

Countrywide Group Privacy Notice

The Countrywide privacy notice provides information on how Countrywide and any of its subsidiaries, branches or representative offices and any 3rd party providers collect, use, secure, transfer and share your information. Countrywide Group and its affiliates (Countrywide), is a leading provider of Residential development and consultancy practices, Surveying Services, Conveyancing services, Corporate Property Services, Leasehold Estate Management and Auctions. It operates in over 900 locations across more than 50 brands, with over 10,000 employees within the UK.

Countrywide has its head office at

7th Floor
UK House
180 Oxford Street
London
W1D 1NN

It serves most major lenders, investors, house builders, commercial businesses, corporations, local authorities, housing associations and the general public via the following business units / divisions. Full details can be found on our website

<http://www.countrywide.co.uk/about/>

Financial Services	This division includes the UK's largest single mortgage brokerage and also offers expert advice on life and general insurance.
Surveying	Countrywide Surveying Services (CSS) panel manage and undertake valuations for the majority of UK mortgage lenders.
Conveyancing	Countrywide Conveyancing Services (CCS) operates conveyancing business, panel management and property lawyer firm in the UK, offering: Sale and purchase (freehold and leasehold), Remortgage and Separate legal representation.
Asset Management	Countrywide Corporate Property Services (CCPS) offer services in the disposal of residential property assets to corporate clients in the following sectors: Repossession asset management, Part exchange sale, Corporate property sales and In-house maintenance services.
Property Management	Countrywide Estate Management (CEM) specialises in property management, providing leasehold and estate management services.
Residential Development	This division is the UK's largest land & new homes agency and offers services to new buyers, national land opportunities and dedicated new homes property lawyers.
Property Auctions	This division uses the largest estate agency network for property auctions
Marketing	Markets Countrywide services via a suite of websites and other means
Retail	Sales and lettings service
Relocations	Countrywide Relocation Solutions (CRS) offers a comprehensive

	facilitation service providing pre-funded temporary accommodation across the UK.
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1 Types of information collected.

Typically Countrywide collect:

1. First Name	21. How many Dependants	41. Personal /Secure Loan Details	61. IP Address
2. Middle Name	22. Dependants Name	42. Personal Debt Details	62. Cookies
3. Surname	23. Dependants DOB	43. Personal Expenditure	63. Marital Status
4. Previous Name	24. Primary ID *	44. Existing Mortgage Details	64. Salary
5. Date of birth	25. Address ID *	45. Existing Insurance Details	65. Accountant Details
6. Present Address	26. Bank Statements *	46. Email Address	66. Previous employers details
7. Residential Status	27. Credit Card Statements *	47. Phone Numbers	67. Employers Address
8. Previous Addresses	28. Mortgage Statements *	48. New Property Details	68. Employers Phone number
9. Landlord Details	29. Proof of Deposit	49. Solicitor Details	69. Health
10. Nationality	30. Payslips *	50. Estate Agent Details	70. Ethnicity
11. NI Number	31. Self Employed Accounts *	51. New Mortgage Details	71. Credit Card Details
12. UK National	32. Employers Name	52. New Insurance Details	72. Bank Details
13. Doctors Details	33. Gender	53. Criminal Offences /Convictions	

*Copies

1.1 Methods of collection

In the general conduct of business, Countrywide collects information relevant to the services being sought across the range of services it offers (listed previously) from:

- yourself
- next of kin
- spouse / partner / family member
- business associates
- Employers
- “trusted” sources including:
 - Government / Land / Police registers
 - Credit / Default Agencies
 - Financial Institutes (Banks, Building Societies, Loan Agencies, Credit Card companies)
 - Insurance Companies

- Other Law firms
- Health providers
- through consent to third parties disclosing information about you to us that they have collected

Such information will generally be collected directly via the use of any of our standard forms, over the internet, via email, in our branches or through a telephone conversation with you. We may also collect personal information through our affiliates or suppliers.

In addition, you may choose to submit information directly to us via several methods, including:

- through Countrywide and affiliates websites
- in response to marketing or other communications
- through social media
- by signing up for a Countrywide product or service
- through participation in an offer, program or promotion
- in connection with an actual or potential business or employment relationship with us

You may also agree to third parties disclosing information about you to us that those third parties have collected.

We, our service providers and partners collect certain information by using automated means, such as cookies and web beacons, when you interact with our advertisements, mobile applications, or visit our websites, pages or other digital assets. The information we collect in this manner may include: IP address, browser type, operating system, referring URLs and information on actions taken or interaction with our digital assets.

We may use third-party web analytics services on our websites and mobile apps the analytics providers that administer these services use technologies such as cookies and web beacons to help us analyse how visitors use our websites and apps.

"Your Rights and Choices" section of this Privacy Notice specifies your ability, to opt out or limit the usage of the information collected.

1.2 Purposes of collection

Generally, we will collect, use and hold your information for the purposes of:

- Assessing applications for and providing Countrywide products / services
- Conducting business, developing relationships with Countrywide and affiliates
 - Process payments / transactions including: Accounting, Authorisation, Clearing, Chargebacks, Auditing, Billing, Reconciliation, Collection, Complaints, Enquiries, Credit Checks and related dispute resolution activities
- Protect against and prevent fraud, unauthorised transactions, money laundering (please see below), tax evasion, claims, other liabilities and manage risk exposure and agent /franchise quality, integrity, compliance and security of business processes
- Create and manage any accounts, associated authentication criteria (id's and passwords) you may have with Countrywide
- Provide, administer and communicate with you about Countrywide products, services, offers, programs and promotions, their issuers, acquirers, retailers and partners.
- Compile business directories, including business contact information

- Operate, monitor, evaluate and improve our products, services, websites, mobile applications, other digital assets and business.
 - Developing new products and services
 - Managing communications, assess effectiveness and optimisation of advertising
 - Functionality of our websites, mobile applications other digital assets
- Evaluate your interest in employment and contact you regarding possible employment opportunities
- Enforce Countrywide “Terms of Use”, other legal rights as may be required by applicable laws and regulations or requested by any judicial process or governmental agency having or claiming jurisdiction over Countrywide or its affiliates.
- Comply with industry standards and Countrywide policies

Anti-Money Laundering

In addition to help you with a property related service we have to comply with certain regulations for example the “Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (referred to as “the Regulations).” Countrywide Estate Agents (CEA) and other subsidiaries are required to obtain certain information from you to comply with regulations. The information provided will only be used by Countrywide Plc in relation to complying with the Regulations and will not be shared with any other party outside of the companies wholly owned by Countrywide Plc unless we are required to do so under law.

If you decide to enter in to a business relationship with Countrywide Estate Agents or any wholly owned subsidiary to comply with certain regulations.

We will require two separate Identification documents one primary and one secondary document even if it appears on both lists. The information may be required at various stages of the process depending whether you are:

Purchasing (or Selling)

Primary documents - proof of ID

- Valid Passport with MRZ
- Valid full UK photo driving licence
- Valid full UK Driving licence (Non photo, paper) issued before 1998
- Valid EU/EEA/Switzerland photo driving licence.
- Valid EU/EEA/Switzerland national Identity Card.
- Valid UK Armed Forces ID Card.
- Valid UK Biometric Residence Permit (copy of both sides.)
- Valid Blue disabled drivers pass. (With photo)
- Valid Freedom Pass
- Valid Local Authority Bus pass.
- Department for Works & Pensions letter confirming pension details including National Insurance Number dated within the last 12 months.

Secondary documents - proof of residence (home.)

- Valid full UK photo driving licence.
- Valid full UK Driving licence (Non photo, paper) issued before 1998
- Local authority council tax bill (dated within the last 12 months).
- UK Bank / Building societies statements/bills showing activity, dated within the last six months. Including account number and sort code. (Internet printed acceptable.)

- UK mortgage statement (dated within the last 12 months.) (Internet printed acceptable.)
- Utility bill dated within the last 6 months including - Electricity bill (with MPAN number), Landline, Gas, Satellite TV, Water. (Internet printed acceptable.) (Not mobile phone bills.)
- Her Majesty's Revenue and Customs (HMRC) Inland Revenue (IR) Coding / assessment / statement (dated within the last 12 months) with National Insurance number.
- Department for Works & Pensions letter confirming pension details and NI Number. (Dated within the last 12 months).

We reserve the right to employ third party electronic verification for the purpose of verifying identity. This search will not affect your credit rating

1.3 Lawful basis of processing

Countrywide processes your information under the following

- Performance of a contract: where you enter into a contract with Countrywide and we need to process your information as part of this contract
- Legitimate interests: some information is processed by Countrywide as part of its legitimate interests which include: Fraud, risk assessment, due diligence, network and information security, suppressions and managing opting out of communications, profiling, direct marketing, monitoring, web analytics, cloud storage, acquisitions, updating customer details, lettings, sales, financial services and other core products and service provided by the data controller
- Public interest: some information is processed in accordance public interest such as relocations
- Consent: where we process information under consent we will seek you clear and unambiguous consent prior to processing your data

2 Information we share

We do not sell or otherwise disclose personal information we collect about you, except as described in this Privacy Notice or as indicated via the consent process at the time the data is collected. We share the information we collect with, but not limited to:

- Vetted affiliates and partners / Financial Institutions / Insurance Companies for business facilitation to provide required services, such as mortgages, insurance cover etc.
- Formally contracted service providers to perform services on our behalf:
 - Hosting Datacentres, Infrastructure, Applications (Development / Support), Cloud Services (Software as a Service – SaaS, Platform as a Service – PaaS, Infrastructure as a Service – IaaS)
 - Helpdesk, Call Centres etc.

We contractually require these service providers to safeguard the privacy and security of personal information they process on our behalf and authorise them to

use or disclose the information only as necessary to perform services on our behalf or comply with legal requirements

- Councils, health and care providers
- Other Law firms
- Credit agencies, Land Registry Office, Her Majesty's Revenue and Customs (HMRC), Financial Conduct Authority (FCA) and other relevant regulatory bodies
- Additionally, we may share information about you, if required legally, to prevent harm or financial / reputation loss, for investigation of suspected or actual fraudulent or illegal activities.
- Perspective employers requesting references via your written consent

On websites, features can be accessed where we partner with other entities that are not affiliated with Countrywide. These include social networking, geo-location tools etc. are operated by third parties (indicated appropriately) who may use or share personal information in accordance with their own privacy policies. It is recommended that you review the third parties' privacy policies if you use the relevant features.

Countrywide reserve the right to transfer your information in the event of a sale or transfer (wholly or partially) of our business or assets, with reasonable efforts for the acquirer protect / use your information consistent with our Global Privacy Notice. You can exercise your rights to contact the acquiring entity with questions concerning the protection and processing of your information.

2.1 How long do we keep information for

We will keep information for a reasonable amount of time in order to perform the purposes listed above.

We only keep your information for as long as necessary. We generally keep personal information for 7 years after last contact with you. However Countrywide reserves the right to keep information for longer if we feel that this is in the legitimate interests of Countrywide.

2.2 International data transfers

Countrywide may transfer the personal information collected about you to recipients in countries other than the country in which the information was originally collected. Those countries may not have the same data protection laws as the country in which you initially provided the information. When we transfer your information to other countries, we will protect that information as described in this Privacy Notice or as otherwise disclosed to you at the time the data is collected (e.g. via program specific privacy notice).

We currently engage a company called WNS who are based in India. We have ensured that WNS meet the required privacy and security requirements through our contract with WNS. You can find out more about WNS here <http://www.wns.com/>

2.3 Profiling

For the purposes of business conduct, enhancement, identification of fraud, money laundering and other potential un-authorised activities, Countrywide engages profiling activities via direct use or anonymisation of sensitive personal information.

2.3.1 Direct profiling

Direct profiling is engaged for the fair and lawful purposes, to provide Countrywide the ability to enforce Countrywide “Terms of Use”, legal reporting as may be required by applicable laws, regulations, policies / standards or requested by any judicial process or governmental agency having or claiming jurisdiction over Countrywide or its affiliates; including, but not limited to:

- Benchmarking employees: appraisals, performance, bonus payments, disciplinary actions, improvement plans, promotions and awards.
- Background checks for existing and new employees, clients, business partners, affiliates
- Financial Viability analysis / reports
- Business partner / client portfolio position, performance, risk positions
- Anti-money laundering
- Tax reporting
- Credit defaulting / exposure

2.3.2 Indirect profiling

Indirect profiling via anonymisation of personal information is also used for preparing and furnishing aggregated data reports showing anonymised information, including, but not limited to, the following:

- Compilations, analyses, analytical and predictive models and rules, and other aggregated reports for the purpose of advising our partners / affiliates and servicing institutions, retailers and other customers regarding past and potential future patterns of service usage, spending, fraud, and other insights that may be extracted from this data.
- Compiling and communicating promotional and marketing information about products and services that Countrywide Group, affiliates and other organisations that we have affiliations with have and that may be of interest to you.
- Conducting market research
- Facilitating our internal business operations, including the fulfilment of any legal requirements.

2.4 Your rights and choices

Your rights regarding the sensitive / personal information we maintain about you enable you to exercise choices about what personal information we collect from you, how we use that information, and how we communicate with you.

2.5 Access and correction

You may have the right to:

- obtain confirmation that we hold personal information about you
- request access to and receive information about the personal information we maintain about you
- receive copies of the personal information we maintain about you

The right to access personal information may be limited in some circumstances by local law requirements.

To exercise these rights, please contact us as set forth below.

2.6 Update and correct inaccuracies in your personal information

If you feel that the information we hold about you is incorrect or inaccurate you can contact us outlining the information you feel is incorrect or inaccurate

If we refuse to correct your personal information, we will provide you with a written notice that sets out the reasons for our refusal (unless it would be unreasonable to provide those reasons) and provide you with a statement regarding the mechanisms available to you to make a complaint. We will provide you with access to information we hold about you:

2.7 Object to the processing of your personal information

If you would like to object to any processing of your information by Countrywide you can contact us outlining what processing of information you would like to object to.

2.8 Have the information blocked, anonymised or deleted.

If you would like countrywide to delete, block or anonymise information we hold about you, you can contact us outlining what information you would like deleted, blocked or anonymised.

To update your preferences, ask us to remove your information from our mailing lists or submit a request to access, update, correct or delete your personal information, please contact us as specified in the “How To Contact Us” section below.

2.9 Opting out of processing

You can opt out collection of personal information by automated means e.g. when visiting our website or visit third-party websites and interact with our adverts, by using the Cookie Consent tool displayed in the website (the browser you use may provide options on how to opt out of receiving certain types of cookies). However without cookies you may not be able to use all of the website features and/or online services.

Countrywide operate a cookie policy < content here>? Some of our service providers and partners may collect information about your online activities over time and across third-party websites to customise and target our adverts.

You can at any time tell us not to send you marketing communications by

- e-mail privacy@countrywide.co.uk
- unsubscribing via the “unsubscribe link” within the marketing e-mails you receive from us, or
- contacting Countrywide as indicated below.

2.10 Withdrawal of consent

If we obtain your information by consent you have the right to withdraw any consent you previously provided to us.

If we process your information under legitimate interest you can object at any time on legitimate grounds, to the processing of your personal information.

Countrywide we will apply your preferences going forward. Doing so will mean that you cannot take advantage of certain Countrywide and affiliate products, services and promotions.

The right to consent removal may be limited in some circumstances by local law requirements and you will be informed appropriately.

3 How to Contact Us / Complaints and Feedback

If you:

- make a complaint about a breach of your personal information, applicable privacy laws / principles or a concern about Countrywide privacy practices
- would like access and/or update information or preferences you provided to us,
- please click here <link to form>.

You also may e-mail us at:

privacy@countrywide.co.uk

Or write to us at:

John Sheehan Group Data Protection Officer

Countrywide House

88-103 Caldecotte Lake Drive

Caldecotte Lake Business Park

Caldecotte

Milton Keynes

MK7 8JT

If we fall short of your expectations in processing your personal information or you wish to make a complaint about our privacy practices, please contact us via the details in the "How To Contact Us" section below.

To assist us in responding to your request, please give full details of the issue. We attempt to review and respond to all complaints within a reasonable time.

If we cannot for lawful reasons complete your request we will explain this to you to the extent that we lawfully can.

3.1 How We Protect Personal Information

The security of your personal information is very important and Countrywide is committed to protecting the information we collect. We maintain administrative, technical and physical safeguards designed to protect the personal information you provide or we collect against accidental, unlawful or unauthorised destruction, loss, alteration, access, disclosure or use. We use SSL encryption on a number of our websites from which we transfer certain personal information.

Countrywide stores personal information only for as long as it is necessary for the fulfilment of the purpose for which the personal information was collected, unless otherwise required or authorised by applicable law. We take measures to destroy or permanently de-identify

personal information if required by law or if the personal information is no longer required for the purpose for which we collected it.

4 Updating this privacy statement

We will update this statement from time to time so we suggest that you review this statement at regular intervals. Where we undergo substantial changes to our privacy statement we will endeavour to inform you directly about these changes.

October 2017

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