a breach of your personal information, applicable privacy laws / principles
- or would like access and / or update information or preferences you provided

You may e-mail us at:

[privacy@linleyandsimpson.co.uk](mailto:privacy@linleyandsimpson.co.uk)

Or write to us at:

**Group Data Protection Officer, Linley and Simpson Group Ltd, Troy Mills, Troy Road, Horsforth, Leeds, LS18 5GN**

To assist us in responding to your request, please give full details of the issue. We attempt to review and respond to all complaints within a reasonable time.

If we cannot for lawful reasons complete your request we will explain this to you to the extent that we lawfully can.

The General Data Protection Regulation (GDPR) also gives you the right to lodge a complaint with a supervisory authority. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns> or telephone 0303 123 1113.

## How We Protect Personal Information

The security of your personal information is very important and Linley and Simpson is committed to protecting the information we collect. We maintain administrative, technical and physical safeguards designed to protect the personal information you provide or we collect against accidental, unlawful or unauthorised destruction, loss, alteration, access, disclosure or use.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

## Changes to this Privacy Policy

We may change this privacy notice from time to time. When we do, we will update the version date on our website.