

Simplify – Data Privacy Notice

Introduction and General Terms

Simplify is made up of a number of Legal Entities. This website is operated on behalf of Simplify by My Home Move Limited, a registered company in England and Wales under company number 03874320 and with our registered office at 1 Frances Way, Grove Park, Enderby, Leicester, LE19 1SH (“Simplify”, “we”, “us” or “our” in this policy).

Simplify is committed to complying with the UK’s Data Protection law and the EU General Data Protection Regulations (GDPR) for the protection of personal data, as well as the principles of data security in the configuration of our service. Where we decide the purpose and means for which personal data you supply through this website is processed, My Home Move Limited is the “data controller.”

If you have any questions or comments about this privacy policy or how we use your personal data, please contact our Data Protection Officer:

The Data Protection Officer
My Home Move Limited
1 Frances Way
Grove Park
Enderby
Leicester
LE19 1SH
Email: DataProtection@myhomemove.com

This privacy policy relates to our use of any personal information you provide to us through this website and any other electronic communications networks such as emails, social media, web chat etc.

The types of personal data we collect and use

Customers

Whether or not you become a customer of Simplify, we may use your personal data for the reasons set out below. If you become a customer of Simplify we will use it to either provide the conveyancing services to you or to fulfil our contract with you. Simplify will collect most of the data indirectly but information collected both directly and indirectly are mentioned in this statement.

- Full name and personal details including contact information (e.g., work and home address and address history, email addresses, telephone numbers, job title and company details and comments);

Job applications

When you submit a job application through our website, the application forms we ask you to complete includes personal data about you. We only process this for the purpose of your application. If you do not provide all relevant information, we may not be able to process your job application.

If you are successful, we will retain the information in accordance with your employment contract and our internal data protection policies, which will be notified to you in the course of the application process.

Simplify will collect most of the data directly from you. Sources of personal data collected indirectly are also mentioned in this statement. The personal data collected may include:

- Full name and personal details including contact information (e.g., work and home address and address history, email addresses, telephone numbers, Date of Birth, National Insurance Number);
- Records of the role you have obtained or applied for.
- Criminal Record Checks
- Information from fraud prevention agencies, credit reference agencies, electoral roll, court records of debt judgements and bankruptcies and other publically available sources;
- Family, lifestyle or social circumstances if relevant to the role you are applying for;
- Previous Employment History/employment status;

You must provide your personal data to enable Simplify to process your application. We will tell you if providing some personal data is optional, including asking for your consent to process it.

Monitoring of communications

Subject to applicable laws, we may monitor and record your calls, emails, text messages, social media messages and other communications in relation to your dealings with us. Simplify will do this for self-regulatory practices, crime prevention and detection, to protect the security of our communication systems and procedures, to check for obscene or profane content, for quality control and staff training.

Using your personal data: the legal basis and purposes

Simplify processes your personal data for the following reasons:

1. As necessary to perform its contract with you for the relevant conveyancing service or employment contract:
 - a) To take steps at your request prior to entering into it;
 - b) To allow you to decide whether to enter into it;
 - c) To manage and perform that contract;
 - d) To update your records; and
2. As necessary for Simplify' s own legitimate interests or those of other persons and organisations, for example:

- a) For good governance, accounting and managing and auditing of our business operations;
 - b) To monitor emails, calls, other communications, and activities on your conveyancing file.
 - c) For market research, analysis and developing statistics;
 - d) To send you marketing communications;
 - e) To monitor the progress of your Conveyancing service; and
 - f) To enable satisfaction surveys to be conducted.
3. As necessary to comply with a legal obligation, for example:
- a) When you exercise your rights under data protection law and make requests;
 - b) For compliance with legal and regulatory requirements and related disclosures;
 - c) For establishment and defence of legal claims;
 - d) For activities in relation to the prevention, detection, and investigation of crime;
 - e) To verify your identity, make fraud prevention and anti-money laundering checks; and
 - f) To monitor emails, calls, other communications, and activities.
4. Based on your consent, for example:
- a) When you request Simplify to disclose your personal data to other people or organisations, such as a company handling a claim on your behalf, or otherwise agree to disclosures;
 - b) When Simplify process any special categories of personal data about you at your request (e.g., your racial or ethnic origin, political opinion, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning your health, sex life or sexual orientation); and
 - c) To send you marketing communications where we have asked for your consent to do so.

Please note that you are free at any time to change your mind and withdraw your consent. The consequence might be that we cannot do certain things for you.

Sharing of your personal data

Subject to applicable data protection laws we may share your data with:

- The Simplify group of companies which means our subsidiaries, our ultimate holding company and its subsidiaries.
- Sub-contractors and other persons who help us provide conveyancing services;
- Companies and other persons providing services to us;
- Our legal and other professional advisors, including our auditors and insurers;
- Fraud prevention agencies, reference agencies when you apply for a role and periodically during your employment (if applicable);
- Government bodies and agencies in the UK and overseas (e.g., HMRC who may in turn share it with relevant overseas tax authorities), the Land Registry, and with our regulators (e.g., Information Commissioner's Office);
- Our employee benefit providers e.g., our pension provider and private medical provider;
- Courts, to comply with legal requirements, and for the administration of justice;
- In an emergency or to otherwise protect vital interests;
- To third parties in order to protect the security or integrity of our business operations;

- To third parties when we restructure or sell our business or its assets or re-organise or merge;
- Market research organisations who help to improve our services;
- To our payroll provider and to banks who may transfer your personal data to others as necessary for regulatory purposes, to process transactions, to resolve disputes and for statistical purposes, including sending your personal data overseas; and,
- Anyone else where we have your consent or as required by law.

How you use our website (analytics)

You can visit our website without giving away your personal information. Simplify uses Google Analytics and Cookies in order to improve our service, user experience and analyse how the website is used. Aside from the approximate location (IP address), the information collected by Google Analytics is mostly anonymous traffic data including browser information, device information, language.

We do not collect additional information, such as your age, gender, interests, bank details or clickstream.

The collected information is used to provide an overview of how people are accessing and using the Simplify Website. It is not used for any additional purpose, such as to profile those who access our website.

International transfers

Your personal data may be transferred outside of the UK and the European Economic Area (EEA). While some countries have adequate protection for personal data under applicable laws, in other countries steps will be necessary to ensure appropriate safeguards apply to it. These include imposing contractual obligations of adequacy or requiring the recipient to subscribe or be certified with an 'international framework' of protection. Where we transfer your personal data outside of the UK and EEA appropriate safeguards will be put in place to protect that data. Further details can be obtained by emailing DataProtection@myhomemove.com.

What if I am aged 18 or under?

If you are aged 18 or under, please get your parent/guardian's prior permission whenever you provide personal information through the Simplify website. Users without this consent are not allowed to provide us with personal information. Please note that individuals under 18 are unable to purchase a property in the United Kingdom.

Direct Marketing Communications

If you have chosen to opt-in to our direct marketing communications, we will use your information to tell you about products and services available from us which may be of interest to you. We may also use your information to tell you about products and services we can introduce from selected businesses.

You have a right to opt-out of our direct marketing communications at any time. You can opt out by following the Unsubscribe instructions at the bottom of the communication or by emailing GroupMarketing@simplify.co.uk.

Links to websites of other providers third parties

Please note that this data privacy policy only applies to Simplify and we are not responsible for, and have no control over, information that is submitted to or collected by third parties, such as those where our websites may provide links and banner advertisements to third party sites. Since we do not control those websites, you are responsible for reviewing and abiding by the privacy policies of these third-party sites to ensure they comply with the applicable data protection regulations.

We accept no responsibility or liability for the contents of any website to which a link exists and give no representation or warranty as to the information on such websites. We accept not responsibility or liability for any loss arising from any contract entered into with any website to which a link exists.

Survey and Competitions

We will treat any survey or competition information you provide with the same high standard of care as we do all personal data, using any details provided strictly within the terms of the competition and this Privacy Statement.

Cookies

Please refer to our cookie policy for information about cookies, what they are used for and your rights to object to them.

How long will the data be stored for?

Where possible, Simplify will take steps to erase any personal data that is no longer necessary for the purposes for which it is collected or otherwise processed, or if you have withdrawn consent for it's processing and retention.

The following criteria are used to determine data retention periods for your personal data:

- **Retention in accordance with legal and regulatory requirements:** Simplify will retain your personal data based our legal and regulatory requirements.
- **Retention in case of claims:** Simplify will retain your personal data for as long as you may bring a legal claim.
- **Retention in case of queries:** Simplify will retain your personal data for as long as they are legally able to do so to enable us to deal with any queries you may have.

Protecting your privacy

In order to protect the personal data collected from you by Simplify against accidental or deliberate manipulation, loss, destruction or the access of unauthorised persons, technical and organisational

security measures are constantly improved as part of our technological development. In addition, our employees, subcontractors and other support staff are obligated to observe confidentiality and data privacy.

Any access to your data that is stored at our company only takes place through an encrypted connection. By using the most up-to-date firewall systems, we provide the best possible protection for your data. Our website, as well as our internal case management systems, and our external case management portals (Client eWay and Introducer eWay) are encrypted using an SSL/TLS (Secure Sockets Layer/Transport Layer Security) connection. SSL is an industry standard and is used by millions of websites in the protection of their online transactions with their customers.

Wherever possible, we have tried to create a secure and reliable website for our users. However, you recognise that your use of the Internet and our website is entirely at your own risk and we have no responsibility or liability for the security of personal information transmitted via the Internet. All passwords and usernames allocated to you must be kept secret and must not be disclosed to anyone without our prior written authorisation. You must not use any false identity or email, or other network communications and you must not attempt or participate in the unauthorised entry or viewing of another user's account or into another system.

You must not use the services and/or network systems or any part thereof for fraudulent activities, or to breach another organisation's security (cross-network hacking). You must not use any computer, computer equipment, network resources or any services provided by us for any illegal purpose, or for accessing, receiving or transmitting any material deemed illegal, indecent, offensive or otherwise unacceptable under UK Law.

We will monitor network traffic from time to time for the purposes of backup and problem solving and in order to ensure that you are not misusing any of the services provided to you.

Breaches

If at any time we become aware that your data has been compromised, or that a breach of our systems and controls has occurred, which has an impact on the security of your data, we will notify the Information Commissioner's Office, and you, without delay.

Your rights under applicable data protection law

Your rights are as follows (please note that these rights do not always apply in all circumstances):

- The right to be informed about how we are processing your personal data;
- The right to have your personal data corrected if it is inaccurate and to have incomplete personal data completed;
- The right to object to processing of your personal data;
- The right to restrict processing of your personal data;
- The right to have your personal data erased;
- The right to request access to your personal data and information about how we process it;
- The right to move, copy, transfer your personal data ("data portability"); and
- Rights in relation to automated decision-making including profiling.

If you would like to exercise any of the above rights, please contact our Data Protection officer in writing:

Data Protection Officer
My Home Move Limited
1 Frances Way,
Grove Park,
Leicester
LE19 1SH
DataProtection@MyHomeMove.com

Right to Complain

You have the right to complain about Data Protection to My Home Move's supervisory authority the Information Commissioner's Office (ICO). It has enforcement powers and can investigate compliance with data protection laws. You can contact the ICO on 0303 123 1113 or by visiting their website: <https://ico.org.uk>.

Changes to the Privacy Policy

This policy will be reviewed, and may change, from time to time as a result of further development of our website, changes to legislation or the implementation of new technologies. Simplify reserves the right to change this data protection information at any time with effect for the future. The revised policy will be posted to this page so that you are always aware of the information we collect, how we use it and under what circumstances we disclose it. We therefore recommend you read the current data protection information again from time to time.

Last updated: February 2022