Advantage Property Lawyers Privacy Notice

Introduction

This website is operated by Simplify Moving Limited on behalf of Advantage Property Lawyers Limited. Advantage Property Lawyers Limited is a registered company in England and Wales under company number 06750681 and with our registered office at Hurley House, 1 Dewsbury Road, Leeds, LS11 5DQ ("APL" "we", "us" or "our" in this policy).

APL is part of Simplify. Simplify is a group of individual companies. 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.

This privacy notice sets out how Advantage Property Lawyers Limited ("APL", "we", "us" or "our" in this notice) will use your personal data. Personal data is data which, by itself or with other data available, can be used to identify you (the client, "you", "your"). If you have any questions or concerns about how your personal data is being used, you can contact APL's Data Protection Officer (DPO) by letter at Hurley House, 1 Dewsbury Road, Leeds, LS11 5DQ or by emailing Dpo@aplawyers.co.uk.

Where APL is acting for two or more people in a transaction, this privacy notice applies to each person separately. Where we are not acting directly for the registered proprietor, for example an executor or an attorney, this notice will apply both equally to all lawful representatives who have instructed us and the individuals named on the title.

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, SMS etc.

The types of personal data we collect and use

Whether or not you become a customer of APL we may use your personal data for the reasons set out below. If you become a customer APL will use it to either provide the conveyancing services to you or to fulfil our contract with you. APL will collect most of the data directly 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, work and personal email addresses, home, work and mobile telephone numbers);
- IP address/location
- Date of birth (for identity purposes and to ensure you are of an age to purchase a property in the UK);

- National Insurance Number and Passport number for identity and Land Tax obligations
- Financial details (e.g. sources of income, evidence of source and proof of funds and details of banks accounts held by you);
- Records of the services you have obtained or applied for, how you use them and the relevant technology used to access or manage them (e.g. mobile phone location data, IP address, MAC address);
- Biometric data (e.g. voice recording for voice recognition);
- Information from fraud prevention agencies, 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 transaction (e.g. number of adult occupiers);
- Employment details/employment status for anti-money laundering and fraud prevention purposes;
- Personal data about others. You must have their authority to provide their personal data to APL and share this privacy notice with them beforehand.
- 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).

Providing your personal data

We will tell you if providing some personal data is optional, including asking for your consent to process it. In all other cases you must provide your personal data to enable APL to provide services to you.

Monitoring of communications

Subject to applicable laws, APL may monitor and record your calls, emails, text messages, social media messages and other communications in relation to your dealings with us. APL will do this for regulatory compliance, 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. APL also monitors activities on your file where necessary for these reasons and this is justified by APL's legitimate interests and legal obligations.

Using your personal data: the legal basis and purposes

APL processes your personal data for the following reasons:

1. As necessary to perform its contract with you for the relevant conveyancing transaction:

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

e) To trace your whereabouts and to contact you about any post completion matters that may arise and to recover debt or return monies to you.

2. As necessary for APL'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 case; 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 on your conveyancing file.

5. Based on your consent, for example:

a) When you request APL 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 APL process any special categories of personal data about you at your request (e.g. biometric data, data concerning your health); and

c) To send you marketing communications where we have asked for your consent to do so, please note that you are free at any time to change your mind and withdraw your consent. The consequence might be that we cannot do certain things for you.

You must provide your personal data to enable APL to carry out the conveyancing transaction. APL will tell you if providing some personal data is optional, including asking for your consent to process it in all other cases.

Sharing of your personal data

Subject to applicable data protection laws we may share your data with:

- The Simplify group of companies of which APL is a member of. Simplify provides services to APL including the provision of staff, office premises, desks, computers and IT support and so has access to all of the personal data you provide us;
- APL's group of companies which means our subsidiaries, our ultimate holding company and its subsidiaries;
- Sub-contractors and other persons who help us provide the conveyancing transaction;
- Companies and other persons or agencies providing services to us including but not limited to electronic and facial recognition ID verification and bank/funding validation providers;

- Our legal and other professional advisors, including our auditors and our professional indemnity insurer;
- Fraud prevention agencies, credit reference agencies and debt collection agencies when you instruct us to act, and periodically during the conveyancing transaction;
- Government bodies and agencies in the UK and overseas (e.g. HMRC and Welsh Revenue Authority, who may in turn share it with relevant overseas tax authorities), the Land Registry, and with our regulators (e.g. The Council for Licensed Conveyancers and the Information Commissioner's Office);
- Courts, to comply with legal requirements, and for the administration of justice;
- In an emergency or to otherwise protect vital interests;
- To protect the security or integrity of our business operations;
- To other parties connected with your conveyancing transaction, including but not limited to: Lenders, Restriction and Charge Holders, Help To Buy agents, Estate Agents, Brokers, other side legal representatives;
- To the introducer who introduced your case to APL;
- To Lender Panels who manage conveyancing cases on behalf of your Lender (if applicable);
- 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 you use our website (analytics)

You can visit our website without giving away your personal information. APL 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 or bank details. We use cookies to profile some of the data we collect to enable us to test and analyse how audiences interact with the APL website and to make informed decisions about how to provide a better experience for visitors to our website.

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.

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 be also transferred to, or processed in, a destination outside the UK. We have operations centres 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 Dpo@aplawyers.co.uk.

Identity verification and fraud prevention checks

The personal data we have collected from you will be shared with fraud prevention agencies who will use it to prevent fraud and money laundering and to verify your identity. If fraud is detected, you could be refused certain services, finance or employment in the future. Further details of how your information will be used by us and these fraud prevention agencies, and your data protection rights, can be obtained by emailing Dpo@aplawyers.co.uk.

Credit Reference Agencies

In order to process your transaction and comply with our legal obligations, APL perform identity checks on you through credit reference agencies. To do this, APL supply your

personal data to the credit reference agency and they will give APL information about you. The credit reference agencies may check the details against any databases (public or otherwise) to which they have access. They may also use your personal details in the future to assist other companies for verification purposes. A record of the search will be retained by both us and the credit reference agencies. This has no effect on your credit score, and lenders are unable to see this. Further details of how your information will be used by APL and the credit reference agencies can be obtained by emailing Dpo@aplawyers.co.uk.

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.

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 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 Dpo@aplawyers.co.uk.

Links to websites of other providers third parties

Please note that this data privacy policy only applies to APL 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.

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, we 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.

Criteria used to determine retention periods

The following criteria are used to determine data retention periods for your personal data, whether you instruct APL or not:

- Retention in accordance with legal and regulatory requirements: APL will retain your personal data after completion of your conveyancing transaction based on APL's legal and regulatory requirements.
- Retention in case of claims: APL will retain your personal data for as long as you may bring a legal claim.
- Retention in case of queries: APL will retain your personal data for as long as we are legally able to do so to enable us to deal with any queries you may have in relation to the conveyancing transaction or quote.

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.

Your responsibility

It is your responsibility to ensure that your computer is virus protected. We accept no responsibility for any loss you may suffer as a result of accessing and downloading information from this site.

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:

Data Protection Officer

Advantage Property Lawyers Limited

Hurley House 1 Dewsbury Road, Leeds LS11 5DQ

Dpo@aplawyers.co.uk

Data Anonymisation and aggregation

Your personal data may be converted into statistical or aggregated data which cannot be used to identify you, then used to produce statistical research and reports. This aggregated data may be shared and used in all the ways described above.

Group Companies

For more information on the Simplify group companies, please contact Dpo@aplawyers.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:

Data Protection Officer

Advantage Property Lawyers Limited

Hurley House 1 Dewsbury Road, Leeds LS11 5DQ

Dpo@aplawyers.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. APL 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