



### **InfoTrack Limited - Privacy Policy**

This Privacy Policy relates to the business operated in the United Kingdom by InfoTrack Limited (“**InfoTrack**” or “**we**”, “**our**” or “**us**”) a company registered in England with company number 09474590 and whose registered office is at 10 John Street, London, United Kingdom, WC1N 2EB. InfoTrack is committed to the protection of privacy in accordance with all applicable laws (including (without limitation) the General Data Protection Regulation when it is brought into force). This Privacy Policy sets out how we treat the personal information and personal data that we collect from you or that you provide to us (including our procedures regarding the handling of personal information and data, including collection, use, disclosure and storage of information, as well as your rights to access and correct that information).

InfoTrack may collect personal information and data from you in order to provide our services and to meet our legal obligations. By using our website ([www.infotrack.co.uk](http://www.infotrack.co.uk)) (“**Our Website**”) or ordering our Services (e.g. via Our Website, our Ordering and Delivery System by telephone or by email) (“**Ordering Methods**”), or by providing any personal information to us, you are accepting and consenting to the collection, use and disclosure of your personal information as set out in this Privacy Policy.

In this Privacy Policy the following words shall have the following meanings:

“Consumer” means any person acting for purposes other than their trade, business or profession.

“Service(s)” means the supply of services by InfoTrack to you including but not limited to property searches, reports and photographs, company searches, trade marks and domain names searches and other searches from time to time and includes our instructions to a Supplier, on your behalf and the dissemination of the information subsequently provided by the Suppliers.

“Supplier” means any organisation or third party who provides data or information of any form to InfoTrack for the purposes of providing the Services.



### 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 you may give us when you place an order via Our Website (or other Ordering Methods) or contact our customer service team, or otherwise interact with us and provide personal data about:

- in the case of a Consumer, you personally;
- in the case of a Supplier, your employees (and prospective employees and contractors), your clients, business associates and potential clients and their employees.
- in the case of prospective employees and contractors, you personally.

Personal information that you give us 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;
- in the case of a Supplier, 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.

In the case of a Supplier if you provide to us, and we collect from you, personal information or personal data of a third party, it is your responsibility to ensure that the third party is provided with a copy of this Privacy Policy.

### 2. How personal information is collected and held by us

We collect the personal information you provide 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 telephone, email or in other ways;
- enter personal information into our system about you or other third parties 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;
- when you contact us as a prospective employee or contractor of InfoTrack.



When you visit Our Website, we may collect any or all of the following technical data:

- Device Identifiers (the internet protocol address used to connect your device to the internet, your log-in information, browser type and version, regional settings, operating system and platform);
- Data about your use of Our Website (the full Uniform Resource Locators (URL), clickstream to, through and from Our Website (including date and time), products you viewed or searches for, time spent on certain pages or screens, interaction data (such as scrolling, clicks and mouse-overs).

### 3. How InfoTrack protects personal data

InfoTrack employ a variety of physical and technical measures to keep personal data safe to prevent unauthorised access to, use or disclosure of it. Electronic data and databases are stored on secure computer systems and we control who has access to them (using both physical and electronic means).

Our staff receive data protection training and we have a set of detailed data protection policies and procedures which personnel are required to follow when handling personal data.

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.

### 4. 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 with your consent or where it is necessary in order to:

- enter into, or perform, a contract with you e.g. to fulfil any orders you place through Our Website or over the telephone;
- perform the services you have asked us to provide;
- comply with a legal duty;
- protect your vital interests;
- remember your preferences (e.g. where you are a Supplier, if you ask not to receive marketing material, we'll keep a record of this), or
- for our own (or a third party's) lawful interests, provided your rights don't override these.

For the purposes connected with providing our products and services to you, we may share your data with third parties but we will not use or share your personal information for any other purpose without first obtaining your consent, unless required by law.

In any event we will only use your personal data for the purposes for which it is collected, or purposes which are very similar.

Except as otherwise specified in this Privacy Policy, we use personal information that you provide for the following purposes:

- to set up your account with us, which (where you are a Consumer) 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;
- 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 or this Privacy Policy.

We may disclose your personal information (or the personal information of third parties that you may provide to us) to 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.

We may share your personal information within the InfoTrack Group of Companies, including InfoTrack, STL Group Limited, and Perfect Portal (UK) Limited in connection with the fulfilment of the contract between us only.

You can withdraw your consent at any time to our processing of your personal data for any purpose at any time, by contacting us by email or at the postal address set out in paragraph 8.

## 5. Marketing

Where you are a Supplier, and as an existing customer, we may wish to send you details regarding:

- new services and products offered by us;
- details of meetings, events and seminars that may be of interest to InfoTrack customers and clients;
- our newsletters and other marketing publications.

We may contact you inviting you to opt-in to receiving this information. This means that you will be given the choice as to whether you want to receive these messages and will be able to select how you want to receive them (email, telephone or post).

You may opt-out of receiving direct marketing or the disclosure your personal information for the purpose of direct marketing by:

- contacting our Data Privacy Officer at [DPO@infotrack.co.uk](mailto:DPO@infotrack.co.uk);
- by using any unsubscribe facility contained in email communications that you receive from us;
- writing to us at InfoTrack Limited, Level 11, 91 Waterloo Road, London, SE1 8RT.

The information we hold is never used for marketing purposes and is never marketed, rented or sold to any third parties.



### 6. Where we store your personal information

The data that we collect from you will be transferred, stored and processed using Amazon Web Servers (AWS) which are held at a destination within the European Economic Area (“EEA”). AWS servers offer the highest level of security and are ISO 27001 compliant. If we transfer any data outside the EEA we will take steps to make sure adequate levels of privacy protection, in line with UK Data Protection legislation, are in place.

The data we collect will be stored and kept for as long as is necessary.

If you wish to opt out of communications from us or withdraw your consent, your data will be deleted without undue delay. We continually review the personal data we hold and delete what is no longer required.

### 7. How you can access your personal information

We want to ensure you remain in control of your personal data. Part of this is making sure you understand your legal rights which are as follows:

- the right to erasure of personal information (although this will not apply where it is necessary for us to continue to use the data for a lawful reason);
- the right to have inaccurate data rectified;
- the right to object to your data being used for marketing or profiling;
- where technically feasible, you have the right to see any personal data you have provided to us which we process automatically on the basis of your consent to a performance of a contract. This information will be provided in a common electronic format;
- the right to make a subject access request (“**SAR**”) at any time to find out more about the personal data which InfoTrack holds about you (and obtain a copy of it). InfoTrack will usually respond to SAR’s within one month of receipt (however this may be extended by up to two months in the case of complex and/or numerous requests, and in such cases you shall be informed of the need for the extension).

If you would like further information on your rights or you wish to exercise them please write to us at [DPO@infotrack.co.uk](mailto:DPO@infotrack.co.uk) or InfoTrack Limited, Level 11, 91 Waterloo Road, London SE1 8RT.

Please bear in mind that there are exceptions to the rights above and, though we will always try to respond to your satisfaction, there may be situations where we are unable to do so. If you are not happy with our response, or you believe that your data protection or privacy rights have been infringed, you should contact the UK Information Commissioner’s Office, which oversees data protection compliance in the UK. Details of how to do this can be found at [www.ico.org.uk](http://www.ico.org.uk)

### 8. How to contact us or make a complaint

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

Lloyd Smith – InfoTrack  
Data Privacy Officer  
[DPO@infotrack.co.uk](mailto:DPO@infotrack.co.uk)

Writing to us at:

InfoTrack Limited, Level 11, 91 Waterloo Road, London SE1 8RT.

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.

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.

### 9. 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.