

Broker Client - Customer Privacy Notice

Why should you read this document?

During the course of dealing with us we will ask you to provide us, usually via your broker or financial adviser with detailed personal information relating to your existing circumstances and your financial situation (**Your Personal Data**). This document is important as it 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. Your Personal Data may also identify you indirectly, for example, your employment situation, your physical and mental health history, or any other information that could be associated with your cultural or social identity.

In the context of providing you with assistance in relation to your mortgage or finance requirements 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
- Any pre-existing mortgage or finance products and the terms and conditions relating to these

The basis upon which our Firm will deal with Your Personal Data

When we speak with you or your broker or financial adviser about your mortgage or finance requirements 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 products 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 your broker or financial adviser, 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 mortgage or finance lenders, our Compliance Service Provider and other business service providers in relation to proposals we have put forward for consideration and your broker or financial adviser, or to make contact with you to seek feedback on the service you received.

On occasion, we will use Your Personal data 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.

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The basis upon which we will process certain parts of Your Personal Data

Where your broker or financial adviser asks us to assist you with your mortgage or finance needs, we will record and use Your Personal Data in order to make enquiries of mortgage or finance providers in relation to mortgage or finance products that may meet your needs.

If you have parental responsibility for children under the age of 13, it is also very likely that we will record information on our systems that relates to those children and potentially, to their Special Data.

The arrangement of certain types of mortgages may involve disclosure by you to your broker or financial adviser and therefore to us, of information relating to historic or current criminal convictions or offences (together "**Criminal Disclosures**"). This is relevant to mortgage or finance related activities such as underwriting, claims and fraud management.

We will use Special Data and any Criminal Disclosures in the same way as Your Personal Data generally, as set out in this Privacy Notice.

Information on Special Data and Criminal Disclosures must be capable of being exchanged freely between intermediaries such as our Firm, and mortgage or finance providers, to enable customers to secure the mortgage or finance that their needs require.

How do we collect Your Personal Data?

We will collect and record Your Personal Data from a variety of sources, but mainly directly from your broker or financial adviser. You will usually provide information during the course of your initial conversations with your broker to establish your circumstances and needs and preferences in relation to mortgages or other finance products. Your broker will provide information to us verbally and in writing, including by 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. If we use technology solutions to assist in the collection of Your Personal Data, for example software that is able to verify your credit status, we will only do this if we have consent from you for us 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 and on our computer systems. This information can only be accessed by employees and consultants within our Firm 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 mortgage or other finance lenders, both in paper form and on-line via a secure 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 any mortgage or finance you may take out, or to inform you of any developments in relation to those products and/or polices of which we might become aware

Sharing Your Personal Data

From time to time Your Personal Data will be shared with:

- Mortgage or finance 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, product specialists, estate agents, providers of legal services such as estate planners, conveyancing, surveyors and valuers (in each case where we believe this to be required due to your particular circumstances).
- Your broker or financial adviser if you have been introduced us by a broker or financial adviser who is guiding you through the finance application process, so that they can continue to advise you appropriately.

In each case, your Personal Data will only be shared for the purposes set out in this customer privacy notice, i.e. to progress your mortgage or finance 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 Customer Privacy Notice.

We do not envisage that the performance by us of our service will involve Your Personal Data being transferred outside of the European Economic Area.

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 by 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 of 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 our Firm 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: Frances Scanlan at The Coach House, Bentleigh Farm, Pitton, Salisbury, Wiltshire SP5 1EG.

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 on 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/global/contact-us/> or by writing to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.