# **Privacy Policy**

### Introduction

We are Conveyd ("we," "us," or "our"), a provider of property transaction workflow technology. This privacy policy, together with our Terms of Service and any Data Processing Agreement we conclude with you, sets out how we collect, use, and protect your personal information when you use our platform services. Our services operate in two distinct capacities: (i) As a facilitator for homeowners to collect and share their personal and property information (ii) As a provider of workflow platform technology to legal service providers. Our services are not intended for children and we do not knowingly collect data relating to children.

Please read this privacy policy carefully to understand how and why we collect and use your personal information. This privacy policy supplements any Data Processing Agreement or other notices or privacy policies and is not intended to override them.

Where we determine the purpose and means of processing your personal information, we are the controller and responsible for your personal information. If you have any questions about this privacy policy or our privacy practices, please contact us at support@conveyd.co.uk.

### **Personal Information We Collect About You**

Personal information means any information about you from which you can be identified. We may collect and use the following personal information about you:

- a. Identity Data including:
  - First name and last name
  - Property ownership details
  - Identification documents
- b. Contact Data including:
  - Email address
  - Telephone numbers
  - Current and previous addresses
- c. Property Information including:
  - Property details
  - Transaction-related information
  - Property documentation

- d. Technical Data including:
  - Internet protocol (IP) address
  - Login data
  - Browser type and version
  - Time zone setting and location
  - Operating system and platform
  - Device information
- e. Usage Data including:
  - Information about how you use our platform
  - Transaction progress
  - Document submissions

### **How We Collect Your Personal Information**

We collect your personal information through:

- Direct interactions when you use our platform
- Information you provide during property transactions
- Your communications with us
- Your use of our platform services
- Information shared by our Legal Partners
- Identity verification processes

### **How We Use Your Personal Information**

Under data protection law, we can only use your personal information if we have a proper reason to do so. We will use your personal information for the following purposes:

- a. For the performance of our contract with you:
  - Facilitating property transactions
  - Sharing information with your chosen Legal Partner
  - Managing your platform access and usage
  - Processing your property transaction information
- b. To comply with our legal obligations:
  - Identity verification
  - Anti-fraud measures
  - Regulatory compliance
  - Data protection requirements
- c. For our legitimate interests:
  - Platform operation and improvement

- Security monitoring and enhancement
- Service quality improvement
- Transaction processing efficiency

## **Data Storage and Security**

We implement robust security measures including:

#### a. Infrastructure:

- Storage on Google Cloud Platform
- UK-based data centers
- Encryption in transit and at rest

#### b. Security Controls:

- Multi-factor authentication
- Regular security updates
- Automated threat detection
- Access logging and monitoring
- Regular security audits

## **Information Sharing**

We share your information with:

#### a. Legal Partners:

- With our partner conveyancing firm so they can process your case
- Through secure, authenticated channels
- Only information necessary for transactions

#### b. Third-Party Service Providers:

- Identity verification providers (e.g., Thirdfort, mortgage brokers if you have asked for it)
- Google Cloud Platform
- Other essential service providers

All third-party providers are carefully selected and bound by appropriate data processing agreements.

## **International Transfers**

We store all data within the United Kingdom. If any transfer outside the UK becomes necessary:

We will ensure appropriate safeguards are in place

- We will comply with UK data protection laws
- We will obtain necessary consents where required

## **Your Rights**

You have the right to:

- Access your personal information
- Request corrections
- Request deletion
- Object to processing
- Request data portability
- Withdraw consent
- Lodge a complaint with the Information Commissioner's Office (ICO)

## **How Long We Keep Your Information**

We retain your personal information only for as long as necessary to:

- Complete your property transaction
- Comply with legal obligations
- Respond to queries or complaints
- Maintain appropriate business records

### How We Use Al

We use the following AI models: OpenAI's ChatGPT through their API service

What data is shared with these models: We share publicly available property documents with the AI model for analysis and summarization. If you include personal data in your prompts or if personal data appears in public property documents, this information will be processed by the model.

The purpose of sharing this data with the model: For the AI model to analyze and summarize property documents to assist with property transactions.

How the model uses this data and the impact it could have on you: While OpenAl's default API settings after March 1, 2023, do not use data for training, we cannot independently verify the model's data usage practices. We have implemented the following safeguards:

- We have opted out of data usage for training where such options are available
- We regularly review OpenAl's data usage policies and terms of service
- We minimize the personal data shared with the model

How does this impact my personal data: Your personal data is not directly shared with the model unless it appears in public property documents that require analysis. To protect your

privacy, we recommend not including unnecessary personal information in documents submitted for Al analysis

## **Changes to This Privacy Policy**

We may update this privacy policy from time to time. We will notify you of any significant changes and obtain consent where required.

### **How to Contact Us**

For any questions about this privacy policy or our privacy practices, please contact us at: Email: support@conveyd.co.uk

## **How to Complain**

If you have any concerns about our use of your personal information, you can make a complaint to us at support@conveyd.co.uk.

You can also complain to the Information Commissioner's Office (ICO) if you are unhappy with how we have used your personal information. The ICO's contact details are:

• Website: <a href="https://ico.org.uk/concerns">https://ico.org.uk/concerns</a>

• Telephone: 0303 123 1113