Privacy Policy (SDL Surveying)

SDL Surveying respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

Important information and who we are

The entity that will be the controller for your data will, in most circumstances, be the entity that you purchase a product or service from or that you otherwise deal with. SDL Surveying Limited is the controller and responsible for this website.

This privacy policy is issued on behalf of SDL Surveying so when we mention SDL, we, us or our in this privacy policy we are referring to the company responsible for processing your personal data.

We have appointed Head of Compliance who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact our head of compliance using the details set out below.

Contact details

If you have any questions about this privacy policy or our privacy practices, please contact our head of compliance in the following ways:

Email address: compliance@sdlsurveying.co.uk.

Postal address: 3-4 Regan Way, Chetwynd Business Park, Chilwell, Nottingham, NG9 6RZ

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

The data we collect about you

Personal data means any data about an individual from which that person can be identified or is identifiable.

We may collect, use, store and transfer different kinds of personal data about you:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.

- **Contact Data** includes billing address, home address, email address and telephone numbers.
- **Application data (to apply to become an Authorised Representative)** includes information about your business.
- **Call recording data** includes an audio recording of any calls you make to us.
- **Online communication** includes transcript of discussion.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you, arrears information and other details of products and services we have arranged for you.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting, location, preferred language, browser plug-in types and versions, device type (unique device identifiers), operating system and platform, device screen resolution, calling line identification (CLI) information, and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, products we have arranged for you, your interests, preferences, feedback, complaints and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity.

How is your personal data collected

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your personal data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
    - apply for our products or services;
    - apply to become an Authorised Representative (where applicable);
    - create an account on our websites or client sites;
    - subscribe to our service or publications;
    - request marketing to be sent to you;

- send a message to our support system;
- enter a competition, promotion or survey; or
- give us feedback or contact us.

- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data and Usage Data. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive data about you if you visit other websites employing our cookies. Please see our cookie policy https://sdlsurveying.co.uk/cookie-policy/ for further details.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below:
  - Authorised Representatives within our network;
  - marketplace providers;
  - analytics providers such as Google Analytics;
  - advertising networks;
  - search information providers such as Google;
  - providers of technical, payment and delivery services;
  - lenders for fraud prevention purposes;
  - credit reference agencies such as Experian;
  - publicly available sources such as Companies House and the Electoral Register.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the lawful bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

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 our 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.

Note that we may process your personal data for more than one lawful basis depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific lawful

basis, we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	**Lawful basis for processing including basis of legitimate interest**
To register you as a new customer	Performance of a contract with you
To register you as an Authorised Representative (where applicable)	Performance of a contract with you
To review and process your application and provide you with advice	Performance of a contract with you
To process and deliver our services to you including: • Manage payments, fees and charges • Collect and recover money owed to us	Performance of a contract with you (Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include notifying you about changes to our terms and dealing with enquiries, requests and complaints	Performance of a contract with you Necessary to comply with a legal obligation Necessary for our legitimate interests (to keep our records updated)
To provide services to Authorised Representatives and to record advice given by Authorised Representatives under our authorisation	Performance of a contract Necessary to comply with a legal obligation Necessary for our legitimate interests (to keep records)
To update other parties in a mortgage transaction (e.g. estate agents or solicitors)	Consent Necessary for our legitimate interests (to keep other parties up to date)
To audit and analyse market risks, market trends and other management information	Necessary for our legitimate interests (to operate our business effectively)

To ask you to partake in a prize draw, competition or complete a survey	Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To enable you to partake in a prize draw, competition or complete a survey	Performance of a contract with you Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Necessary for 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) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To assist with the training and monitoring of our staff	Necessary for our legitimate interests (to ensure we provide you with a good service)
To make suggestions and recommendations to you about services that may be of interest to you	Necessary for our legitimate interests (to develop our products/services and grow our business)
To send marketing communications to you by email, post and SMS about our services or the services of other companies within our group and, where we can do so compliantly, about third parties	consent legitimate interested (to develop our products/ services and grow our business)
For training and quality purposes	Legitimate interests (to ensure the quality of our services)

To comply with our legal and regulatory obligations (such as our RICS & FCA obligations), including around fraud prevention and anti-money laundering	Compliance with a legal obligation
For training and quality purposes	Legitimate interests (to ensure the quality of our services)

Special Category Data

We may also process special category data relating to you, including where we need to know information about your health in order to make an application on your behalf or to purchase a product (or where that is done by an Authorised Representative under our authorisation). Where we process special category data, our special category conditions will be:

- Necessary for reasons of substantial public interest; or
- Necessary for the establishment, exercise or defence of legal claims.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see https://sdlsurveying.co.uk/cookie-policy/

Disclosures of your data

We may share your personal data with the following third parties for the purposes set out in the table above:

- providers of IT and system administration services (including website provider);
- providers of finance services;
- email archiving providers;
- providers of data verification services;
- providers of payment services such as Verifone;
- professional advisers and service providers including lawyers, bankers, lenders, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services;
- other brokers or authorised representatives within our network;
- ID checking services (such as Experian);
- Other parties in a mortgage transaction- including estate agents and solicitors;

- providers of survey software and services such as Surveyhub (Etech) and Quest;
- Third parties to whom we may 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 policy;
- HM Revenue & Customs, regulators, ombudsman and other authorities who require reporting of processing activities in certain circumstances;
- Police and law enforcement authorities and bodies; and
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements or to protect the rights, property, or safety of our customers, our regulator, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection, prevention of money laundering and credit risk reduction.

We will also share your data with the other companies within the SDL Surveying Group for the purposes set out above, where relevant.

We may also share data with other affiliated companies (not within the SDL Surveying Group) for the purposes set out above, where relevant. We will usually check with you before doing so.

International transfers

We may transfer your personal data outside the UK. Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, we will use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

Data security

We have put in place appropriate security measures 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.

It is your responsibility to ensure that you do not give out your log in details to any other person, and to ensure that you log out of our website and delete browser history before logging off if you are using a shared computer.

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 where we are legally required to do so.

Email is not always a secure mode of communication, and we provide no guarantee that confidentiality of the information provided in an email will be maintained during transmission.

We will never send you an email asking you to transfer deposit funds. If you ever receive an email from us which provides bank account details for you to transfer money, please speak to us on our main line number to confirm it is genuine.

If you choose, or you are provided with, a user identification code, password or any other piece of information as part of our security procedures, you must treat such information as confidential. You must not disclose it to any third party.

Data retention

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine 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, regulatory, tax, accounting or other requirements.

In some circumstances we will 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** - this enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

- **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** - this enables you to 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. Note,

however, that we may not always be able to comply with your request of erasure, for specific legal reasons which will be notified to you, if applicable, 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. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which overrides your rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes.

- **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:

    - If you want us to establish the data's accuracy.

    - Where our use of the data is unlawful, but you do not want us to erase it.

    - Where you need us to hold the data even if we no longer require it, such as if you need it to establish, exercise or defend legal claims.

    - 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. Note that this right only applies to personal data which we process electronically, which you initially provided consent for 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 services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us using the contact details above.

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you **or** by contacting us at any time.

Third-Party Advertising

Third parties may advertise on our website. In doing so, those parties, their agents or other companies working for them may use technology that automatically collects your IP address when they send an advertisement that appears on our site to your browser. They may also use other technology such as cookies or JavaScript to personalise the content of, and to measure the performance of their adverts. We do not have control over these technologies or the data that these parties obtain. Accordingly, this privacy notice does not cover the information practices of these third parties. Please see our cookie policy https://sdlsurveying.co.uk/cookie-policy/ for more information.

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. This version was last updated on 06.08.2025.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.