

Privacy Policy

In order to use our service, it is a regulatory requirement that we collect enough data to comply with our "Know your customer" (KYC) obligations set out by our governing body the Financial Conduct Authority.

Our Contact Details

Name: Mortgage Matters Ltd.

Address: 2 The Mount, Pontefract, WF8 1ND

Phone Number: 0203 9680041

E-mail: info@mortgagehealthmatters.co.uk

As the controller of your data, Mortgage Matters LTD comply with Data Protection laws in the United Kingdom and the EU General Data Protection Regulation (GDPR). This Privacy Policy details how Mortgage Matters LTD processes your personal data.

The personal data we collect about you

Personal data collected, used, stored and transferred by us may include:

- Identity Data including forenames, last name, maiden name, date of birth, gender, marital status, and username or similar identifier
- Contact Data including home address, email address and telephone numbers
- Financial Data including banks statements, payment card details, savings, debts such as loans and credit cards, income & expenditure, employer & pension benefits, and other assets
- Special Category Data specifically medical history
- Transaction Data including payments made for products and services you have purchased from us
- Technical Data including internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices used to access the Mortgage Matters LTD website and our Customer Portal
- Profile and Usage Data including purchases made by you, feedback and survey responses, how you use our website, products and services
- Marketing and Communications Data including your preferences in receiving marketing from us and our business partners and your communication preferences

How we get the personal information and why we have it:

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- Direct interactions with an adviser in person, by post, phone (including call recordings and voicemail), email, videoconferencing or otherwise when sourcing and applying for mortgage or protection products, processing Identity, Contact and Financial categories of personal data.
- Automated technologies or technical interactions with our website, via the customer portal, by using the web enquiry form or the Find A Mortgage function, processing Identity, Contact, Financial and Technical categories of personal data.
- Third parties or publicly available sources (processing Identity, Contact and Financial categories of personal data) such as:
 - Estate agents with whom you may be interacting, but only with your consent;
 - New home builders, as a legitimate interest of the builder in order to assess affordability for the property;

We use the information that you have given us in order to:

Purpose / Activity	Type(s) of data	Lawful basis for processing
To initially engage with you to discuss your requirements	<ul style="list-style-type: none"> • Identity • Contact 	Consent
To process and deliver your application for a mortgage or protection product	<ul style="list-style-type: none"> • Identity • Contact • Financial • Special Category • Transaction • Marketing & comms 	Performance of a contract with you To comply with a legal obligation Necessary for our legitimate interest (to recover debts due to us)
To manage our client relationship with you which will include: <ul style="list-style-type: none"> • Create and maintain access to your customer portal account • Notifying you about changes to our terms or privacy policy • Customer reviews / surveys 	<ul style="list-style-type: none"> • Identity • Contact • Profile and usage • Marketing and comms 	Performance of a contract with you To comply with a legal obligation Necessary for our legitimate interest (to re-engage with you to review your existing mortgage / protection needs, and to maintain and improve customer service standards)

Purpose / Activity	Type(s) of data	Lawful basis for processing
<ul style="list-style-type: none"> Re-engagement when existing products nears expiry / review protection needs 		
To respond to case enquiries and input to & defend against complaints	<ul style="list-style-type: none"> Identity Contact Profile & usage Transaction Marketing & comms 	To comply with a legal obligation Necessary for our legitimate interest (to ensure that complains can be responded to accurately)
To perform an affordability check for a property on behalf of an Estate Agent or New Home Builder	<ul style="list-style-type: none"> Identity Contact Financial Profile and usage 	Necessary for our legitimate interests and of the New Home Builder / Estate Agent (to ensure that a property is affordable before proceeding with the purchase process)
To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	<ul style="list-style-type: none"> Identity Contact Technical 	To comply with a legal obligation Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	<ul style="list-style-type: none"> Identity Contact Profile and usage Marketing and comms Technical 	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics and other systems including AI and automated decision-making to	<ul style="list-style-type: none"> Identity Contact Financial 	Consent/Explicit Consent

Purpose / Activity	Type(s) of data	Lawful basis for processing
improve our website, products/services, marketing, customer relationships and experiences	<ul style="list-style-type: none"> • Special Category • Technical • Profile and usage 	Necessary for our legitimate interests (to analyse customer usage, update our website, to develop our business, and to inform our re-engagement and marketing strategy)

We may share this information with:

Type of recipient	Reason
Within Mortgage Matters LTD	Depending on your requirements, it may be necessary to share your personal data within Mortgage Matters LTD and specialist product providers, in order for suitably qualified advisers to source relevant products and services or to re-engage with existing clients
Lenders and protection product suppliers	To source and submit applications in order to conclude the contract for the mortgage / protection application and the ongoing servicing of these contracts.
External suppliers	Specialist IT system providers to deliver our service to you (including sourcing of products, providing continuing advice, sharing of documentation, payment processing, informing you about relevant products and services, service & advice quality checking and improvements, and to request feedback on customer service standards). It may also be necessary to share your personal data with non-affiliated companies who perform support services on our behalf including those that provide professional, legal or accounting advice to Mortgage Matters LTD.
Solicitors / Conveyancers	To update the firm of solicitors / conveyancers with whom you are interacting about the progress of your application and confirm your identity / proof of deposit
Estate agents / New home builders	To update the firm of mortgage / protection advisers, estate agents and home builders with whom you are interacting about the results of affordability checks and progress of your application.

Type of recipient	Reason
Licensed Credit Agencies	For the purposes of confirming your identity to comply with Anti Money Laundering requirements (TransUnion data processing information can be found in the privacy notice on the www.callcredit.co.uk website); to perform a credit assessment to assess your eligibility; to obtain a Lenders Decision In Principle; and as part of a full application.
Regulators	Sharing of information may be necessary to fulfil our legal obligations as a regulated profession, for example with the Financial Conduct Authority, to verify your identity and comply with Anti Money Laundering legislation, and otherwise co-operate with law enforcement, legal proceedings or regulatory authorities.
Others	Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

These companies are required to ensure appropriate security measures are in place and maintain the confidentiality of your personal data, and to use your personal data only in the course of providing such services and in accordance with Mortgage Advice Bureau instructions.

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

- **Your consent**

You are able to remove your consent at any time by contacting Julie Carty on 0203 9680041 or by email at info@mortgagehealthmatters.co.uk

How we store your personal information

Data will be collected and stored, in compliance with our obligations, on secure servers within the EU; in an encrypted format where possible.

Emails, for example, are not usually encrypted.

Your personal data will not be sold to any third-party companies.

Purpose of processing	Retention
Successful mortgage / protection applications	For the full mortgage or protection policy term plus a further 6 years, or for a period of 30 years for historical cases if the original term is not recorded
Withdrawn, stalled, incomplete and failed mortgage/ protection applications	2 years from the date the latest application was started, or 6 years from the application submitted date if application was submitted and subsequently rejected
Client Portal accounts	2 years from the date of last login if not proceeded to full application
Affordability assessments for new build property	2 years from Decision In Principle if affordability check does not proceed to a full mortgage application
Enquiry data obtained from third parties that do not result in an application	2 years from the date the lead was received from the Introducer

After these retention periods if there is no other on-going client relationship your personal data will either be securely deleted or anonymised so that it can be used for statistical purposes but without any method of identifying you individually.

Your data protection rights

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal information.

Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing - You have the the right to object to the processing of your personal information in certain circumstances.

Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at ***info@mortgagehealthmatters.co.uk / 0203 9680041 / 2 The Mount, Pontefract, WF8 1ND*** if you wish to make a request.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at ***info@mortgagehealthmatters.co.uk***.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

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

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>