

## CUSTOMER PRIVACY NOTICE

### Who we are and why you should read this document?

We (Response Mortgage Services Ltd) will collect, use and store certain personal data about you. When we do so, we are required to comply with data protection regulation. For the purposes of those laws, we are a 'data controller' and therefore responsible for that personal data.

When you deal with us, we will ask you to provide detailed personal information relating to your existing circumstances, your financial situation and in some cases, your health and family health history (**'Your Personal Data'**). This document explains what we need to do with 'Your Personal Data' and the various rights you have in relation to it.

### What do we mean by "Your Personal Data"?

'Your Personal Data' is any information which describes or relates to your personal circumstances. It may identify you directly, (for example your name, address, etc) or indirectly (for example, your employment situation, your physical and mental health history, etc).

In order to assist you in relation to your mortgage and/or insurance requirements, we may collect the following 'Personal Data':

- Contact information – *address, email, phone numbers.*
- Identity information - *title, name, date of birth, gender, nationality, civil/marital status, national insurance number.*
- Employment information – *employment details and employment history.*
- Financial information - *remuneration information, (including salary / bonus schemes / overtime / sick pay / other benefits), bank account details, tax information, loans and credit commitments, personal credit history, sources of income and expenditure.*
- Health information – *health history, details of treatment and prognosis, medical reports. (Further details are provided below with regards to the processing we may undertake in relation to this type of information)*

- Other – *including data about criminal convictions or offences, lifestyle information.*
- Details of any vulnerability  
Details of your dependents and/or beneficiaries under a policy. ***(If you are providing information about another person, we expect you to ensure that they know you are doing so and are content with their information being provided to us. You might find it helpful to show them this Privacy Notice and if they have any concerns please contact us in one of the ways described below.)***
- Product details - *any pre-existing mortgage or insurance products and the terms and conditions relating to these*

### The basis upon which our firm will deal with 'Your Personal Data'

When we discuss your mortgage or insurance 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 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 mortgage lenders, insurance providers and our compliance service provider relating to the advice we have given to you, 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.

### The basis upon which we will process 'Special Category Data'

Where you ask us to assist you with, for example your insurance, in particular life insurance, and insurance that may assist you in the event of an accident or illness, we will ask you information about your ethnic origin, your health and medical history ('**Special Category Data**'). We will record and use 'Special Category Data' in order to make enquiries of insurance providers in relation to insurance products that may meet your needs and to provide you with advice regarding the suitability of any product that may be available to you.

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

The arrangement of certain types of insurance may require you to disclose to us information relating to historic or current criminal convictions or offences ("**Criminal Disclosures**"). This is relevant to insurance-related activities such as underwriting, claims and fraud management.

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

Information on 'Special Category Data' and Criminal Disclosures must be capable of being exchanged freely between insurance intermediaries such as our firm and insurance providers, to enable customers to secure the important insurance protection 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 you. You will usually provide information during the course of our initial meetings or conversations with you to establish your circumstances, needs and preferences in relation to mortgage or insurance. 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. If we use technology solutions to assist in the collection of 'Your Personal Data' (for example software to verify your credit status), 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 do 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 (*websites, email, hard drives, and cloud facilities*). This information can only be accessed by employees and consultants within our firm and only when 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 insurance product providers / mortgage lenders / commercial 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 insurance you may take out, or to inform you of any developments in relation to those products and/or policies of which we might become aware.

### Sharing 'Your Personal Data'

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

- Mortgage & insurance providers.
- Third parties who we believe will be able to assist us with your enquiry or application, or who are able to support your needs. 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 and conveyancers, surveyors.

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 insurance enquiry and to provide you with our professional services. This sharing of 'Your Personal Data' does not entitle the third parties to send you marketing or promotional messages. 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 to us.

'Your Personal Data' will be retained by us either electronically or in paper form for a minimum period of 6 years following the advice/service you receive from us, although your data could be held for a longer period where this may be needed to meet the requirements of our regulatory bodies.

#### 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).

We may not always be able to fully address your request, for example if it would impact the duty of confidentiality we owe to others, or if we are otherwise legally entitled to deal with the request in a different way.

#### How to contact 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:

Mr Andrew Quinn: 0113 2653759.

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 contact us as soon as possible if you become 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 at:

<https://ico.org.uk/global/contact-us/>

or in writing to:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF