CLC
Record of Processing Activity

Any queries about the CLC Record of Processing Activity may be directed to the CLC Data Protection Officer, Audrey Cosens, Head of Executive Office either by writing to:

CLC, WeWork, 120 Moorgate, London, EC2M 6UR or by e-mailing privacy@clc-uk.org

Date of last review: December 2025
Date of next review: June 2026

	Purpose of processing	Owner	Categories of Individuals	Personal data	Access * Access to internal CLC folders is by secure cloud log in	Shared * The CLC does not transfer data to third countries.	Retention
Complaints - regulated practices	These record complaints made about CLC Practices and Lawyers	Regulatory Supervision Team	Regulated bodies & individuals; consumers; other authorities connected to the CLC's work	This may include: •Names, emails and contact details. •Hardcopy or electronic client files may be obtained from practices. •Transaction files will contain a wide variety of personal data for clients and potentially third parties (eg. the seller on a purchase file), including names, addresses, date of birth, financial information.	CLC employees	Information is shared with the CLC Lawyer/Practice to enable that person to properly respond to the complaint. The CLC will only share data when necessary with a legitimately interested party, for example other regulatory bodies, Legal Ombudsman, National Crime Agency or insurer, when they have a regulatory interest in the CLC's investigation/outcome.	Complaints are stored indefinitely for reference should further/related complaints or claims be brought, and for audit purposes.
Complaints about the CLC	These record complaints made about the CLC	Head of Executive Office	Consumers and members of the public and/or their representatives	May include personal data or financial information, names, addresses, telephone numbers and e-mail addresses	Head of Executive Office & Senior Management Team	Information is shared with the line manager of the Department that is relevant to the complaint for investigation or a member of the Senior Management Team who has not had direct involvement with the matter.	Complaints are stored indefinitely for reference should any further related complaints or claims be brought, and for audit purposes
Education and Ongoing Competence	These records confirm whether an individual is eligible for an exemption from course modules when undertaking further education.	Deputy Director of Authorisations and New Business	Student, trainee and regulated individuals	Personal data including name, address, telephone number and e-mail address. Applications for Professional Experience Exemptions and sample requests for records of continuous professional development. ID may also be requested.	CLC employees	All data is stored electronically and is shared only with the individual on request. The request for information must be made in writing or via email.	Details of education/qualification progress are stored indefinitely for reference should further education be undertaken and an exemption is sought. Details of Professional Experience Exemptions are stored indefinitely for reference for future licence applications. ID is erased by the CLC no later than 24 months after receipt, unless there are regulatory reasons for its retention.

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Licensing	Records relating to the process of regulating conveyancing and probate practitioners, authorised persons and key roleholders.	Deputy Director of Authorisations	Licensed conveyancers and applicants to become licensed conveyancers	Application forms to become a licensed conveyancer or probate practitioner and annual declarations contain name, address, email. Background screening performed by the CLC provider includes applicant ID and DBS records.	CLC employees	All data is stored electronically. The data may be shared with other regulators or statutory authorities in certain circumstances, for example in connection with applications to be regulated, disciplinary or criminal investigations.	Electronic applications for licences are held by the CLC for 24 months. Screening data, including ID and DBS checks are erased by the CLC no later than 24 months after receipt, unless there are regulatory reasons (such as disciplinary investigations), in which case the data is erased no later than 12 months after a regulatory reason ceases to apply. Data collated by the CLC screening providers will automatically be deleted 12 months after receipt. Annual declarations are held by the CLC for 4 years, unless there are regulatory reasons (such as disciplinary investigations) in which case the data is erased no later than 12 months after a regulatory reason ceases to apply.
File requests	Enables CLC to respond to requests for file returns.	Administrative Officer	Members of the public and/or their representatives; the Ombudsman, statutory authorities (e.g. The Police, NCA, HMRC)	Personal data including name, address, telephone number and e-mail address; may also include solicitor details, property details.	CLC employees	Only with the client who requested the file or the property lawyer who has provided a form of authority on behalf of the client or statutory or regulatory authority.	ID or authority obtained from people making the request is erased within 6 months of receipt. Data that is held in connection with regulatory or law enforcement investigations will be retained indefinitely.
General enquiries	Enables CLC to respond to queries.	All CLC employees	Members of the public and/or their representatives; other regulatory or statutory bodies	If the enquiry is made by telephone, the individual's name, telephone, email address are collected. If the enquiry is made via email, the email is forwarded on to the relevant member of CLC staff.	CLC employees	No	Personal details of individuals who have made a general enquiry are erased within 12 months of response unless information is required for regulatory purposes.
Regulatory Supervision and Monitoring	Data is required to enable the RSMs to carry out their duties of regulatory monitoring and oversight.	Regulatory Supervision Team	Regulated bodies & individuals; consumers; other authorities connected to the CLC's work	Names, emails and contact details for employees of regulated practices. Hardcopy or electronic client files may be obtained from practices. Files will contain a wide variety of personal data for clients and potentially third parties (eg. the seller on a purchase file), including names, addresses, date of birth, financial information.	CLC employees	We may be required to share information about regulated practitioners, practices and clients with statutory authorities, including other regulators, the Police or National Crime Agency, HMRC or insurers in connection with our public task. Any information is shared securely.	Regulatory monitoring and supervision data is held indefinitely for regulatory and insurance purposes in connection with the CLC's role to regulate in the public interest.

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Compensation Fund Applications	Data is collected to assess and process applications for compensation to consumers who have suffered a loss as a result of negligence, failure to account or dishonesty on the part of the conveyancing practice.	Regulatory Supervision Team	Compensation fund applicants.	Yes, including name, address, telephone, e-mail , financial information and claimant ID	Restricted access to Compensation Fund Assessors	Information may be shared with statutory authorities, in connection with public task duties. The CLC's Memoranda of Understanding with regulatory bodies, including HMRC and HMT are published at: https://www.clc-uk.org/about/corporate-documents/mous-with-other-regulators/	Claimant ID and bank details will be securely deleted within 12 months of receipt. Claim applications and details of assessment and award/refusal will be kept indefinitely for audit purposes and in the event of challenge.
HR	The data is collected for the purposes of employment or appointment to office.	Head of Executive Office	CLC employees, contractors, council members, independent members, adjudication panel members and applications for employment	Payroll and pensions information – national insurance number, banking details, name, address, telephone, email. Names, emails and contact details, including emergency contact and contact information for business continuity purposes. Information required for recruitment – employer references, qualifications, employee ID and background screening, marriage certificates.	Restricted access to SMT and Executive office	Tax and national insurance information is shared with HMRC. Contact information for Adjudication Panel members is shared with the Chair of the independent Adjudication Panel for administrative purposes.	Personnel data is erased 7 years after leaving CLC employment. Payroll information, including salary, tax and NI will be held for 7 years after employment ends. Anonymised equality monitoring information is kept indefinitely for audit and monitoring purposes. Employee ID and background screening data will be securely deleted by the CLC and its screening provider on an annual basis. As personal contact information is held on the CLC Business Continuity Plan, previous versions of the Business Continuity Plan will be erased each time the Plan is reviewed and amended.