

Customer Privacy Policy

PRIMIS Mortgage Network (the **Network, we, our, us**).

Thank you for taking the time to read this Privacy Notice. It is highly likely that you have been directed to this Privacy Notice through the course of your dealings with a member of our Appointed Representative Network (our **AR**).

We would like to take this opportunity to explain more about the role we play in the service that has been provided, or will be provided, to you by our AR. In doing so, we also explain that as a consequence of our AR providing a service to you, the Network will process information that relates to you. We have set out below the reasons why the Network needs to process your information, and your rights in relation to that processing.

What is the role of the Network when you have contact with our AR?

The Network is authorised and regulated by the Financial Conduct Authority (**FCA**). The Network is responsible for the quality of the advice that our AR provides to you in relation to your mortgage and/or insurance products, where those products are regulated by the FCA.

Being regulated by the FCA means that we are subject to a number of detailed rules and regulations that operate to ensure that you are treated fairly in your dealings with both us and our AR.

The Network is responsible for ensuring that our AR meets all applicable regulatory requirements in the course of providing you with advice.

What information will the Network process that relates to you?

During the course of your dealings with our AR you will be asked to provide detailed personal information relating to your existing circumstances, your financial situation and, in some cases, your ethnic origin, your health and family health history (together **Your Information**).

Your Information means any information describing or relating to you. Your Information may identify you directly, for example your name, address, date of birth, National Insurance number and the like. Your Information 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 our AR providing you with assistance in relation to your mortgage and/or insurance requirements Your Information 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);
- any pre-existing mortgage and/or insurance products and the terms and conditions relating to these;

Where you ask our AR to assist you with your insurance needs, in particular life insurance and insurance that may assist you in the event of an accident or illness, our AR will ask you information about your ethnic origin, your health and medical history (**Your Special Data**).

If you have parental responsibility for children under the age of 16 it is also very likely that our AR (and consequently us) will record information on our systems that relates to those children and potentially, to their Special Data.

The arrangement of certain types of insurance may involve disclosure by you to our AR of information relating to historic or current criminal convictions or offences (together “**Criminal Disclosures**”). This is relevant to insurance related activities such as underwriting, claims and fraud management.

Your Special Data and any Criminal Disclosures will be used by us in the same way as Your Information generally, as set out in this Privacy Notice.

The basis upon which the Network will deal with Your Information, Your Special Data and/or Criminal Disclosures

We have set out above that we have overall responsibility in law for the quality of the service that our AR supplies to you. This includes a responsibility to investigate and deal with any complaint you may subsequently make against our AR. The primary reason for Your Information, Your Special Data and/or Criminal Disclosures being processed by us is to ***enable us to comply with these legal obligations***.

Alternatively, we have the right to use Your Information, Your Special Data and/or Criminal Disclosures 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 lenders, insurance providers and our AR relating to the advice that has been provided to you, or to make contact with you to seek feedback on the service you received. We also provide our AR with access to systems and software to enable it to source quotations for certain types of insurance products that you may require. We will therefore process Your Information, Your Special Data and/or Your Criminal Disclosures to enable us to fulfil responses to enquiries for such quotations submitted by our AR on your behalf.

On occasion, we will use Your Information, your Special Data and/or Criminal Disclosures to enable us to meet any contractual responsibilities we may owe lenders or providers, our AR, or for wider compliance with any legal or regulatory obligation to which we might be subject, including any obligations we may have to you. This includes sharing Your Information and Your Special Data and/or Criminal Disclosures with all applicable regulators such as the FCA and the Information Commissioner.

When we process your Special Data and any Criminal Disclosures we do so on the basis that it is in the substantial public interest to be able to provide vital insurance products and as permitted by UK data protection related laws and regulations from time to time. Information on Special

Category Data and Criminal Disclosures must be capable of being exchanged freely between insurance intermediaries such as the Network, our AR and insurance providers, to enable customers to secure the important insurance protection that their needs require.

How does the Network collect Your Information, Your Special Data and/or Criminal Disclosures?

We will collect and record Your Information from a variety of sources, but mainly directly from our AR. You may provide information to us directly for example, when providing feedback on an AR or making a complaint. Alternatively we may receive information from mortgage lenders or insurance providers.

What happens to Your Information, Your Special Data and/or Criminal Disclosures when it is disclosed the Network?

In the course of handling Your Information, Your Special Data and/or Criminal Disclosures we will:

- record and store Your Information, Your Special Data and/or Criminal Disclosures on our systems run on secure servers. Your Information, Your Special Data and/or Criminal Disclosures will be accessed by authorised employees and consultants within, or engaged, by us as necessary for the purposes of supervision, training, quality audits, customer surveys and complaint handling or otherwise to comply with any other legal or regulatory obligation that we may have;
- use, and where appropriate transmit, Your Information, Your Special Data and/or Criminal Disclosures to respond to any request from the FCA, the Financial Ombudsman Service, HMRC, the Office of the Information Commissioner or any other regulatory, law enforcement or governmental body;
- need to access and process Your Information, Your Special Data and/or Criminal Disclosures to deal with enquiries received from mortgage lenders and insurance providers that relate to the service that our AR has provided to you, including the payment of any commission or fees to us that may be linked to the product you have taken out.

Security and retention of Your Information, Your Special Data and/or Criminal Disclosures

Your privacy is important to us and we will keep Your Information, Your Special Data and/or Criminal Disclosures secure in accordance with our legal responsibilities. We will take reasonable steps to safeguard against Your Information being accessed unlawfully or maliciously by a third party, accidentally lost, destroyed or damaged.

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 sent to us.

Your Information, Your Special Data and/or Criminal Disclosures will be retained by us either electronically or in paper format for a minimum of six years. As we have set out above, we have responsibility to ensure the suitability of advice or recommendations provided to you by our AR, and to respond to and investigate any complaint you may make. The rules and regulations of the FCA do not generally provide for any automatic time bar after which you would be prevented from making a complaint to us (the exception being payment protection insurance). We will therefore keep a record of products and services that have been provided to you for as long as we consider reasonably necessary to be able to discharge our obligations to you.

Your rights in relation to Your Information, Your Special Data and/or Criminal Disclosures

THE RIGHTS MARKED WITH A * ARE EFFECTIVE FROM 25 MAY 2018

You can:

- request copies of Your Information, Your Special Data and/or Criminal Disclosures that is under our control;
- ask us to further explain how we use Your Information, Your Special Data and/or Criminal Disclosures;
- ask us to correct, delete* or require us to restrict or stop using Your Information, Your Special Data and/or Criminal Disclosures (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 Information, Your Special Data and/or Criminal Disclosures to another organisation should you wish*.

Sharing and transferring Your Information, Your Special Data and/or Criminal Disclosures

From time to time Your Information, Your Special Data and/or Criminal Disclosures will be shared with or transferred to:

- our AR;
- mortgage lenders and insurance providers;
- contractors or suppliers who we may engage to assist us with any customer feedback exercises
- our professional indemnity insurers, brokers, claims handlers and legal advisers and another person who may provide professional services in connection with the handling of a complaint, litigation or investigation;
- any person we may engage in connection with any investigation to detect, prevent or investigate financial crime, including those that may be carried out by or in conjunction with mortgage lenders, insurance providers and regulators;
- LSL Property Services plc, the ultimate parent company of the Network, and any associated company who may provide services to the Network from time to time.

In each case for the purposes set out in this Privacy Notice, i.e. to enable us to comply with our legal obligations to you, to further our legitimate interests, where there is a substantial public interest and to detect or prevent financial crime.

These parties may be located in the UK or elsewhere in the world where different privacy laws may apply which may not offer the same level of protection as UK law. We only make these arrangements or transfers where we are satisfied that adequate levels of protection are in place to protect any information held in that country and that the service provider acts at all times in compliance with applicable privacy laws.

How to make contact with the Network in relation to the use of Your Information, Your Special Data and/or Criminal Disclosures

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:

Network Data Protection Officer: Kay Leslie

E-mail: dpo@primis.co.uk

If we feel we have a legal right not to deal with your request, or to action it in a 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 Information, Your Special Data and/or Criminal Disclosures, 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 Information, Your Special Data and/or Criminal Disclosures 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.

PRIMIS Mortgage Network is a trading style of each of Advance Mortgage Funding Limited and First Complete Limited

V2.0 August 2018