



InfoTrack Data Privacy Statement

This is a statement outlining how the InfoTrack Limited (InfoTrack) meets its obligations under the Data Protection Act 1998 ("the Act").

The statement is subject to regular review to reflect, for example, changes to legislation or to the structure or policies of InfoTrack. The statement is made available to all staff, partners and clients.

InfoTrack needs to collect and use certain types of information about people with whom it deals, in order to operate.

These include: current and previously authorised persons; live, insolvent and departed firms including all forms of authorised firms; current, past and prospective clients; InfoTrack's own employees; suppliers and others with whom InfoTrack conducts business.

In addition to carrying out our own statutory functions, InfoTrack may occasionally be required to collect and use certain types of information of this kind to comply with the requirements of government departments or legislation.

InfoTrack regards the lawful and correct use of personal information as important to the achievement of our objectives, to the success of our operations and to maintaining confidence between those with whom we deal and ourselves. We therefore aim to ensure that our organisation treats personal information lawfully and correctly.

We fully endorse and adhere to the principles of data protection, as set out in the Data Protection Act 1998 ("the Act").

The eight principles under that Act require that personal information:

1. must be processed fairly and lawfully and, in particular, must not be processed unless specific conditions are met;
2. must be obtained only for one or more specified lawful purposes, and must not be further processed in any manner incompatible with that purpose or those purposes;
3. must be adequate, relevant and not excessive in relation to the purpose or purposes for which it is processed;
4. must be accurate and, where necessary, kept up-to-date;
5. must not be kept for longer than is necessary for the specified purpose(s);
6. must be processed in accordance with the rights of data subjects under the Act;
7. should be subject to appropriate technical and organisational measures to prevent the unauthorised or unlawful processing of personal data, or the accidental loss, destruction, or damage to personal data;
8. must not be transferred to a country or territory outside the European Economic Area ("EEA") subject to certain exceptions.



In light of these obligations, InfoTrack, through appropriate management and controls, will:

- observe the conditions regarding the fair collection and use of personal information;
- meet our legal obligations to specify the purpose(s) for which the personal information is to be used;
- collect and process personal information only to the extent that it is needed to fulfil our operational needs or to comply with any legal requirements;
- ensure the quality of the personal information used;
- ensure that personal information is held for no longer than necessary;
- ensure that the rights of people about whom the information is held can be exercised under the Act e.g. the right to access one's personal information, to prevent processing in certain circumstances and to correct, rectify, block or erase information where it is wrong etc.
- take appropriate technical and organisational measures to safeguard personal information;
- ensure that personal information is not transferred or replicated outside the EEA. As such, all data is stored within secure Amazon Web Services (AWS), Ireland.

In order to achieve compliance with the Act and its principles, InfoTrack has created and implemented various internal policies and procedures, available to all staff, outlining individual and organisational data protection responsibilities and providing detailed guidance on InfoTrack internal data protection procedures.

InfoTrack Privacy Policy

This Privacy Policy relates to the business operated in the United Kingdom by InfoTrack Limited ("InfoTrack" or "we", "our" or "us"). InfoTrack complies with the UK Data Protection Act 1998 ("the Act") and is committed to the protection of privacy in accordance with the applicable law. This Privacy Policy sets out how we treat the personal information and personal data that we collect, use and disclose and our procedures regarding the handling of personal information and data, including collection, use, disclosure and storage of information, as well as the right of individuals to access and correct that information.

InfoTrack may collect personal information and data in order to conduct our business, to provide and market our services and to meet our legal obligations. By using our website or our services, or by providing any personal information to us, you consent to the collection, use and disclosure of your personal information as set out in this Privacy Policy.



1. The types of personal information we collect

The type of information we may collect and hold includes (but is not limited to) personal information about:

- clients, business associates and potential clients and their employees;
- suppliers and their employees; and
- prospective employees and contractors.

Personal information may consist of names, addresses, contact details, occupations and other information and generally will include:

- name, address, contact telephone numbers, email addresses and other contact or identity details
- payment information (such as credit card or bank details)
- other personal information required to provide our services in specific cases
- personal data or details of your use of our products or services
- personal information of third parties in connection with the products or services you request or order from us, such as the information disclosed in searches of public records you undertake when you use our products or services.

You are not obliged to provide personal information to InfoTrack, however in many cases, if personal information we request is not provided, we may not be able to supply the relevant product or service that you have requested from us.

If you provide to us, and we may collect from you, personal information or personal data of a third party, it is your responsibility to ensure that the third party is aware of our Privacy Policy.

If it is necessary to provide specific services to you, we may collect sensitive information about you (health information, information about racial or ethnic origin, criminal records, information about religious affiliation and political opinions), but only if you agree to provide it to us or authorise us to obtain it from a third party. We will only use sensitive information in accordance with the Act and only for the purpose for which it is provided or purpose disclosed in this Privacy Policy.



2. How personal information is collected and held by us

We collect personal information from you when you:

- apply to become a customer or user of our products or services
- fill in and return to us a signed client form
- use our services by logging into our system or ordering products or services from us via our website, by phone, email or in other ways
- enter personal information into our system about you or other persons in connection with your use of our products or services
- store details of products or services you have ordered or information and data contained in the particular products or services you have ordered - for example if you order a title search which includes personal information and we store that search information so you can retrieve it again later on.

InfoTrack does not normally actively view or use general browsing information or personal data to identify users or their browsing activities, although data relating to these activities may be collected and stored on file servers. We may however store this data for the purposes of audits, later enquiries by you or in the event of a dispute. Otherwise, personal data would normally only be accessed in the event of an investigation or if a law enforcement agency requires access to information held by us or our service providers.

We store personal information in computer storage facilities, paper-based files and other records. We take steps to protect the personal information against loss, unauthorised access, use modification or disclosure, and against other misuse. These steps include password protection and access privileges for accessing our IT system, encryption of data stored and physical access restrictions to paper files. Some of these services, such as hosting our computer file servers, are provided by third parties in the UK and we endeavour to ensure that they also have adequate privacy safeguards in place through the use of contractual measures to protect personal information and data.

Because transmission of information over the internet is often insecure we do not accept responsibility for the security of information you send to or receive from us over the internet, or for any unauthorised access or use of that information by others over the internet.



3. The purposes for which we collect, use and disclose personal information

Except as otherwise specified in this Privacy Policy, we will only use personal information for the purposes connected with providing our products and services and will not use or shares your personal information for any other purpose without first obtaining your consent or unless required by law.

We use personal information for the following purposes:

- to set up your account with us, which may include confirming your identity and obtaining a credit or reference check from a third party;
- to provide the products or services you have requested from us;
- to answer enquiries you make;
- for payment processing;
- for direct marketing and promotion and improvement of our business and products and services including:
 - to notify you of details of new services and products offered by us;
 - to notify you of details of meetings, events and seminars that may be of interest to InfoTrack customers and clients;
 - to send you our newsletters and other marketing publications;
- to administer our databases for client services, marketing, credit control and financial accounting purposes;
- to comply with legal requirements regarding collection and retention of information concerning the products and services that we provide; and
- for any enforcement or legal compliance purposes including any breaches by you of your agreement with us, our terms of use or our privacy policy.

We may disclose your personal information third party service providers who assist us in providing the services you request, including public authorities and providers of information services.

We may also disclose your personal information to third parties who work with us in our business to promote, market or improve the services that we provide, including:

- providers of customer relations management database services and marketing database services;
- marketing consultants, promotion companies and website hosts; and
- consultants and professional advisers.

We may also combine your personal information with information available from other sources, including the entities mentioned above, to help us provide better services to you.

You may opt-out of receiving direct marketing or the disclosure your personal information for the purpose of direct marketing by contacting our privacy officer using the details set out below or by using any unsubscribe facility contained in a communication that you receive from us.



4. Where we store your personal information

The data that we collect from you will be transferred, stored and processed at, a destination within the European Economic Area (“EEA”).

5. How you can access your personal information

You have a right to request access to your personal information and to request its correction. We will take all reasonably practicable steps to make sure that the personal information we collect, use or disclose is accurate, complete and up to date.

At your request, we will provide you with a copy of any personal information which we hold about you, unless an exception under the Act applies. We may charge a reasonable fee for retrieving this information, in which case we will inform you of the fee and seek your agreement to that fee before providing the information.

6. How to contact us or make a complaint

If you have any questions about this Privacy Policy, if you wish to correct or update information we hold about you or if you wish to make a complaint about the way we have collected, disclosed or used your personal information, please contact:

InfoTrack Privacy Officer

Privacy-Uk@infotrack.co.uk

We will acknowledge and investigate any complaint about the way we manage personal information as soon as practicable. We will take reasonable steps to remedy any failure to comply with our privacy obligations.

Website

Information that may identify you as a user may be gathered during your access with our website and this privacy statement details how such information is collected, stored and used. We are not responsible for the privacy policies or privacy practices of the organisations we provide links to from our website. We suggest that you check the privacy policies and practices of those organisations.



7. Cookies

A 'cookie' is a piece of information that allows the server to identify and interact more effectively with your computer. The cookie assists us in identifying what our users find interesting on our website.

When you use our website we allocate you a unique identification number (cookie). A cookie will be allocated each time you use our website. The cookie does not identify you as a user in our data collection process. It does identify your Internet Server Provider.

You can configure your web browser to refuse cookies but you then may not be able to use all or part of our website.

Updating Our Privacy Policy

This Privacy Policy may be updated from time to time so we recommend you review the information on our website on a regular basis.