



Privacy Policy

The aim of this Privacy Policy is to explain what information we collect about you, what we do with that Data and how we manage it. We strive to ensure compliance with the General Data Protection Regulations (GDPR) and refer you to our Data Protection and Data Security Policy. This provides information about us being a controller of your Data.

Definitions and interpretation

1. In this privacy policy, the following definitions are used:

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| Data | collectively all information that you submit to Threemo Legal Services Limited. This definition incorporates, where applicable, the definitions provided in the Data Protection Laws; |
| Cookies | a small text file placed on your computer by this Website when you visit certain parts of the Website and/or when you use certain features of the Website. Details of the cookies used by this Website are set out in the clause below (Cookies); |
| Data Protection Laws | any applicable law relating to the processing of personal Data, including but not limited to the Directive 96/46/EC (Data Protection Directive) or the GDPR, and any national implementing laws, regulations and secondary legislation, for as long as the GDPR is effective in the UK; |
| GDPR | the General Data Protection Regulation (EU) 2016/679; |
| Threemo, or us | Threemo Legal Services Limited (Registered in England) trading as Threemo is a legal services firm regulated by the Council for Licensed Conveyancers (CLC) with Practice Licence Number 11646 and our registered office is 3 The Office Campus, Red Hall Court, Wakefield, WF1 2UY and our Company Registration Number is 11396027. Data protection register number ZA461812; |
| UK and EU Cookie Law | the Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended by the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011; |



User or you

any third party that accesses the Website, the Hub and our systems and is not either (i) employed by Threemo Legal Services Limited and acting in the course of their employment or (ii) engaged as a consultant or otherwise providing services to Threemo Legal Services Limited and accessing the Website in connection with the provision of such services; and

Website

the website that you are currently using, www.threemo.co.uk and any sub-domains of this site unless expressly excluded by their own terms and conditions.

What information do we collect about you?

We will not collect or use personal Data unless it is lawful for us to do so. We collect and process:

- your name;
- your address;
- your date of birth;
- your e-mail address;
- your telephone number;
- your NI number;
- ID documentation;
- your property title information including any secured existing lender information and proposed lender information;
- financial information such as your bank provider, account number and sort code;
- mortgage information;
- tenancy information where applicable;
- insurance information where applicable;

How do we collect Data?

We collect Data in the following ways:

- Data is given to us by you;
- Data is received from other sources; and
- Data is collected automatically.

Data that is given to us by you

Threemo will collect your Data in a number of ways, for example:



- when you contact us through the Website, by telephone, hub, post, e-mail or through any other means;
- when you register with us and set up an account to receive our products/services;
- when you use our services;

in each case, in accordance with this privacy policy.

Data that is received from third parties

We will receive Data about you from the following third parties:

- Referrer;
- Government organisations such as the Land Registry;
- Estate Agent;
- Identification Verification Provider;
- Mortgage Broker.

Data that is collected automatically

To the extent that you access the Website, we will collect your Data automatically, for example:

- we automatically collect some information about your visit to the Website. This information helps us to make improvements to Website content and navigation, and includes your IP address, the date, times and frequency with which you access the Website and the way you use and interact with its content.
- we will collect your Data automatically via cookies, in line with the cookie settings on your browser. For more information about cookies, and how we use them on the Website, see the section below, headed "Cookies".

How do we use this information?

We use this information to fulfil our contractual obligation to you to carry out the legal work on your behalf and provide you with the best possible service. We do not sell, share or transfer personal information except as set out in this Privacy policy.

We use Data processors who are third parties to provide some services to us, such as our case management provider. Such processors are subject to contracts with us and may not use your Data without our consent and instruction. They will not share your personal information with any organisation apart from us. They must store this Data securely and retain it as instructed by us. We also use a cloud provider for the storage of Data and they are subject to contracts with us and may not use your Data without our consent and instruction. They will not share your personal information with any organisation apart from us. They must store this Data securely and retain it as instructed by us.

Personal Data may have to be disclosed to our Regulator the CLC, the Police, the NCA, the Legal Ombudsman, enforcement or government agencies or others with a legitimate interest who may keep a record of that



information. We only share information where it is lawful for us to do so or because the law permits or requires us to. We aim to advise if we have to disclose personal Data but we may not be allowed to by law.

Who do we share Data with?

We may share your Data with the following groups of people for the following reasons:

- our employees, agents and/or professional advisors - to fulfil our contractual obligation;
- third party service providers who provide services to us which require the processing of personal Data and to ensure Data is kept securely;
- relevant authorities - to comply with our legal obligations.

in each case, in accordance with this privacy policy.

How long do we retain the information?

Legally, we must retain your personal Data for at least six years following the end of your transaction, for purchase and remortgage transactions, this will be retained for sixteen years,

How do we keep your information secure?

We strive to ensure your personal Data is kept confidential. We take all reasonable steps to keep it secure, use it fairly and ensure that Data protection safeguards are in place. We will use technical and organisational measures to safeguard your Data, for example:

- access to your account is controlled by a password and a user name that is unique to you.
- we store your Data on secure servers.
- payment details are encrypted using SSL technology (typically you will see a lock icon or green address bar (or both) in your browser when we use this technology.

The payment gateways we use are certified to PCI DSS. This family of standards helps us manage your Data and keep it secure.

Technical and organisational measures include measures to deal with any suspected Data breach. If you suspect any misuse or loss or unauthorised access to your Data, please let us know immediately by contacting us via this e-mail address: info@threemo.co.uk.

Your right to access to your information and correction

GDPR gives you the following rights in relation to your Data:

- **Right to access** – also known as a Subject Access Request. This is the right to request (i) copies of the information we hold about you at any time, or (ii) that we modify, update or delete such information. If we provide you with access to the information we hold about you, we will not usually charge you for this, unless your request is "manifestly unfounded or excessive." Where we are legally permitted to do so, we may refuse your request. If we refuse your request, we will tell you the reasons why.
- **Right to correct** - the right to have your Data rectified if it is inaccurate or incomplete.



- **Right to erase** - the right to request that we delete or remove your Data from our systems. Where we are legally permitted to do so, we may refuse your request.
- **Right to restrict our use of your Data** - the right to "block" us from using your Data or limit the way in which we can use it. Where we are legally permitted to do so, we may refuse your request.
- **Right to data portability** - the right to request that we move, copy or transfer your Data.

To make enquiries or to exercise any of your rights set out above please contact us via info@threemo.co.uk.

Links to other websites

Our Website may, from time to time, provide links to other websites. We have no control over such websites and are not responsible for the content of these websites. This privacy policy does not extend to your use of such websites. You are advised to read the privacy policy or statement of other websites prior to using them.

Your right to complain

You may contact us at info@threemo.co.uk if you are unhappy with our handling of your personal Data. Further, if you are unhappy with our response to your complaint, you may contact the Information Commissioner's Office. The ICO's contact details can be found on their website at <https://ico.org.uk/>.

Cookies

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of the website and to compile statistical reports on website activity.

For further information visit www.aboutcookies.org or www.allaboutcookies.org. You can see what cookies we use below.

You can set your browser not to accept cookies and the above websites tell you how to remove cookies from your browser. However, in a few cases some of our website features may not function as a result.

Our Website may place and access certain Cookies on your computer. Threemo Legal Services Limited uses Cookies to improve your experience of using the Website and to improve our range of services. Threemo Legal Services Limited has carefully chosen these Cookies and has taken steps to ensure that your privacy is protected and respected at all times.

All Cookies used by this Website are used in accordance with current UK and EU Cookie Law.

Before our Website places Cookies on your computer, you will be presented with a message bar requesting your consent to set those Cookies. By giving your consent to the placing of Cookies, you are enabling Threemo Legal Services Limited to provide a better experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of the Website may not function fully or as intended.

This Website may place the following Cookies:

| Type of Cookie | Purpose |
|--------------------------------|-----------------------------------------------------------------------------------------------------|
| Analytical/performance cookies | They allow us to recognise and count the number of visitors and to see how visitors move around our |



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| | website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily. |
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You can choose to enable or disable Cookies in your internet browser. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser.

You can choose to delete Cookies at any time; however you may lose any information that enables you to access the Website more quickly and efficiently including, but not limited to, personalisation settings.

It is recommended that you ensure that your internet browser is up-to-date and that you consult the help and guidance provided by the developer of your internet browser if you are unsure about adjusting your privacy settings.

General

You may not transfer any of your rights under this privacy policy to any other person. We may transfer our rights under this privacy policy where we reasonably believe your rights will not be affected.

If any court or competent authority finds that any provision of this privacy policy (or part of any provision) is invalid, illegal or unenforceable, that provision or part-provision will, to the extent required, be deemed to be deleted, and the validity and enforceability of the other provisions of this privacy policy will not be affected.

Changes to this privacy policy

Threemo reserves the right to change this privacy policy as we may deem necessary from time to time or as may be required by law. Any changes will be immediately posted on the Website and you are deemed to have accepted the terms of the privacy policy on your first use of the Website following the alterations.

This policy was created in January 2019, reviewed in January 2020 and will be reviewed in January 2021.

How to contact us

If you have any questions about our privacy policy or the information we hold about you, you can contact our Data Protection Officer via email at info@threemo.co.uk