

## **Integrar Privacy Policy**

### **Welcome to the Privacy Policy (“the Privacy Policy”) for Integrar.**

Integrar respects your privacy and is committed to protecting your personal data. In the course of our acting for you, we may receive information relating to you, as an individual or as director, shareholder, partner, employee or representative of a company or organisation. This Privacy Policy sets out the basis of which we will process this personal data.

#### **Who we are**

Integrar is a trading name of Knights Professional Services Limited. We are a company registered in England and Wales under company number 08453370 and our registered office is at The Brampton, Newcastle-under-Lyme, Staffordshire ST5 0QW. We act as either a data controller or data processor dependent on how we receive your data. If you provide personal data to us directly, we will normally be the data controller. If you have provided personal data to a third party such as your mortgage lender, bank, building society, mortgage broker, estate agent or financial advisor and that has been shared with us, we will be the data processor.

Although we are not obliged by law to appoint a Data Protection Officer, we have appointed a Data Privacy Manager (DPM) who is responsible for overseeing questions in relation to this Website Policy. If you have any questions about this Client Policy, including any requests to exercise your legal rights, please contact the DPM using the details set out below.

#### **Our contact details:**

Full name of legal entity: Knights Professional Services Limited.

Our main trading address is also The Brampton, Newcastle-under-Lyme, Staffordshire ST5 0QW. Our vat registration number is 208 8271 04.

Email address: [customerservicesmanager@integrar.services](mailto:customerservicesmanager@integrar.services).

We are authorised and regulated by the Solicitors Regulatory Authority. Our SRA number is 620595.

Email address: [customerservicesmanager@integrar.services](mailto:customerservicesmanager@integrar.services).

If you are based in the European Economic Area (EEA) and you have any questions about this Client Policy, including any requests to exercise your legal rights, you can contact our European Representative through the following channels:

Postal address: The DPO Centre Europe Ltd, Alexandra House, 3 Ballsbridge Park, Dublin, D04C 7H2

Phone number: +353 1 631 9460

Email address: [advice@dpocentre.com](mailto:advice@dpocentre.com)

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), which is the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). Knights is registered with the ICO, registration number ZA112722. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## **Changes to the Privacy Policy and your duty to inform us of changes**

We may need to update this Privacy Policy from time to time. If the change is material, we will place a prominent notice on our website or update you by other appropriate means, contacting you at the details you have provided to us in your last correspondence.

It is important that the personal data we hold about you is accurate and up to date. We may ask you to confirm updates to your personal data from time to time but please keep us informed if your personal data changes during your relationship with us in the meantime. Please inform the DPM of any changes in your data at the following email address: [customerservicesmanager@integrar.services](mailto:customerservicesmanager@integrar.services)

## The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the person's identity has been removed (Anonymous Data).

We may collect, use, store and transfer different kinds of personal data as necessary to enable us to carry out your instructions, to manage and operate our business and to comply with our legal and regulatory obligations. We have grouped together the personal data into different types below:

- Identity data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, gender and photographs, copies of passport, national identity card, driving licence, utility bills, and other similar documents.
- Contact data includes postal address, email address and telephone numbers.
- Professional data includes academic qualifications and achievements, references, profession, job title, employer and professional history of these things, immigration status and work permits.
- Welfare data includes grievance and disciplinary information, information relating to criminal convictions and allegations of criminal activity, medical records and information including dietary requirements and religious information.
- Financial data includes bank account, payment card details and pension details.
- Transaction data includes details about payments to and from you and other details of services you have purchased from us.
- Technical data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website, data from building access controls, information we obtain from our IT and communications monitoring.

- Profile data includes your username and password to any Knights online service, your interests, preferences, feedback and survey responses.
- Usage data includes information about how you use our website and services.
- Marketing and communications data includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- Other personal data contained in correspondence and documents which you or others on your behalf or in connection with your matter may provide to us.

## **Special Category Data**

We may collect Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Much of this information is provided by way of Welfare Data. We may also collect information about criminal convictions and offences. Further legal controls apply to data relating to criminal convictions and allegations of criminal activity. All such information is collected in accordance with this Privacy Policy. We have in place appropriate policy documents and/or other safeguards which we are required by law to maintain when processing such data.

We may also receive Special Categories of Personal Data about you from your bank, building society, mortgage broker, estate agent or financial advisor. In these circumstances, we rely on the data controller establishing a legal basis for processing your Special Categories of Personal Data and for sharing it with us.

## **Data relating to criminal convictions and offences**

We may collect and store personal data relating to criminal convictions and offences (including the alleged commission of offences) only where necessary for the purposes of the prevention or detection of an unlawful act and is necessary for reasons of substantial public interest; providing or obtaining legal advice; and establishing, exercising or defending legal rights.

## **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have, or are trying to enter into, with you (for example, to provide you with services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

## **How is your personal data collected?**

We use different methods to collect data from and about you. You may give us your personal data by completing information on the Integrar Portal, filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- enter into a contract with us;
- make a payment to us for events or services;
- subscribe to our services or publications;
- request marketing to be sent to you;
- attend a networking event;
- complete a survey; and
- provide us with feedback.

We collect most of the personal data directly from you. However, we also collect and process personal data about you which we have received from:

- third parties, such as your mortgage lender, bank, building society, mortgage broker, estate agent or financial advisor in order to provide remortgage services;

- third parties where they are a party to or otherwise concerned in a matter on which we are acting for you;
- public sources, such as Companies House, Land Registry, the Electoral Register, 192.com, DueDil and MarketIQ;
- analytics providers or search information providers as a result of visiting our website; and
- our IT systems, such as practice management systems or building access controls and reception logs.

## **Automated technologies or interactions**

As you interact with our website and portal, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites or portals employing our cookies. Please see our [\[Link to relevant Website Cookie policy\]](#) for further details.

## **How we use your personal data**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- where we need to perform the contract we are about to enter into or have entered into with you or our clients;
- where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests;
- where we need to comply with a legal or regulatory obligation; and
- where this is necessary to protect your vital interests, or someone else's vital interests this is typically in an emergency.

Generally, we do not rely on consent as a legal basis for processing your personal data other than we may send third party direct marketing communications to you by email or text message. You have the right to withdraw consent to marketing at any time by contacting us at [customerservicesmanager@integrar.services](mailto:customerservicesmanager@integrar.services).

## **Purposes for which we will use your personal data**

Set out in the table below is a description of all the ways we plan to use your personal data, and the legal basis upon which we rely to do so. Where it is appropriate, we have also identified what our legitimate interests are.

Where we rely on “legitimate interests” as a basis for using your personal data, we have carried out an assessment to ensure that we have weighed your interests, rights and freedoms and any risk posed to you against our own interests, ensuring that they are proportionate and appropriate. If you wish further information about this assessment, please contact our DPM at [customerservicesmanager@integrar.services](mailto:customerservicesmanager@integrar.services). There may be more than one legal basis for us processing your data depending on the specific particular purpose for which we are doing so. Please contact us at [customerservicesmanager@integrar.services](mailto:customerservicesmanager@integrar.services) if you need details about the specific legal basis upon which we are relying to process your personal data where more than one ground is set out in the table below.

<b>Purpose for which we will process the information</b>	<b>Lawful Basis for processing including basis of legitimate interest</b>	<b>Third party processing</b>
Registering you on our website and portal	For the performance of a contract with you; on the basis of your consent	Third party IT, practice management systems, and communications service providers

To carry out checks to identify our clients and verify their identity; To verify source of funds; Screening for financial and other sanctions or embargoes; Other processing necessary

To comply with our legal and regulatory obligations

Third party identity checking companies

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to comply with

professional, legal and regulatory obligations that apply to our business.

Providing services to mortgage lender clients

On the basis of your consent; necessary to provide our service to mortgage lender clients to assist in remortgage; client has established a legal basis for processing personal data

Third party IT, practice management systems, online data room hosting providers, and communications service providers

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To provide legal professional services to you in connection with your matters

For the performance of our contracts with you or to take steps at your request before entering into a contract

Third party IT, practice management systems, online data room hosting providers, and communications service providers

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To carry out associated administration and accounting in relation

For the performance of our contract with you or to take steps at your request before

Third party accounting systems, practice management systems payroll and marketing preference



with your matters,  
including:

entering into a  
contract

management service  
providers

(a) carry out credit  
reference checks

To comply with  
professional, legal and  
regulatory obligations

(b) manage  
payments, fees and  
charges

For our legitimate  
interests (to carry out  
credit control and to  
ensure that our clients  
are likely to be able to  
pay for our services as  
well as recover debts  
due to us). We  
consider this use to be  
proportionate and not  
prejudicial or  
detrimental to you.

(c) collect and recover  
money owed to us

(d) provide catering

It is in our legitimate  
interests to provide  
catering to you and to  
provide dietary  
requirements (to  
develop and grow our  
business and for your  
safety). We consider  
this use to be  
proportionate and not  
prejudicial or  
detrimental to you; On  
the basis of your  
consent.

Third party catering  
companies

To manage our relationship with you which will include:

(a) Complying with our internal business policies and procedures

(b) Updating client records

(c) Notifying you about changes to our terms or privacy policy

(d) Asking you to leave a review, provide feedback or take a survey

For the performance of our contract with you or to take steps at your request before

entering into a contract; To comply with our legal and regulatory obligations; For our legitimate interests (to keep our records updated and to study how customers use our services)

Third party practice management and communication service providers

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To market our services to you, including:

(a) provide updates or newsletters

(b) invite you to events or functions

(c) make suggestions and recommendations to you about services that may be of interest to you.

It is in our legitimate interests to market our services (to develop our services and grow our business). We consider this use to be proportionate and not prejudicial or detrimental to you.

Third party marketing preferences managers, data analysts and communication service providers

To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)

It is in our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise). We consider this use to be proportionate and not prejudicial or detrimental to you; To comply with a legal obligation.

Third party IT, hosting, archive, practice management, communications, payroll and marketing preference management service providers

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To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you

It is necessary for our legitimate interests (to study how clients use our services, to develop them, to grow our business and to inform our marketing strategy). We consider this use to be proportionate and not prejudicial or detrimental to you.

Third party IT, communications and marketing preference management service providers

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To use data analytics to improve our website, services, marketing, client relationships and experiences

It is necessary for our legitimate interests (to define types of users of our events and services, to keep our website updated and relevant, to develop our organisation).

Third party IT, data analytics and marketing preference management service providers

## Marketing

Integrar strives to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

- we may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you;
- you will receive marketing communications from us if you have requested information from us, or purchased services from us and, in each case, you have not opted out of receiving that marketing;
- for email marketing to an individual subscriber (i.e. a non-corporate email address) with whom we have no pre-existing relationship, we will need your consent to send you unsolicited email marketing;
- we will get your express opt-in consent before we share your personal data with any company outside the Knights Group for marketing purposes; and
- where you provide consent, you can ask us - or third parties - to stop sending you marketing messages at any time by unsubscribing or updating your preferences below; following the opt-out links on any marketing message sent to you; or contacting our DPM ([customerservicesmanager@integrar.services](mailto:customerservicesmanager@integrar.services)) at any time. Please note that where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service purchase or other transactions.

## **Cookies**

You can set your browser to refuse some, or all, browser cookies, or to alert you when websites or portals set or access cookies. If you disable or refuse cookies, please note that some parts of our website or portal may become inaccessible or not function properly. For more information about how to manage the use of cookies, please see our Cookie Policy.

## **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you would like an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at [customerservicesmanager@integrar.services](mailto:customerservicesmanager@integrar.services) If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **Disclosures of your personal data**

We do not share or disclose any of your personal information without your consent, other than for the purposes specified in this Privacy Policy; where there is a legal requirement; or it is necessary in order to protect the vital interests of a person. We may have to share your personal data with the parties set out below for the purposes set out in the table above.

**Internal Third Parties** as set out in the Glossary below

**External Third Parties** as set out in the Glossary below.

We require all third parties to respect the security and confidentiality of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **International transfers**

We do not do not transfer your personal data outside the European Economic Area (**EEA**) without your consent. Please contact us at [customerservicesmanager@integrar.services](mailto:customerservicesmanager@integrar.services) if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

## Data security

We have appropriate security measures in place to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

Integrar cannot guarantee the security of information transmitted over the internet or that unauthorised persons will not obtain access to personal data. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach.

## Data retention

We will only retain your personal data for as long as is necessary to fulfil the purpose(s) for which we collected and processed it, including for the purposes of satisfying any legal, accounting, or reporting requirements.

In determining the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy a copy of which you can request from us by contacting us at [customerservicesmanager@integrar.services](mailto:customerservicesmanager@integrar.services), Due to legal and regulatory requirements, we may need to retain personal data for up to seven years after we cease providing services and products to you, where necessary, to comply with our legal obligations, resolve disputes or enforce our terms and conditions.

In some circumstances, you can ask us to delete your data: see request erasure of your personal data below for further information.

In some circumstances, we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the right to:

**Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are processing it lawfully.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. You may ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. There may be specific legal reasons why we cannot comply with your request of erasure. If there are, we will notify you at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the accuracy of the data; (b) where our use of the data is unlawful but you do

not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. This right only applies to automated information for which you initially provided consent to us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

### **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### **What we may require from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information about your request so that we may speed up our response.

### **Time limit to respond**



We try to respond to all legitimate requests within one month. Occasionally, it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## Glossary

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure that we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us at [customerservicesmanager@integrar.services](mailto:customerservicesmanager@integrar.services).

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

**The Knights Group means Knights Group Holdings plc** which includes Knights Professional Services Limited and any of its current direct or indirect subsidiaries and/or controlled affiliates as well as any successors to Knights Professional Services Limited and any of its direct or indirect subsidiaries and/or controlled affiliates.

### **Internal Third Parties means:**

- Knights Group partners, staff and consultants based in the UK.
- Other companies in the Knights Group

### **External Third Parties means:**

- Mortgage lender, bank, building society, mortgage broker, estate agent or financial advisor who we provide services to and who share with us personal data relating to their customers in order for us to perform our contact, provide services to them and provide remortgage services to their customers.
- Service providers acting as processors who provide IT, online data room hosting or website and system administration services.
- Suppliers based in the UK providing marketing services to us, or with whom we are conducting joint marketing exercises.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance, pension and accounting services.
- Our professional indemnity insurers or brokers, and our auditors, or risk managers who we or they may appoint.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the UK who require reporting of processing activities in certain circumstances.
- Public authorities or education providers acting as processors or joint controllers based in the UK who provide confirmation of qualifications or educational achievements.
- Third parties to whom we choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.
- Any other disclosure which we, acting in good faith, consider disclosure to be required by law or the rules of any applicable governmental, regulatory or professional body.