

## PRIVACY POLICY

(“We”) Cleverlaw Limited trading as Cleverlaw.co.uk are committed to protecting and respecting your privacy. Our Privacy Policy applies to all visitors of our website.

This policy (together with our Terms of Use and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed and used by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. Your data will only be used in a manner that is consistent with our obligations and your rights under law.

Our site, from time to time, may contain links to third party websites. We do not have any control over how your data is collected, stored, or processed by other websites. Please ensure that you refer to the other company’s privacy policy before providing any data to them.

For the purpose of the General Data Protection Regulations (GDPR) the data controller is Cleverlaw Limited of 3 Hardman Street, Manchester, M3 3HF. Our Data Protection Registration Number is Z1930341.

We take your privacy seriously and will only use your personal information to provide you the products and services you have requested from us and to administer your portal account.

We receive, hold and process information relating to individuals (‘personal data’) in accordance with GDPR. In doing so, the company is committed to maintaining the privacy and protection of all personal data collected in pursuance of its services. As a company we are further committed to ensuring that our website is secure in the collection and use of your personal information.

## INFORMATION WE MAY COLLECT FROM YOU

When you subscribe for, or enquire about our template services, or other services, we will collect and process personal information about you which may include the following:

- **Information you give to us.** You may give us personal information about you by filling in forms on our site [www.cleverlaw.co.uk](http://www.cleverlaw.co.uk) (our site) or by corresponding with us by phone, e-mail, letter, or method chosen by you. This includes information you provide when you register to use our site, subscribe to our service, and when you report a problem with our site. The information which you provide to us may include your name, address, e-mail address and phone number, financial and credit information and debit/credit card information.
- **Information we collect about you.** With regard to each of your visits to our site we may automatically collect the following information:
  - technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type

and version, time zone setting, browser plug-in types and versions, operating system and platform;

- information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- to make suggestions and recommendations to you and other users of our site about products or services that may interest you or them.
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• **Information we receive from other sources.** We may receive information about you if you use any of the other websites we operate or the other services we provide. We are also working closely with third parties (including, for example, affiliates, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers) and may receive information about you from them. This is because in order to satisfy your enquiry data must be processed by these third parties. In this case you will have been informed when the data was collected and provided consent for the data to be shared with us.

## **HOW WE COLLECT AND USE THIS INFORMATION**

Our use of your personal data will always have a lawful basis, either because it is necessary for our performance of a contract with you, or to take steps, at your request, to enter into a contractual relationship.

We will rely on your consent to share your personal information with third parties to send you marketing information about similar products and services that you may be interested in.

We will rely on the legitimate interest lawful basis to process your personal information to send you future marketing about our products and services you may be interested in.

We may use information held about you in the following ways:

• **Information you give to us. We will use this information:**

- to carry out our obligations arising from any agreement/contract entered into between you and us and to provide you with the information, products and template services that you request from us;
- to notify you about changes to our service;
- to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you. If you are an existing customer, we will only contact you by electronic means (e-mail or SMS)

with information about goods and services similar to those which were the subject of a previous sale or negotiations of a sale to you.

- If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have given express consent to do so.
- to process your information for the purpose in which you enquired and assess affordability
- to notify you about changes to our service;
- to ensure that content from our site is presented in the most effective manner for you and for your device.

• **Information we collect about you. We will use this information:**

- to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our site to ensure that content is presented in the most effective manner for you and for your device;
- to allow you to participate in interactive features of our service, when you choose to do so;
- as part of our efforts to keep our site safe and secure;
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- to make suggestions and recommendations to you and other users of our site about products or services that may interest you or them.
- To request a review of our services for brand awareness

• **Information we receive from other sources.** We may combine this information with information you give to us and information we collect about you.

With your agreement, we may wish to contact you by email, SMS, post, or phone with information about other products or services which may be of interest to you. These communications may be from us or other members of The Group or it may be from other organisations offering financial products and services or from other organisations whose products or services we think may be of interest to you. We will only transfer your personal data to third parties for marketing purposes with your express consent to do so. We will notify you about the identity of third parties in order for you to provide informed consent.

## **DISCLOSURE OF YOUR INFORMATION**

We may disclose your personal information with third parties, either as required by law or as you have provided consent to do so.

We may share your information with selected third parties including:

- Business partners, suppliers, and sub-contractors for the performance of any contract we enter into with them or you, but only if you have given consent for us to do so.

- Analytics and search engine providers that assist us in the improvement and optimisation of our site. We may disclose your personal information to third parties:
- If On-Line Legal Documents Limited or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use.

We may share your information with other companies within Valour Group (UK) PLC, any of whom may be able to provide you with a service that may be of use to you, but only if you have given consent for us to do so.

- We may share your information with Feefo Holdings Ltd for the purpose of providing a review of our services based on your experience with us. We will not provide any personal information on any publicised reviews, and the reviews are conducted primarily for internal review purposes. We will seek your prior discretion to conduct such a request.

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#### **WHERE WE STORE YOUR PERSONAL DATA AND HOW LONG DO WE HOLD IT FOR**

Your information is stored electronically within our servers and case management systems. Some of your information is segregated to reduce risk, access is controlled, and our systems are backed up regularly to ensure integrity. Any payment transactions will be encrypted using SSL technology.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

Where we have given a password code which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

How long we keep your information for depends on the basis on which it was provided. Generally, however, we will keep the information that is necessary to enable us to provide you with a service that you have requested for as long as it takes us to provide that service. If you have asked that we do not use your details for marketing purposes, we may still need to keep them to ensure our systems reflect your preferences. In these circumstances we will only retain minimum information to enable us to honour your suppression request.

We will generally keep records of any transactions you enter into for a minimum of six years from the end of the relationship. This is so that we can respond to any complaints or disputes that arise in that period. Otherwise we will keep the information where appropriate for legitimate business needs, namely future marketing of products and services which may interest you. We will always give you the option to opt-out of receiving any future marketing communication within each communication.

We will keep other information about you if it is necessary for us to do so to comply with the law, regulations, or where appropriate for legitimate business needs, namely marketing. For any marketing purposes for which you consented to, we shall keep your information no longer than it is necessary to comply with this objective, namely until you notify us of a change in your marketing preference.

## **YOUR RIGHTS / OPT-OUT**

Please contact us if you have any reason to believe the data we hold on you is inaccurate. You may review, correct, update, or change your personal information at any time by contacting us as set out at the end of this Privacy Policy.

You can see what information we hold about you by asking us for a copy at any time. We will also tell you where the information was obtained from. You will need to put your request in writing and we will respond within one calendar month, there is no fee chargeable for this request.

Should you wish to obtain a copy of the personal data we hold on you please write to the relevant company at the address shown below. As soon as we are satisfied as to your identity we will send you, and within the legislated time, depending on the date of your request, a copy of all the data we hold concerning you.

You have the right to ask us not to process your personal data for marketing purposes. If you do not want us to use your personal data to contact you by electronic means (email or SMS) with information about other products offered by any company within the Valour Group (UK) Plc, or other third parties you can revoke your consent by opting out please contact us at [opt-out@cleverlaw.co.uk](mailto:opt-out@cleverlaw.co.uk).

### **Information Commissioners Office.**

If you are not satisfied with how we handle your personal data, in the first instance, please contact [info@cleverlaw.co.uk](mailto:info@cleverlaw.co.uk), Should, you remain dis-satisfied, then you may contact the Information Commissioners Office:

Address: Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Tel No: 0303 123 1113

Website: <https://ico.org.uk/concerns/>

### **CHANGES TO OUR PRIVACY POLICY**

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

### **CONTACT**

Questions, comments, and requests regarding this privacy policy are welcomed and should be addressed to Cleverlaw.co.uk, 3 Hardman Street, Manchester, M3 3HF or sent by email to [info@cleverlaw.co.uk](mailto:info@cleverlaw.co.uk).