



## Personal Data Protection Policy

Please take a moment to read the following Policy. If there is anything you do not understand then please contact us.

We are committed to protecting privacy. This Personal Data Protection Policy sets out how we treat personal information, allowing people to make informed choices about the personal information that is provided to us.

This Privacy Policy may be amended from time to time, and we therefore suggest that you review it periodically.

### Aims of this Policy

Stewart Title Limited ("Stewart") is a leading provider of title insurance to homeowners, commercial property owners and mortgage lenders.

Stewart Title Limited ("Stewart") needs to keep certain information on its Insureds and employed staff to carry out its day to day operations, to meet its objectives and to comply with legal obligations.

Stewart is committed to ensuring any personal data will be dealt with in line with the *Data Protection Act 1998*. To comply with the law, personal information will be collected and used fairly, stored safely and not disclosed to any other person unlawfully.

The aim of this policy is to ensure that everyone handling personal data is fully aware of the requirements and acts in accordance with data protection procedures. This document also highlights key data protection procedures within Stewart and confirms our commitment to protecting personal data.

### Definitions:

In line with the *Data Protection Act 1998* principles, Stewart will ensure that personal data will:

- Be obtained fairly and lawfully and shall not be processed unless certain conditions are met
- Be obtained for a specific and lawful purpose
- Be adequate, relevant but not excessive
- Be accurate and kept up to date
- Not be held longer than necessary
- Be processed in accordance with the rights of data subjects
- Be subject to appropriate security measures
- Not to be transferred outside the European Economic Area (EEA) unless that country ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

The definition of 'Processing' is obtaining, using, holding, amending, disclosing, destroying and deleting personal data. This includes some paper based personal data as well as that kept electronically.

The *Personal Data Guardianship Code* suggests five key principles of good data governance on which best practice is based. Stewart will seek to abide by this code in relation to all the personal data it processes, namely:

- **Accountability:** those handling personal data follow publicised data principles to help gain public trust and safeguard personal data.
- **Visibility:** Data subjects should have access to the information about themselves that Stewart holds. This includes the right to have incorrect personal data corrected and to know who has had access to this data.
- **Consent:** The collection and use of personal data must be fair and lawful and in accordance with the DPA's eight data protection principles. Personal data should only be used for the purposes agreed by the data subject. If personal data is to be shared with a third party, such sharing should pose little risk to the rights and freedoms of the individual concerned.
- **Access:** Everyone should have the right to know the roles and groups of people within an organization who have access to their personal data and who has used this data.
- **Stewardship:** Those collecting personal data have a duty of care to protect this data throughout the data life span.

#### **Type of Information Processed:**

Stewart processes the following personal information:

- Property addresses, property prices and Insured names
- Personal information related to human resources records including NIN, age, address, and salary

Personal information is kept in the following forms:

- Paper documents and soft media (emails, .pdf documents, Word documents)

Groups of people within Stewart who will process personal information are:

- Employed staff

#### **Notification:**

The needs we have for processing personal data are recorded on the public register maintained by the Information Commissioner. We notify and renew our notification on an annual basis as the law requires.

If there are any interim changes, these will be notified to the Information Commissioner within 28 days.

The name of the Data Controller within our organisation as specified in our notification to the Information Commissioner is Katja Huitikka.

### **Responsibilities:**

Under the Data Protection Guardianship Code, overall responsibility for personal data rests with the governing body. In the case of Stewart this is the Board of Directors.

The Board of Directors delegates tasks to the Data Controller. The Data Controller is responsible for:

- understanding and communicating obligations under the Act
- identifying potential problem areas or risks
- producing clear and effective procedures
- notifying and annually renewing notification to the Information Commissioner, plus notifying of any relevant interim changes

All employed staff who process personal information must ensure they not only understand but also act in line with this policy and the data protection principles.

Breach of this policy will result in disciplinary proceedings.

### **Policy Implementation:**

To meet our responsibilities, our employed staff will:

- Ensure any personal data is collected in a fair and lawful way;
- Explain why it is needed at the start;
- Ensure that only the minimum amount of information needed is collected and used;
- Ensure the information used is up to date and accurate;
- Review the length of time information is held;
- Ensure it is kept safely;
- Ensure the rights people have in relation to their personal data can be exercised

We will ensure that:

- Everyone managing and handling personal information is trained to do so.
- Anyone wanting to make enquiries about handling personal information, whether a member of staff, volunteer or service user, knows what to do;
- Any disclosure of personal data will be in line with our procedures.

Queries about handling personal information will be dealt with swiftly and politely.

### **Training:**

Training and awareness raising about the Data Protection Act and how it is followed in this organisation will take the following forms:

- On induction

- General training/ awareness raising

### **Data Security:**

We are strongly committed to personal data security and we take reasonable and appropriate steps to protect personal information from unauthorised access, unlawful loss or disclosure, misuse, alteration or corruption. We have put in place physical, electronic, and managerial procedures to safeguard and secure personal information.

The following measures will be taken:

- Using lockable cupboards (restricted access to keys)
- Password protection on personal information files
- Setting up computer systems to allow restricted access to certain areas
- Password protection on all laptops
- Password protected attachments for sensitive personal information sent by email

Any unauthorised disclosure of personal data to a third party by an employee may result in disciplinary proceedings.

### **Website and Cookies:**

When you visit Stewart's website, if you do nothing during your visit but browse through the information contained on the web pages, we still may gather certain information about your visit automatically. This information does not identify you personally. We may automatically gather the Internet domain (for example, "companyx.com" if you use a private Internet access account), IP address (an IP address is a number that is automatically assigned to your computer whenever you are surfing the web) from which you access our websites, and the date and time you access our website, and the pages you visit.

Cookies are small files stored in your computer's hard drive by your web browser. When you access the website our computer server will access these cookies so that it can recognise your computer, and make using the website easier for you. For example, cookies allow us to remember your username and password to save you having to retype it every time you visit the website.

On May 26, 2011, a new directive was passed by the European Union (EU) that requires all companies to obtain "free specific and informed consent" from all European visitors to their website in order to capture cookies. The law requires "opt in" functionality, only allowing cookies to be placed on computers where the user has given his or her consent in advance. Once consent is obtained we will not need to request permission again in the future unless you delete your cookies. If you believe that you qualify under the EU Cookies Directive but did not receive the opportunity to opt-in or opt-out at our website, please submit an email to [webmaster@stewart.com](mailto:webmaster@stewart.com) so we can identify and resolve the issue.

You can alter your settings to allow you to be prompted every time a cookie is sent to you or you can choose not to receive cookies at all. However, please note that if you

have "disabled" cookies in your browser this way or you have "opted out" you may not be able to use certain features on the website. For independent information about cookies you can go to [www.allaboutcookies.org](http://www.allaboutcookies.org).

### **YouTube cookies**

We embed videos from our official YouTube channel using YouTube's privacy-enhanced mode. This mode may set cookies on your computer once you click on the YouTube video player, but YouTube will not store personally-identifiable cookie information for playbacks of embedded videos using the privacy-enhanced mode. To find out more please visit [YouTube's embedding videos information page](#).

### **Transfers and Disclosure of Personal Information**

From time to time we transfer personal data, which may include electronic formats such as emails, for administrative, data backup, processing purposes (including claims administration) and reinsurance purposes to our affiliate, Stewart Title Guaranty Company Canadian Division (Canada), and/or our international head office, Stewart Title Guaranty Company, (United States of America). Personal data transferred outside of the United Kingdom may be accessible to regulatory authorities and enforcement agencies in accordance with the laws of the respective countries. We may also transfer personal data to third parties retained to assist in the administration and investigation of a claim reported to us.

We use contractual or other safeguards to ensure protection of personal data transferred to Stewart Title Limited's parent or related companies or to third party service providers.

Personal data transferred to and stored at Stewart's parent or related companies has a comparable level of protection to that provided by Stewart Title Limited here in the United Kingdom.

Personal information transferred outside of the United Kingdom may be accessible to regulatory authorities and enforcement agencies in accordance with the laws of the respective jurisdiction(s).

We reserve the right to give personal information to a third party without consent where:

- the disclosure is required by law, such as where there is a court order, or statutory obligation requiring us to make such a disclosure; and/or
- we believe that such disclosure is necessary in order to assist in the prevention or detection of any criminal action (including fraud) or is otherwise in the overriding public interest, and/or is permitted by law.

Information about Stewart Title Limited's policies and practices with respect to third party service providers may be obtained as set out below.

### **Subject Access Requests:**

Anyone whose personal information we process has the right to know:

- What information we hold and process on them
- How to gain access to this information
- How to keep it up to date
- What we are doing to comply with the Act.

They also have the right to prevent processing of their personal data in some circumstances and the right to correct, rectify, block or erase information regarded as wrong.

Individuals have a right under the Act to access certain personal data being kept about them on computer and certain files. Any person wishing to exercise this right should apply in writing to Katja Huitikka, 6 Henrietta Street, London, UK WC2E 8PS.

The following information will be required before access is granted:

- Confirmation that the individual is an Insured under one of our policies

We may also require proof of identity before access is granted. The following forms of ID will be required:

- Driver's licence
- Passport
- Equivalent identity card

Queries about handling personal information will be dealt with swiftly and politely.

We will aim to comply with requests for access to personal information as soon as possible, but will ensure it is provided within the 40 days required by the Act from receiving the written request.

**Review:**

This policy will be reviewed at intervals of three years to ensure it remains up to date and compliant with the law.