Simplify Privacy Notice

Introduction

Simplify Moving Limited is a registered company in England and Wales under company number 09117397 and with our registered office at Grant Hall, Parson Green, St Ives, Cambridgeshire, PE27 4AA ("we", "us" or "our" in this policy).

Simplify Moving Limited is part of Simplify. Simplify is made up of a number of legal entitles which includes conveyancing firms, an independent conveyancing panel manager, a property services business and an online conveyancing service.

Whenever dealing with one of the companies, the "controller" of your personal data will be the Company that decides why and how your personal data is processed.

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
Simplify Moving Limited
1 Frances Way
Grove Park
Enderby
Leicester
LE19 1SH
Email: DataProtection1@simplify.co.uk.

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);
- Customer communications (such as emails and web-chat content);
- Case data you or your representatives provide;

- Inferred data generated by our models (e.g. risk scores).

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 (*see below), credit reference agencies, electoral roll, court records of debt judgements and bankruptcies and other publicly 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.

   g)To use artificial intelligence, machine learning and trained reviewers to process information to improve our services to you, to troubleshoot and train our staff. These tools are used on data collected directly and indirectly over electronic communication, call recording and post.
   h) To use automated decision-making to support our services that we provide to you. Where an automated decision has a significant or legal impact on you, we will have sufficient safeguards in place, such as ensuing the decision is subject to meaningful human oversight.
   i) To develop and operate AI systems to improve communication speed and consistency; and support fraud-prevention and quality-assurance objectives.

3. As necessary for Simplify's recognised legitimate intertest, which allows the following security related activities to be considered a legitimate interest by default.

a) Fraud prevention;
b) Public safety; and
c) National security.

4. 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.

5. 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.

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;
- Payment systems 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;
- Cyber and Data Security service providers; and
- Anyone else where we have your consent or as required by law.

How we use AI and automation

We employ machine-learning and other artificial-intelligence techniques hosted securely within our cloud infrastructure (primarily Microsoft Azure) to:

- classify and route customer communications;
- predict case timelines and outcomes;
- automate certain internal business processes; and
- generate decision support for our staff.

These activities are carried out either with a qualified specialist reviewing the output ("human in the loop") or, where fully automated, under rigorous testing and ongoing monitoring to ensure accuracy, fairness and non-discrimination.

If you require further information as to how we use AI, please contact our Data Protection Officer by emailing DataProtection1@simplify.co.uk.

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

Information which you provide to us is stored on our secure servers located in the UK. However, data that we collect from you may also be transferred to, or processed in, a destination outside the UK. In particular, we have operations centers in India which access, and process data and we engage some third parties that may store or process personal data outside of the UK. Where it is transferred outside the UK we will take all steps reasonably necessary to ensure that your information is treated securely and in accordance with our Privacy Notice.

Some AI services are provided from approved locations within the EU/UK or, where applicable, the United States under the UK-US Data Bridge adequacy regulations. Certified US providers must adhere to the Data Privacy Framework Principles before we transfer data.

If you require further information as to where your personal data is transferred to, and the measures we have implemented to safeguard that information, please contact our Data Protection Officer by emailing DataProtection1@simplify.co.uk.

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 DataProtection1@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 links 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.

Data Security

We implement a range of technical and organisational measures to protect personal data from unauthorised access, loss or misuse. These include access controls, encryption, monitoring systems and data loss prevention (DLP) tools designed to detect and prevent unauthorised access or transmission of data.

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.

Data retention for AI

Personal data used to train or operate AI systems is retained only for as long as needed to achieve the purpose for which it was collected, after which it is securely deleted, aggregated or anonymised. Model-generated artefacts that can no longer be linked to you may be kept for longer to improve system performance.

Keeping AI fair and secure

We apply proportionate testing for bias, accuracy and security throughout the AI lifecycle and maintain audit logs of model behaviour. Our governance framework assigns clear accountability for AI oversight and regular review.

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. Where a decision produces legal or similarly significant effects for you and is based solely on automated processing, you have the right to:
    i. Obtain meaningful information about the logic involved
    ii. Request human intervention and to express your point of view
    iii. Challenge the decision

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

Simplify Data Protection Team
1 Frances
Way, Grove

Park,
Leicester
LE19 1SH
DataProtection1@Simplify.co.uk

Right to Complain

If you believe we have mishandled your personal data, failed to uphold your data protection rights, or not responded appropriately to a data protection request, you may submit a complaint using one of the following methods:

Simplify Data Protection Team
1 Frances
Way, Grove
Park,
Leicester
LE19 1SH
DataProtection1@Simplify.co.uk

Alternatively, you can submit an electronic complaint form online.

If you remain dissatisfied with our handling of your complaint, you may contact directly the Information Commissioner's Officer (ICO) to ask them to consider the complaint further. Their details are:

Tel: 0303 123 1113
Website: https://ico.org.uk

You can make a complaint through their website.

The ICO will expect that you have allowed us to consider and respond to your complaint in the first instance.

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: July 2025
Date of Next Review: July 2026