

## Privacy Notice

During the course of dealing with us, we will ask you to provide us with personal information (your personal data). This document allows us to explain to you what we will need to do with your personal data, and the various rights you have in relation to your personal data.

### **What do we mean by "your personal data"?**

Your personal data means any information that describes or relates to your personal circumstances. Your personal data may identify you directly, for example your name, address, date of birth, National Insurance number, and may also identify you indirectly, for example, your employment situation.

In the context of providing you with assistance in relation to your financial affairs, your personal data may include:

- Title, names, date of birth, gender, nationality, civil/marital status, contact details, addresses and documents that are necessary to verify your identity
- Employment and remuneration information, (including salary/bonus schemes/overtime/sick pay/other benefits), employment history
- Bank account details, tax information, loans and credit commitments, personal credit history, sources of income and expenditure, family circumstances and details of dependents
- Health status and history, details of treatment and prognosis, medical reports (further details are provided below specifically with regard to the processing we may undertake in relation to this type of information)

### **The basis upon which we will deal with your personal data**

When we speak with you about your financial affairs, we do so on the basis that both parties are entering a contract for the supply of services.

In order to perform that contract, and to arrange the services you require, we have the right to use your personal data for the purposes detailed below.

Alternatively, either in the course of initial discussions with you or when the contract between us has come to an end for whatever reason, we have the right to use your personal data provided it is in our legitimate business interest to do so and your rights are not affected. For example, we may need to respond to requests from our compliance service provider relating to the advice we have given to you, for contractual responsibilities we may owe our regulator The Financial Conduct Authority, or for wider compliance with any legal or regulatory obligation to which we might be subject. In such circumstances, we would be processing your personal data in order to meet a legal, compliance or other regulatory obligation to which we are subject.

### **The basis upon which we will process certain parts of your personal data**

While it is unlikely in relation to the services we provide, we may need to ask you information about your ethnic origin, your health and medical history (your special category data). We will record and use your special category data in order to make enquiries of providers in relation to products that may meet your needs and to provide you with advice/guidance regarding the suitability of any product that may be available to you.



The arrangement of certain types of finance may involve disclosure by you to us of information relating to historic or current criminal convictions or offences (together “criminal disclosures”). This is relevant to loan related activities such as underwriting, claims and fraud management.

We will use any special category data and criminal disclosures in the same way as your personal data generally, as set out in this Privacy Notice.

#### **How do we collect your personal data?**

We will collect and record your personal data from a variety of sources, but mainly directly from you. You will usually provide information during the course of our initial meetings or conversations with you to establish your circumstances and needs and preferences in relation to your financial affairs. You will provide information to us verbally and in writing, including email.

We may also obtain some information from third parties, for example, credit checks, information from your employer, and searches of information in the public domain such as the voters roll. We may use technology solutions to assist in the collection of your personal data, for example software that is able to verify your credit status, but we will only do this if we have consent from you for us or our nominated processor to access your information in this manner. With regards to electronic ID checks we would not require your consent but will inform you of how such software operates and the purpose for which it is used.

#### **What happens to your personal data when it is disclosed to us?**

In the course of handling your personal data, we will:

- Record and store your personal data in our paper files, mobile devices and on our computer systems, for example websites, email, hard drives, and cloud facilities. This information can only be accessed by employees and consultants within the company and only when it is necessary to provide our service to you and to perform any administration tasks associated with or incidental to that service.
- Submit your personal data to Funders/ Lenders both in paper form and via secure email/portal. The provision of this information to a third party is essential in allowing us to progress any enquiry or application made on your behalf and to deal with any additional questions or administrative issues that lenders and providers may raise.
- Use your personal data for the purposes of responding to any queries you may have in relation to your instructions.

#### **Sharing your personal data**

From time to time your personal data will be shared with:

- Funders / Lenders
- Third parties who we believe will be able to assist us with your enquiry or application, or who are able to support your needs as identified. These third parties will include, but may not be limited to, our compliance advisers and lending specialists.

In each case, your personal data will only be shared for the purposes set out in this privacy notice, i.e. to progress your enquiry and to provide you with our professional services.



Please note that this sharing of your personal data does not entitle such third parties to send you marketing or promotional messages: it is shared to ensure we can adequately fulfil our responsibilities to you, and as otherwise set out in this Privacy Notice.

#### **Security and retention of your personal data**

Your privacy is important to us and we will keep your personal data secure in accordance with our legal responsibilities. We will take reasonable steps to safeguard your personal data against it being accessed unlawfully or maliciously by a third party.

We also expect you to take reasonable steps to safeguard your own privacy when transferring information to us, such as not sending confidential information over unprotected email, ensuring email attachments are password protected or encrypted and only using secure methods of postage when original documentation is being sent to us.

Your personal data will be retained by us either electronically or in paper format for a minimum of six years, or in instances whereby we have legal right to such information we will retain records indefinitely.

#### **Your rights in relation to your personal data**

You can:

- request copies your personal data that is under our control
- ask us to further explain how we use your personal data
- ask us to correct, delete or require us to restrict or stop using your personal data (details as to the extent to which we can do this will be provided at the time of any such request)
- ask us to send an electronic copy of your personal data to another organisation should you wish
- change the basis of any consent you may have provided to enable us to market to you in the future (including withdrawing any consent in its entirety)

#### **How to make contact with us in relation to the use of your personal data**

If you have any questions or comments about this document, or wish to make contact in order to exercise any of your rights set out within it please contact us via the contact details within this website and ask for the person responsible for data protection.

If we feel we have a legal right not to deal with your request, or to action it in different way to how you have requested, we will inform you of this at the time.

You should also make contact with us as soon as possible of you becoming aware of any unauthorised disclosure of your personal data, so that we may investigate and fulfil our own regulatory obligations.

If you have any concerns or complaints as to how we have handled your personal data you may lodge a complaint with the UK's data protection regulator, the ICO, who can be contacted through their website at <https://ico.org.uk/make-a-complaint/> or by writing to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.