I-KOMPLI Privacy Policy and Terms of Platform Use

Introduction

Welcome to the I-KOMPLI privacy policy.

I-KOMPLI Ltd (a company incorporated in England and Wales under company registration number 15666253) ("I-KOMPLI") provides and operates (as the case may be) a software platform in respect of assisting estate agents and legal firms to obtain information from and lawfully check the identity and other credentials of sellers and buyers marketing, selling and purchasing (as the case may be) residential properties through them. References to the "Platform" in this privacy policy are to that platform which includes the I-KOMPLI app.

I-KOMPLI respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how I-KOMPLI looks after your personal data when I-KOMPLI receives it as a result of your use of the Platform (regardless of where you visit it from). This privacy policy tells you about your privacy rights and how the law protects you.

1. Important information and who I-KOMPLI is

Purpose of this privacy policy

This privacy policy aims to give you information on how I-KOMPLI collects and processes your personal data through your use of the Platform, including any data you may provide when you use the Platform.

The Platform is not intended for use by children and I-KOMPLI does not knowingly collect data relating to children.

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

Controller

I-KOMPLI is the controller and responsible for your personal data.

I-KOMPLI has appointed a data privacy manager 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 the data privacy manager using the details set out below.

Contact details

If you have any questions about this privacy policy or I-KOMPLI's privacy practices, please contact I-KOMPLI's data privacy manager in the following ways:

Email address: *heretohelp@i-kompli.co.uk*

Postal address: 8 Castilian Street, Northampton, NN1 1JX

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

Changes to the privacy policy and your duty to inform I-KOMPLI of changes

I-KOMPLI keeps its privacy policy under regular review. This version was last updated in April 2026.

It is important that the personal data I-KOMPLI holds about you is accurate and current. Please keep I-KOMPLI informed if your personal data changes during your relationship with I-KOMPLI.

Third-party links

The Platform may include links to third-party websites, plug-ins, platforms and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. I-KOMPLI does not control these third-party websites, plug-ins, platforms or applications and is not responsible for their privacy statements. When you leave the Platform, I-KOMPLI encourages you to read the privacy policy of every website, plug-in, platform and application you visit.

2. The data I-KOMPLI collects about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

I-KOMPLI may collect, use, store and transfer different kinds of personal data about you which I-KOMPLI has grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes email address and telephone numbers.
- **Digital Data**.
- **Photographs**.
- **Technical Data** includes internet protocol address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access the Platform.
- **Profile Data** includes your username and password, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use the Platform.
- **Marketing and Communications Data** includes your preferences in receiving marketing from I-KOMPLI and I-KOMPLI's third parties and your communication preferences.

The estate agent or legal firm who has directed you to use the Platform may also provide I-KOMPLI with any of the Identity Data and Contact Data described above.

I-KOMPLI may 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. For example, I-KOMPLI may aggregate your Usage Data to calculate the percentage of users accessing a specific feature of the Platform. However, if I-KOMPLI combines or connects Aggregated Data with your personal data so that it can directly or indirectly identify you, I-KOMPLI treats the combined data as personal data which will be used in accordance with this privacy policy.

With the exception of Digital Data and Photographs, I-KOMPLI does not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor does I-KOMPLI collect any information about criminal convictions and offences.

If you fail to provide personal data

Where I-KOMPLI needs to collect personal data by law, or under the terms of a contract I-KOMPLI has with you or with the estate agent or legal firm who has directed you to use the Platform, and you fail to provide that data when requested, I-KOMPLI may not be able to perform that contract and may not be able to provide you with access to the Platform.

3. How is your personal data collected?

I-KOMPLI may use different methods to collect data from and about you including through:

- **Direct interactions.** You may give I-KOMPLI your Identity and Contact Data by filling in forms (including through the Platform) or by corresponding with I-KOMPLI by post, phone, email or otherwise. This includes personal data you provide when you:
    - apply to use the Platform;
    - create an account on the Platform (via our portal or the app); or
    - give I-KOMPLI feedback or contact I-KOMPLI.
- **Automated technologies or interactions.** As you interact with the Platform, I-KOMPLI may automatically collect Technical Data about your equipment, browsing actions and patterns. I-KOMPLI may use serving cookies and other similar technologies to do this. I-KOMPLI may also receive Technical Data about you if you visit other websites, plug-ins, platforms or applications employing I-KOMPLI's cookies.
- **Third parties.** I-KOMPLI may receive personal data about you from the estate agent or legal firm who has directed you to use the Platform. I-KOMPLI may also record telephone conversations it has with you.

4. How I-KOMPLI uses your personal data

I-KOMPLI will only use your personal data when the law allows I-KOMPLI to. Most commonly, I-KOMPLI will use your personal data in the following circumstances:

- Where I-KOMPLI needs to perform a contract I-KOMPLI has with you or with the estate agent or legal firm who has directed you to use the Platform. I-KOMPLI may also use your personal data on behalf of the estate agent or legal firm who has directed you to use the Platform. Please contact that party directly to understand how they use your personal data. This may include sharing your personal data with third parties.

- Where it is necessary for I-KOMPLI's legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

- Where I-KOMPLI needs to comply with a legal obligation.

Refer to the Glossary to find out more about the types of lawful basis that I-KOMPLI will rely on to process your personal data.

Generally, I-KOMPLI does not rely on consent as a legal basis for processing your personal data although I-KOMPLI will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting I-KOMPLI.

Purposes for which I-KOMPLI will use your personal data

I-KOMPLI uses the information collected for the following purposes:

- Taking payments, identification verification and the verification of other credentials.

- Improving the overall functionality and security of the Platform.

- Otherwise providing you with access to the Platform as requested by the estate agent or legal firm who has directed you to use the Platform so as to provide I-KOMPLI's services to you and/or that estate agent or legal firm. This may include sharing your personal data with that estate agent or legal firm.

I-KOMPLI has set out below, in a table format, a description of all the ways I-KOMPLI may use your personal data, and which of the legal bases I-KOMPLI relies on to do so. I-KOMPLI has also identified what I-KOMPLI's legitimate interests are where appropriate.

Note that I-KOMPLI may process your personal data for more than one lawful ground depending on the specific purpose for which I-KOMPLI is using your data. Please contact I-KOMPLI if you need details about the specific legal ground I-KOMPLI is relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	**Type of data**	**Lawful basis for processing including basis of legitimate interest**
To register you as a new user of the Platform and to allow you to use the Platform	(a) Identity (b) Contact (c) Digital Data (d) Photographs	Performance of a contract with you or the estate agent or legal firm who has directed you to use the Platform
To manage I-KOMPLI's relationship with you which will include: (a) Notifying you about changes to I-KOMPLI's terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you or the estate agent or legal firm who has directed you to use the Platform (b) Necessary to comply with a legal obligation (c) Necessary for I-KOMPLI's legitimate interests (to keep I-KOMPLI's records updated and to study how users use the Platform)
To enable you to or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you or the estate agent or legal firm who has directed you to use the Platform (b) Necessary for I-KOMPLI's legitimate interests (to study how users use the Platform, to develop it and grow I-KOMPLI's business)
To administer and protect I-KOMPLI's business and the Platform (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Digital Data (d) Photographs (e) Technical	(a) Necessary for I-KOMPLI's legitimate interests (for running I-KOMPLI's business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant content and advertisements to you and measure or understand the effectiveness of the advertising I-KOMPLI serves to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for I-KOMPLI's legitimate interests (to study how users use the Platform, to develop the Platform, to grow I-KOMPLI's business and to inform I-KOMPLI's marketing strategy)

To use data analytics to improve the Platform, marketing, user relationships and experiences	(a) Technical (b) Usage	Necessary for I-KOMPLI's legitimate interests (to define types of clients and users for the Platform, to keep the Platform updated and relevant, to develop I-KOMPLI's business and to inform I-KOMPLI's marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for I-KOMPLI's legitimate interests (to develop the Platform and grow I-KOMPLI's business)

Cookies

I-KOMPLI may use cookies to monitor how users use the Platform. This helps I-KOMPLI to understand how users use the Platform so I-KOMPLI can improve things like layout, function and design.

A cookie is a piece of information stored on your computer's or device's hard drive that records how you have used a website, plug-in, platform or application. The next time you visit that website, plug-in, platform or application, it can tailor your options based on the information it has stored about your last visit.

You can set your browser or settings to refuse all or some browser cookies, or to alert you when websites, plug-ins, platforms or applications set or access cookies. If you disable or refuse cookies, please note that some parts of the Platform may become inaccessible or not function properly.

Change of purpose

I-KOMPLI will only use your personal data for the purposes for which I-KOMPLI collected it, unless I-KOMPLI reasonably considers that I-KOMPLI needs to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact I-KOMPLI.

If I-KOMPLI needs to use your personal data for an unrelated purpose, I-KOMPLI will notify you and I-KOMPLI will explain the legal basis which allows I-KOMPLI to do so.

Please note that I-KOMPLI may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

I-KOMPLI does not sell, trade or otherwise transfer your information to third parties except as set out in this privacy notice. Your personal data is only disclosed in accordance with this privacy notice, applicable laws or with your explicit consent.

6. International transfers

I-KOMPLI may transfer your personal data to countries outside the UK. Although such countries may not be subject to the same data protection laws as organisations based in the UK, I-KOMPLI will take steps to make sure they provide an adequate level of protection in accordance with UK data protection law. By submitting your personal information to I-KOMPLI you agree to this transfer, storing or processing at a location outside the UK.

Whenever I-KOMPLI transfers your personal data out of the UK, I-KOMPLI will ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

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

Please contact I-KOMPLI if you want further information on the specific mechanism used by I-KOMPLI when transferring your personal data outside of the UK.

7. Data security

I-KOMPLI has 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, I-KOMPLI limits access to your personal data to those employees, clients, agents, contractors and other third parties who have a business need to know. They will only process your personal data on I-KOMPLI's instructions and they are subject to a duty of confidentiality.

I-KOMPLI has put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where I-KOMPLI is legally required to do so.

8. Data retention

How long will I-KOMPLI use your personal data for?

I-KOMPLI will only retain your personal data for as long as reasonably necessary to fulfil the purposes I-KOMPLI collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. I-KOMPLI may retain your personal data for a longer period in the event of a complaint or if I-KOMPLI reasonably believes there is a prospect of litigation in respect to I-KOMPLI's relationship with you or the estate agent or legal firm who has directed you to use the Platform.

To determine the appropriate retention period for personal data, I-KOMPLI considers 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 I-KOMPLI processes your personal data and whether I-KOMPLI can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

By law I-KOMPLI may have to keep basic information about users of the Platform (including Contact and Identity Data) for 6 years after the cessation of a relevant relationship for tax purposes.

In some circumstances you can ask I-KOMPLI to delete your data: see your legal rights below for further information.

In some circumstances I-KOMPLI may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case I-KOMPLI may use this information indefinitely without further notice to you.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

If you wish to exercise any of the rights set out above, please contact I-KOMPLI.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, I-KOMPLI may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, I-KOMPLI could refuse to comply with your request in these circumstances.

What I-KOMPLI may need from you

I-KOMPLI may need to request specific information from you to help I-KOMPLI confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. I-KOMPLI may also contact you to ask you for further information in relation to your request to speed up I-KOMPLI's response.

Time limit to respond

I-KOMPLI will try to respond to all legitimate requests within 1 month. Occasionally it could take I-KOMPLI longer than a month if your request is particularly complex or you have made a number of requests. In this case, I-KOMPLI will notify you and keep you updated.

10. Glossary

LAWFUL BASIS

Legitimate Interest means the interest of I-KOMPLI's business in conducting and managing I-KOMPLI's business to enable I-KOMPLI to give you the best service/product and the best and most secure experience. I-KOMPLI makes sure I-KOMPLI considers and balances any potential impact on you (both positive and negative) and your rights before I-KOMPLI's processes your personal data for I-KOMPLI's legitimate interests. I-KOMPLI does not use your personal data for activities where I-KOMPLI's interests are overridden by the impact on you (unless I-KOMPLI has your consent or is otherwise required or permitted to by law). You can obtain further information about how I-KOMPLI assesses I-KOMPLI's legitimate interests against any potential impact on you in respect of specific activities by contacting I-KOMPLI.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you or the estate agent or legal firm who has directed you to use the Platform are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that I-KOMPLI is subject to.

THIRD PARTIES

Internal Third Parties

Other companies in the group of companies or limited liability partnerships to which I-KOMPLI belongs acting as joint controllers or processors.

External Third Parties

- Service providers (including hosts of the Platform) acting as processors based inside and outside of the UK as well as the estate agent or legal firm who has directed you to use the Platform and any provider of legal services who you have requested contact you when using the Platform (in return for which I-KOMPLI may receive a fee).

- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.

- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the UK who require reporting of processing activities in certain circumstances.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data I-KOMPLI holds about you and to check that I-KOMPLI is lawfully processing it.

Request correction of the personal data that I-KOMPLI holds about you. This enables you to have any incomplete or inaccurate data I-KOMPLI holds about you corrected, though I-KOMPLI may need to verify the accuracy of the new data you provide to I-KOMPLI.

Request erasure of your personal data. This enables you to ask I-KOMPLI to delete or remove personal data where there is no good reason for I-KOMPLI continuing to process it. You also have the right to ask I-KOMPLI to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where I-KOMPLI may have processed your information unlawfully or where I-KOMPLI is required to erase your personal data to comply with local law. Note, however, that I-KOMPLI 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 I-KOMPLI is 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. You also have the right to object where I-KOMPLI is processing your personal data for direct marketing purposes. In some cases, I-KOMPLI may demonstrate that I-KOMPLI has compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask I-KOMPLI to suspend the processing of your personal data in the following scenarios:

- If you want I-KOMPLI to establish the data's accuracy.
- Where I-KOMPLI’s use of the data is unlawful but you do not want I-KOMPLI to erase it.
- Where you need I-KOMPLI to hold the data even if I-KOMPLI no longer requires it as you need it to establish, exercise or defend legal claims.
- You have objected to I-KOMPLI’s use of your data but I-KOMPLI needs to verify whether I-KOMPLI has overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. I-KOMPLI 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 automated information which you initially provided consent for I-KOMPLI to use or where I-KOMPLI used the information to perform a contract with you.

Withdraw consent at any time where I-KOMPLI is 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, I-KOMPLI may not be able to provide continued access to the Platform to you. I-KOMPLI will advise you if this is the case at the time you withdraw your consent.

Terms of Platform Use

Intellectual property rights

I-KOMPLI is the owner or the licensee of all intellectual property rights in the Platform, and in the material published on it. Those works are protected by copyright laws and treaties around the world. All such rights are reserved.

Do not rely on information on the Platform

The content on the Platform is provided for general information only. It is not intended to amount to advice on which you should rely. You must obtain professional or specialist advice before taking, or refraining from, any action on the basis of the content on the Platform.

Although I-KOMPLI makes reasonable efforts to update the information on the Platform, I-KOMPLI makes no representations, warranties or guarantees, whether express or implied, that the content on the Platform is accurate, complete or up to date.