

This notice describes how CLS, as a data controller, collects, uses, shares and retains the Personal Data You provide and informs You about Your choices regarding use, access and correction of Your Personal Data. CLS is committed to ensuring that any Personal Data it receives is protected and handled in accordance with applicable data protection laws. In this Privacy Notice, “We”, “Us” and “Our” refers to CLS. “CLS” means the following companies: CLS Property Insight Limited registered in England and Wales with company number 06993053, authorised and regulated by the Financial Conduct Authority (“FCA”). CLS Group Services Limited registered in England and Wales with company number 07054613 and CLS Data Limited registered in England and Wales with company number 10446473.

This Privacy Policy is separate from and not intended to override the terms of any contract We may have with You or Your rights under data protection laws.

When We say, “You” and “Your” in this notice, We mean anyone whose Personal Data We may collect, including:

- Anyone seeking a quote from Us or whose details are provided during the quotation process
- Anyone placing an order for a product with Us and/or requesting services from Us
- Policyholders and anyone named on or covered by the policy
- Anyone who may benefit from or be directly involved in the policy or a claim, including claimants and witnesses.

If You are ordering products from CLS through a third party such as a solicitor, broker or other intermediary, they may have their own reasons for processing Your Personal Data. Please contact them directly should You require further information about their uses of Your Personal Data.

Collection of data

- Personal Data, means any information from which that person can be identified. It does not include data where the identity has been removed (anonymous data).
- CLS may collect a range of personal and business information supplied by You or third parties on Your behalf. Wherever We collect or use Personal Data, We will make sure We do this for a valid legal reason. This information may include the following: basic personal details such as Your name, address, telephone number, gender, marital status, financial details, identification checks and background information, credit history, credit score, sanctions check results, information received from various anti-fraud databases, additional information about Your order or account requirements, such as details of Your Business, and marketing and communications data which includes Your preferences in receiving marketing from Us and our third parties and Your communication preferences.
- CLS may also collect data about You, Your business or the property for which the order is placed from a number of different sources, including but not limited to the electoral roll, third party databases available, other insurance or property search firms, loss adjusters and/or other parties involved in the process of administering a claim, as well as publicly available sources.

We will always attempt to explain clearly when and why We need this information and the purposes for which We will use it and where necessary, We will obtain Your explicit consent to use Personal Data.

We may record or monitor telephone calls in order to ensure accuracy in the recording of instructions communicated to Us, to facilitate staff training, for the prevention of fraud, for management of complaints and to improve customer satisfaction.

You can visit our site without providing Us with any information about yourself. You do not have to provide Us with any Personal Data, but if You do not provide the Personal Data that We need, We may not be able to proceed with Your account registration, order or any claim that You may make.

We do log Your IP address (the Internet address of Your computer) to provide Us with an idea of which part of the site You visit and how long You spend there.

Your IP address is not linked to anything personally identifiable. We also log the computer, operating system and browser type that You are using. This information is automatically provided by Your browser.

Our website does not enable our visitors to communicate with other visitors or to post information to be accessed by others.

The website operated by CLS may provide links to other sites. When You click on one of these links Your browser will download pages from the other site. You should satisfy yourself that You are comfortable with the privacy policy adopted by any site You visit. CLS supports and advocates ethical policies with regards to privacy and data protection but cannot be held responsible for the actions of any other site.

Although We take reasonable steps to validate links, such links are for information only and do not represent any undertakings as to the availability, merits or behaviour of any site or organisation.

“Cookies”

Sometimes it is useful for the CLS web site to remember You when You come back to the site. The way We do this is by storing a small file on Your computer, known as a "cookie" which can only be seen by the CLS website and will not expose You to any security risk. A cookie is perfectly safe and doesn't affect the performance of Your computer in any way but it does mean that if You are using the same computer We can recognise You when You come back to our site.

We do not use cookies to store Personal Data nor do We link non-Personal Data stored in cookies with Personal Data about specific individuals.

Personal Data about others

We may collect Personal Data about other individuals, such as employees, clients, family, or members of Your household. If You give Us information about another person, it is Your responsibility to ensure You have a lawful basis for transferring their Personal Data or confirm that You have told that person why and how CLS uses Personal Data and that You have that person's permission to provide that Personal Data to us and for us to process it.

Our uses of data

CLS will only use Your Personal Data when the law allows us to. Most commonly, We use the Personal Data in the following circumstances:

CLS uses the Personal Data We collect to operate Our business and provide the products we offer. The information We collect may be used for (amongst other purposes) the following: to assess Your application for an account, quote or product; to evaluate the risk You present; to verify Your identity; to register You as a new customer; to administer Your order and deliver our services; to conduct statistical analysis for pricing purposes;

to administer claims; to investigate and resolve complaints; to manage our business relationship with You, to enable You to partake in a prize draw or complete a survey; to administer and protect Our business and Our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data; to make suggestions; to make suggestions and recommendations to You about CLS products or services that may be of interest to You.

Should the need arise, CLS may also use Personal Data for the following purposes: to collate Your Policy or claims history; to undertake credit referencing or credit scoring and to assist with financial crime and fraud detection.

CLS may use Your Personal Data where it is necessary for Our legitimate interests (which means the interest of our business in conducting and managing our business to enable us to give You the best service/product and most secure experience) (or those of a third party) and Your interests and fundamental rights do not override those interests.

Generally, We do not rely on consent as a legal basis for processing Your Personal Data although We will get Your consent before sending third party direct marketing communications to you via email. You have the right to withdraw consent to marketing at any time by contacting Us.

Marketing

We strive to provide You choices regarding certain Personal Data uses, particularly around marketing and advertising.

Promotional offers from Us

We may use Your Personal Data to form a view on what we think you may want or need, or what may be of interest to You. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from Us if You have requested from Us or purchases products or services from Us and you have not opted out of receiving that marketing.

Third-party marketing

We will get Your express opt-in consent before we share your Personal Data with any third party for marketing purposes.

Opting out

You can ask Us or third parties to stop sending You marketing messages at any time by logging into the website and checking or unchecking relevant boxes or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to Personal Data provided to Us as a result of a product or service purchase, other business transactions

Sharing Your data

If You request a quote, or purchase a product, Your Personal Data may be shared with and processed by a number of third parties which include but are not limited to regulatory, dispute resolution or law enforcement bodies; other insurance organisations including reinsurers; fraud prevention and credit reference agencies (who may keep a record of the search); or other relevant third parties within Our administrative structure or with prospective buyers or purchasers in the event CLS wishes to sell all or part of its business.

Your Personal Data may be disclosed when We believe in good faith that the disclosure is required by law; necessary to protect the safety of Our employees or the public; required to comply with a judicial proceeding, court order or legal process; or for the prevention or detection of crime (including fraud).

For Bonds and Estate Administration, CLS shares Personal Data with third party suppliers in order to fulfil the Bond/Estate Administration services. The third party suppliers, provide mandatory administration to the Bonds/Estate Administration services therefore consent to this specific data being shared cannot be withheld. If You do not consent to CLS sharing this Personal Data, then the Bond/Estate Administration services cannot be provided.

We will only share Your information in compliance with data protection laws.

Transfer and Storage of Your Data Overseas

Personal Data may be transferred to countries outside the UK. They will at all times be held securely and handled with the utmost care in accordance with all applicable principles of English law. Personal Data will not be transferred outside the UK unless the transfer is to a country which is considered to have equivalent standards with regard to data protection, or We have taken reasonable steps to ensure that suitable data protection standards are in place.

Data Retention

CLS will only keep Personal Data for as long as it is necessary to continue providing our products and services to You and/or to fulfil our legal and regulatory obligations in line with Our data retention policy.

Data Subject Rights

You have a number of rights in relation to the information We hold about You. These include: the right to object to the use of Your Personal Data to the right to ask for a copy of the Personal Data We hold about You, subject to certain exemptions; the right to ask Us to update or correct Your Personal Data to keep it accurate; the right to withdraw any permission You have previously provided; the right to ask Us to delete Your Personal Data from our records if it is no longer needed for the original purpose; the right to ask Us to restrict the use of Your Personal data in certain circumstances; and the right to complain about how We handle Your Personal Data (see 'Who to contact' below).

Please note that there are times when We will not be able to delete Your Personal Data. This may be as a result of a requirement to fulfil Our legal and regulatory obligations, or where there is a minimum statutory period of time for which We have to keep Your Personal Data. If We are unable to fulfil a request We will always let You know our reasons.

Who to contact

If You wish to exercise any of Your rights or have any queries about how We use Your Personal Data, please contact our Compliance Officer at: 26 Kings Hill Avenue, West Malling, Kent ME19 4AE or by email: compliance@cls.co.uk or by telephone: 01732 753 910.

We will consider Your request and either comply with it or explain why We are not able to. Please note, We may request evidence of Your identity to process Your request.

If You are not happy with any aspect of how We handle Your Personal Data, We encourage You to come to Us in the first instance but You are entitled to complain to the Information Commissioner's Office (ICO):

Writing: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Telephone: 0303 123 1113 (local rate) 01625 545 745 (National Rate)

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

Changes to this Data Privacy Notice

We may amend this Data Privacy Notice from time to time for example, to keep it up to date or to comply with legal requirements. Should any significant changes be made to the ways in which CLS processes Personal Data from those described at the time of collection, We will post a notice on Our website.