

Privacy Notice

SCOPE

We, NotarySign Limited, Company number 14054897, ICO Registration number ZB371541, whose registered office is at Conker Cottage, High Street, Haversham, Milton Keynes, MK19 7DT (also referred to as “we”, “us”, “our” and “ours”), are committed to maintaining the privacy and confidentiality of information held about you. This privacy notice describes our views and practices with regard to our processing of personal data of our members, individuals who contact us or who use our webpages, content or services (each a “user”, “you”, “your” and “yours”). By visiting our webpages and/or using our services, you acknowledge the processing described in this privacy notice, our Terms and Conditions and related documents. Please read these documents carefully.

FEEDBACK

We welcome comments about this privacy notice. If you have any questions about this privacy notice you may contact us by emailing admin@notarysign.uk or by writing to: NotarySign Limited, Conker Cottage, High Street, Haversham, Milton Keynes, MK19 7DT

NOTIFICATION OF CHANGES TO PRIVACY NOTICE

We are continually improving our methods of communication and adding new functionality and features to our webpages and to our existing services. Because of these ongoing changes, changes in the law and the changing nature of technology, our data protection practices will change from time to time. If and when our data practices change, we will notify you by posting an updated privacy notice on our webpages or otherwise. Your continued use of the webpages, content or services or your continued dealing with us after notifying such changes will amount to your acknowledgement of the amended privacy notice. We encourage you to check this page frequently. Last updated in September 2022.

WHAT ARE PERSONAL DATA?

“Personal data” means any information relating to an identified or identifiable natural person, known as ‘data subject’, who can be identified directly or indirectly; it may include name, address, email address, phone number, IP address, location data, cookies, a recording of your call with us and similar information. It may also include “special categories of personal data” such as racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a data subject, data concerning health or data concerning a natural person’s sex life or sexual orientation. For the purposes of this privacy notice references to ‘personal data’ include ‘special categories of personal data’ as appropriate.

COLLECTION OF YOUR PERSONAL DATA

- When you contact us, we may request personal information about you such as your name, postal address, email address and telephone number. Or you

may complete a form on our webpages or subscribe to our services.

- We sometimes supplement that information with information that is received from third parties. For instance, if inaccurate postal codes are received, we may use third party software to fix them.
- You may also provide to us personal data relating to third parties, such as people who you work with or your own clients. Information about third parties should only be provided if you have demonstrable permission to do so or if the information is available in the public domain. Such information must be adequate, relevant and not excessive for the purposes for which it is being provided.
- With regard to each visit to our webpages we may collect technical information about your device such as IP address, operating system, browser, time zone setting, the Internet address of the website from which you linked directly to our webpages, URL clickstream data, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page. This technology does not directly identify you and it enables us to compile statistics about our users and their use of our website, content and services.
- Our webpages may contain hyperlinks to other pages on the Notaries Society website or to pages on the websites of other companies that are associated with our services. We may use technology to track how often these links are used and which pages the webpages our visitors choose to view. Again, this technology does not directly identify you and enables us to compile statistics about the use of these hyperlinks.
- Generally, you are under no obligation to provide this information, but without it, we may be unable to provide you with some of our content and services.
- We will rely on the information provided by you as accurate, complete and up to date and you agree to ensure that this will be the case.
- We will collect usage data from DocuSign (including usage data in relation to the use of IDNow QES services) which will include personal information.
- We provide services to you by providing access to our DocuSign account which in turn provides integrated access to IDNow as a QES provider. DocuSign and IDNow will collect the personal data input by you into their systems. Please refer to their relevant terms and conditions and privacy notices for details of the data that they will collect and the uses that will be made of that data.

USE OF PERSONAL DATA

We will only process personal data, in accordance with applicable law, for the following purposes:

- (a) responding to your queries, requests and other communications, for example, if you send us a query about our webpages, content or services;
- (b) providing the webpages, content and related features and services;
- (c) administering subscriptions to our services;
- (d) enabling suppliers and service providers to carry out certain functions on our behalf in order to provide the webpages, content and services, including webhosting, data storage, identity verification, technical and other functions, as applicable;
- (e) allowing you to use features on our webpages, content and related services, when you choose to do so;
- (f) sending you personalised marketing communications as permitted by law or as requested by you;
- (g) sending personalised advertising to your devices, based on your interests in accordance with our Cookie Statement below. You have the right to disable cookies as set out below;
- (h) ensuring the security of our organisation and preventing and detecting fraud;
- (i) developing and improving our webpages, content and related services;
- (j) complying with applicable law in pursuance of our duties, as well as in response to a lawful request from a court or regulatory body; and
- (k) creating a user account for you with our account with DocuSign to provide access to NotarySign (as defined in our terms and conditions); and
- (l) auditing usage of the DocuSign and IDNow services provided via NotarySign to audit usage for the purpose of billing and monitoring compliance with our terms and conditions of use.

The legal basis for our processing of personal data for the purposes described above will typically include:

- processing necessary to fulfil a contract that we have in place with you or other data subjects, such as processing for the purposes set out in paragraphs (a), (b), (c), (d), (e), (k) and (l);
- your consent, such as processing for the purposes set out in paragraphs (e), (f) and (g);

- processing necessary for our or a third party's legitimate interests, such as processing for the purposes set out in paragraphs (a), (b), (c), (h), (f), (h) and (i), (k) and (l), which is carried out on the basis of our legitimate interests to ensure that our website, content and related services are properly provided, ensure the security of our organisation and our users and the proper administration of our organisation including billing and ensuring compliance with our terms and conditions of use;
- processing necessary for compliance with a legal obligation to which we are subject, such as processing for the purposes set out in paragraph (j); and
- any other applicable legal ground from time to time.

UNSUBSCRIBE

We hope you will be pleased with our information and services. However, if you do not wish to receive emails from us and want to be removed from our electronic mailing list, please email us at the address given below with "email unsubscribe" in the subject heading.

If you also wish to be removed from our postal marketing database, please let us know by emailing us at the address given below with "mail unsubscribe" in the subject heading or writing to us at the address given below.

You may unsubscribe by emailing admin@notarysign.uk or writing to the address given in our terms and conditions of use.

COOKIES AND SIMILAR TECHNOLOGIES

In order to collect the information including personal data described in this privacy notice, we may use cookie and similar technology on our webpages.

A cookie is a small piece of information which is sent to your browser and stored on your computer's hard drive, mobile phone or other device. Cookies can be first party, i.e. cookies that the website you are visiting places on your device, or third party cookies, i.e. cookies placed on your device through the website but by third parties, such as, Google. For more information, please visit www.allaboutcookies.org.

You can set your browser to notify you when you receive a cookie. This enables you to decide if you want to accept it or not. However, some of the services and features offered through our webpages may not function properly if your cookies are disabled. You may also opt-out from third party cookies by selecting appropriate options on <http://www.youronlinechoices.com/uk/>.

We use the following types of cookies on our website:

1. Strictly necessary cookies

These cookies are essential in order to enable you to move around the webpages and use its features. Without these cookies, services you have asked

for cannot be provided. They are deleted when you close the browser.

2. Performance cookies

These cookies collect information about users on our webpages. They allow us to recognise and count the number of users and to see how users move around the webpages when they are using it.

3. Functionality cookies

These cookies allow our webpages to remember choices you make (such as your user name, language or the region you are in, if applicable) and provide enhanced, more personal features. The information these cookies collect may be anonymised and they cannot track your browsing activity on other websites. These are first party cookies.

Please note that DocuSign and IDNow may also use cookies and may even require their use in order to provide their services. Please refer to their relevant terms and conditions and privacy notices for details of their use of cookies.

DISCLOSURE AND TRANSFER OF YOUR PERSONAL DATA

We do not share, sell, distribute or transfer your personal data with or to third parties, except as otherwise provided for in this privacy notice.

There are circumstances where we may wish to disclose or are compelled to disclose your personal data to third parties, such as:

- The Notaries Society, DocuSign and IDNow in connection with subscriptions administration, user accounting reconciliation, and training and professional development
- Our nominee or trust companies, and other professionals or third party suppliers who act for or with us. This may include IT consultants, IT support contractors, webhosting providers, recruitment services providers, accountants, identity verification partners (in order to verify your identity against public databases), event organisers and event subscribers, document processing agents, call centres, consultants and similar third parties;
- We may share, transfer or disclose the information in our databases and server logs to comply with a legal requirement, for the administration of justice, interacting with anti-fraud databases, to protect your vital interests, to protect the security or integrity of our databases or this website, to take precautions against legal liability, or in the event of a joint venture, collaboration, financing, sale, merger, reorganisation, change of legal form, dissolution or similar event.
- We may share, transfer or disclose your personal data to a potential or actual successor to us.

- Public authorities, such as law enforcement agencies, courts and other public bodies where we are required by law to do so;
- Other third parties where you have provided your consent.

Where appropriate, before disclosing personal data to a third party, we contractually require the third party to take adequate precautions to protect that personal data and to comply with applicable law.

INTERNATIONAL DATA TRANSFERS

We may disclose or transfer your personal data to a third party in countries outside the UK for further processing in accordance with the purposes for which your personal data were originally collected or for purposes to which you have consented. In these circumstances we will ensure that your rights are adequately protected by technical and contractual means, in particular that appropriate transfer mechanisms, such as the UK International Data Transfer Agreement, are in place to ensure an adequate level of data protection, where applicable.

DATA RETENTION

We retain personal data for as long as is necessary for the purposes listed above or longer as may be required by the law. Please contact us for further details of applicable retention periods. We may keep an anonymised form of your personal data, which will no longer refer to you, for statistical purposes without time limits, to the extent that we have a legitimate and lawful interest in doing so. We will oblige our third party suppliers who act for us to delete all personal data when no longer needed or latest upon termination of our relationship. We will retain personal data in accordance with the instructions of third parties where we act on their behalf as a data processor.

In relation to each of DocuSign and IDNow, they will retain personal data in accordance with their own terms and conditions and privacy notices. We may have access to that information for the period for which it is held by DocuSign and IDNow (as appropriate).

SECURITY OF PERSONAL DATA

We will use appropriate technical and organisational information security measures to try to prevent unauthorised access to your personal data. However, please be aware that the transmission of information via the internet is never completely secure. Whilst we can do our best to keep our own systems secure, we cannot control the whole of the Internet and we cannot therefore guarantee the security of your information as it is transmitted to and from our website.

Where you have created or received a password or authentication code which enables you to access our webpages, you are responsible for keeping this password or authentication code confidential. We ask you not to share your password or authentication code with anyone.

DATA SUBJECT RIGHTS

You may have numerous rights (including those listed below) in relation to your personal data except where we processed such data on behalf of another party. For further information about your data privacy rights please visit the [website](#) of the Information Commissioner's Office. We will aim to acknowledge each request emailed to <mailto:admin@notarysign.uk> within 7 days of receipt.

- Right to make a subject access request (SAR). Data subjects may request in writing copies of their personal data. However, compliance with such requests is subject to certain limitations and exemptions and the rights of other individuals. Each request should make clear that a SAR is being made. You may also be required to submit a proof of your identity and, in limited circumstances, a payment.
- Right to rectification. Data subjects may request that we rectify any inaccurate or incomplete personal data.
- Right to withdraw consent. Data subjects may at any time withdraw their consent to the processing of their personal data carried out by us on the basis of their previous consent. Such withdrawal will not affect the lawfulness of processing based on such previous consent.
- Right to object to processing including profiling. We will comply with valid objection requests unless we have a compelling overriding legitimate ground for the continuation of our processing or we have another lawful reason to refuse such request. We will comply with each valid opt-out request in relation to marketing communications.
- Rights in relation to automated decisions about you. Where we make a decision about you based solely on automated processing which significantly affects you, you will have you the right to contest the decision, express your point of view and obtain human intervention.
- Right to erasure. Data subjects may request that we erase their personal data. We will comply, unless there is a lawful reason for not doing so. For example, there may be an overriding legitimate ground for keeping the personal data, such as, our record retention obligations that we have to comply with.
- Data subjects may request that we restrict our processing of their personal data in various circumstances. We will comply, unless there is a lawful reason for not doing so, such as, a legal obligation to continue processing your personal data in a certain way.
- Right to data portability. In certain circumstances, data subjects may request the controller to provide a copy of their personal data in a structured, commonly used and machine-readable format and have it transferred to another provider of the same or similar services. We do not consider that this right applies to our website, content or services. However, to the extent it does, we will comply with such transfer request. Please note that a transfer to another provider does not imply erasure of the data subject's personal data which may still be retained for legitimate and lawful purposes.
- Right to lodge a complaint with the Information Commissioner's Office. We suggest that data subjects contact us about any questions or complaints in relation to how we process their personal data. However, each data subject has the right to contact the relevant supervisory authority directly.

Where we act on behalf of another party as a data processor, we will pass on any rights requests to such party who will then be in touch with the requestor.

LINKS TO OTHER WEBSITES

Our website may contain hyperlinks to websites that are not operated by us. These hyperlinks are provided for your reference and convenience only and do not imply any endorsement of the activities of such third-party websites or any association with their operators. We do not control these websites and are not responsible for their personal data practices. We urge you to review any privacy notice posted on any site you visit before using the site or providing any personal data about yourself.

CHILDREN

Our webpages, content and services are not intended for minors and all users should be over 18 years old.