

This notice explains when and why we collect personal information about you; how we use it, the conditions under which we may disclose it to others and how we keep it secure.

This notice does not apply to any websites that may have a link to ours.

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- Who we are

Data is collected, processed and stored by Vault inc Ltd and we are what is known as the 'data controller' of the personal information you provide to us.

Our Data Protection Officer is Martin Cudmore who can be contacted by email at [mac@vaultinc.co.uk](mailto:mac@vaultinc.co.uk)

## What we need

There are two types of personal data (personal information) that you may provide to us:

- Personal data is the general information that you supply about yourself including your name, address, gender, date of birth, contact details, financial information etc.
- Sensitive personal data which may include your racial or ethnic origin, religion, sexual orientation, political opinions, health data, trade union membership, philosophical views, biometric and genetic data.

In the majority of cases personal data will be restricted to basic information and information needed to complete ID checks.

## Sources of information

Information about you may be obtained from a number of sources; including:

- Information volunteered by yourself
- Information provided relating to someone else (with authority to do so)
- Information passed to us by third parties in order that we can undertake your legal work on your behalf such as banks or building societies, panel providers who allocate legal work to law firms and organisations that have referred work to us

## Why we need it

The primary reason for asking you to provide us with your personal data, is to allow us to carry out your requests – which will ordinarily be to represent you and to approve your legal title.

The following are some examples, although not exhaustive, of what we may use your information for:

- Verifying your identity
- Communicating with you
- Obtaining insurance policies on your behalf
- Seeking advice from third parties; such as legal and non-legal experts

## Who has access to it

We have a data protection regime in place to oversee the effective and secure processing of your personal data. We will not sell or rent your information to third parties. We will not share your information with third parties for marketing purposes.

Generally, the information shared within Vault is either public record certificates or guarantees provided by you. The very nature of the business is to have the ability to store and share these documents

Personal data will only be shared in limited instances. For example

- HM Land Registry to amend or correct the title
- Contracted Suppliers
- Providers of identity verification
- Any disclosure required by law or regulation; such as the prevention of financial crime and terrorism
- If there is an emergency and we think you or others are at risk

In the event any of your information is shared with the aforementioned third parties, we ensure that they comply, strictly and confidentially, with

our instructions and they do not use your personal information for their own purposes unless you have explicitly consented to them doing so.

There may be some uses of personal data that may require your specific consent. If this is the case we will contact you separately to ask for your consent which you are free to withdraw at any time.

## How do we protect your personal data

We recognise that your information is valuable and we take all reasonable measures to protect it whilst it is in our care.

We have exceptional standards of technology and operational security in order to protect personally identifiable data from loss, misuse, alteration or destruction.

Similarly, we adopt a high threshold when it comes to confidentiality obligations and both internal and external parties have agreed to protect confidentiality of all information; to ensure all personal data is handled and processed in line with our stringent confidentiality and data protection policies.

We use computer safeguards such as firewalls and data encryption and annual penetration testing; and we enforce, where possible, physical access controls to our buildings and files to keep data safe.

## How long will we keep it for

Your personal information will be retained, usually in computer or manual files, only for as long as necessary to fulfill the purposes for which the information was collected; or as required by law; or as long as is set out in any relevant contract you may hold with us. For example:

- As long as necessary to carry for you sale to be completed
- By agreement in your log book, which you control.

## What are your rights?

Under GDPR, you are entitled to access your personal data (otherwise known as a 'right to access'). If you wish to make a request, please do so in writing addressed to our Data Protection Officer Martin Cudmore; or contact the person dealing with your matter.

A request for access to your personal data means you are entitled to a copy of the data we hold on you – such as your name, address, contact details, date of birth, information regarding your health etc.- but it does not mean you are entitled to the documents that contain this data.

Under certain circumstances, in addition to the entitlement to ‘access your data’, you have the following rights:

- The right to be informed
- This is fulfilled by way of this privacy notice and our transparent explanation as to how we use your personal data
- The right to rectification
- You are entitled to have personal data rectified if it is inaccurate or incomplete
- The right to erasure/right to be forgotten

You have the right to request the deletion or removal of your personal data where there is no compelling reason for its continued processing. This right only applies in the following specific circumstances:

- Where the personal data is no longer necessary in regards to the purpose for which it was originally collected
- Where consent is relied upon as the lawful basis for holding your data and you withdraw your consent
- Where you object to the processing and there is no overriding legitimate interest for continuing the processing
- The personal data was unlawfully processed
- Where you object to the processing for direct marketing purposes

## The right to object

You have the right to object to processing based on legitimate interests; and direct marketing. This right only applies in the following circumstances:

- An objection to stop processing personal data for direct marketing purposes is absolute – there are no exemptions or grounds to refuse – we must stop processing in this context
- You must have an objection on grounds relating to your particular situation
- We must stop processing your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms; or the processing is for the establishment, exercise or defence of legal claims.

The right to restrict processing

You have the right to request the restriction or suppression of your data. When processing is restricted, we can store the data but not use it. This right only applies in the following circumstances:

- Where you contest the accuracy of the personal data – we should restrict the processing until we have verified the accuracy of that data
- Where you object to the processing (where it was necessary for the performance of a public interest or purpose of legitimate interests), and we are considering whether our organisation's legitimate grounds override your right
- Where processing is unlawful and you request restriction
- If we no longer need the personal data but you require the data to establish, exercise or defend a legal claim

## Complaints about the use of personal data

If you wish to raise a complaint on how we have handled your personal data, you can contact our Data Protection Officer who will investigate further.

Our Data Protection Officer is Martin Cudmore and you can contact them at [mac@vaultinc.co.uk](mailto:mac@vaultinc.co.uk)

If you are not satisfied with our response or believe we are not processing your personal data in accordance with the law, you can complain to the Information Commissioner's Office (ICO).

## Marketing data

We may contact you for the purpose of direct marketing. This means that we may use your personal data that we have collected in accordance with this privacy policy to contact you about our products or services, events etc. which we feel may interest you. The direct marketing communications may be provided to you by social media channels, email or post. We will never send marketing communications via SMS or call you without your specific consent; nor do we ever pass on or sell your details to a third party.

## How we collect personal data

The following are examples, although not exhaustive, of how we collect your personal information:

- Submitting an online enquiry
- Following/liking/subscribing to our social media channels
- Take part in one of the competitions or promotions we run on the website or on our social media channels
- Agree to fill in a questionnaire or survey on our website
- Ask us a question or submit any queries or concerns you have via email or on social media channels
- Post information to our website or social media channels, for example when we offer the option for you to comment on, or join, discussions
- When you leave a review about us on Trustpilot.com or Google Reviews

Whenever we collect your personal data, you will be provided the opportunity to 'opt in' to receiving marketing communications from us. We hope you will provide this information so you find our communications useful but if you choose not to this will have no effect on accessing our legal services.

Vault inc handles enquires at different stages and we group those enquiries into 2 main ways. We will take the following steps in each instance:

- Prospects: Consent will need to be recorded before being added to marketing campaigns.
- Fixed fee clients: Legitimate interest will be the legal basis. Relevant marketing communication by email will be sent during the case and once the case has been closed. Clients have the option to exclude themselves from marketing when speaking to an advisor or contacting Vault inc through email or on social media.

## How we may use your details

The following are examples, although not exhaustive, of how we may use your personal information for our legitimate business interests:

- fraud prevention
- direct marketing
- network and information systems security
- data/analytics /enhancing, modifying or improving our services
- identifying usage trends
- determining the effectiveness of promotional campaigns and advertising.

We may use your personal information for legitimate interests such as direct marketing or under reasonable expectation to provide you with information you would expect to receive or that would benefit and enhance

our relationship. This information will help us review and improve our products, services and offers.

## Your rights

You have the right to object to this processing. Should you wish to do so please email [mac@vaultinc.co.uk](mailto:mac@vaultinc.co.uk)

## How we protect your personal information

We will only ever use non sensitive personal information to target individuals with marketing materials; such as name, address, telephone, email, job description and previous buying behaviours. Sensitive information or specific details will never be used to target marketing communications. We may use personalisation to collect analytics to inform marketing and produce relevant content for the marketing strategy to enable it to enhance and personalise the “consumer experience”.

If you do not wish us to continue to contact you in this way, you can either follow the unsubscribe instructions on any of our communications to you or contact us by emailing [mac@vaultinc.co.uk](mailto:mac@vaultinc.co.uk) with your name and email address. Your details will be removed immediately.

Any questions regarding this notice and our privacy practices should be sent by email to [mac@vaultinc.co.uk](mailto:mac@vaultinc.co.uk)