

# Data Protection

## Our Contact Details

**Name:** Mortgage Matters Ltd.

**Address:** 5 New Forest Way, Leeds, England, LS10 4GH

**Phone Number:** 0203 9680041

**E-mail:** [info@mortgagehealthmatters.co.uk](mailto: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
<ul style="list-style-type: none"><li>• Re-engagement when existing products nears expiry / review protection needs</li></ul>		
To respond to case enquiries and input to & defend against complaints	<ul style="list-style-type: none"><li>• Identity</li><li>• Contact</li><li>• Profile &amp; usage</li><li>• Transaction</li><li>• Marketing &amp; comms</li></ul>	<p>To comply with a legal obligation</p> <p>Necessary for our legitimate interest (to ensure that complains can be responded to accurately)</p>

<p>To perform an affordability check for a property on behalf of an Estate Agent or New Home Builder</p>	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Financial</li> <li>• Profile &amp; usage</li> </ul>	<p>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)</p>
<p>To perform an affordability check for a property on behalf of an Estate Agent or New Home Builder</p>	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Technical</li> </ul>	<p>To comply with a legal obligation</p> <p>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)</p>

<p>To perform an affordability check for a property on behalf of an Estate Agent or New Home Builder</p>	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Profile and usage</li> <li>• Marketing and comms</li> <li>• Technical</li> </ul>	<p>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)</p>
<p>To use data analytics and other systems including AI and automated decision-making to improve our website, products/services, marketing, customer relationships and experiences</p>	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Financial</li> <li>• Special Category</li> <li>• Technical</li> <li>• Profile and Usage</li> </ul>	<p>Consent/Explicit Consent</p> <p>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)</p>

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](mailto:info@mortgagehealthmatters.co.uk)

## Our Contact Details

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](mailto: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\*\*](mailto: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\*\*](https://www.ico.org.uk)