



PRIVACY STATEMENT

(V3. 1/21)

We take your privacy very seriously and so the personal information you provide will always be treated in the strictest confidence. This statement sets out our stance on what information we collect, how we use it and your information rights.

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1. About Pink Dot Mortgages and how to contact us

Our registered address is

Pink Dot Mortgages Ltd,
Swatton Barn,
Badbury,
Wiltshire,
SN4 0EU

You can find out more about us on our website - www.pinkdotmortgages.co.uk.

To help ensure we meet all our obligations we have an appointed Data Protection Officer. If you have any questions or concerns about how your personal information is being used you can contact the DPO as follows:

Phone - 01793 740486

Email - info@pinkdotmortgages.co.uk

By writing to - The Data Protection Officer at the above address

You can also obtain information and advice from the Information Commissioner who is the independent regulator appointed by Parliament to oversee compliance with data protection and information rights: www.ico.org.uk

Pink Dot Is registered with the Information Commissioner (registration number Z981611X).

2. What information we collect and how we use it

Our core business is acting as a mortgage broker. Our research involves matching your financial profiles to UK Mortgage Lenders, to find the mortgage that suits your overall circumstances.

To enable us to conduct our research we initially ask you about:

- *your identity*
- *contact details*
- *nationality and residence status*
- *employment record*
- *your income and expenditure habits*

How you answer these initial questions will determine what other questions we may need to ask you. The reason for this being that different lenders serve different parts of the market and have different eligibility criteria. We will always explain the process to you and answer any questions you may have about why certain types of information may be needed.

When you apply for a mortgage through us we will also collect your direct debit details to pass on to your lender. If the products you select involve a cost, such as a valuation fee, we will ask for your payment information, to again pass on to your lender.

Mortgage lenders themselves are data controllers in their own right and have their own privacy statements. Lenders will use your information against their lending criteria and against Credit Reference Agencies and this may affect your credit score. We will always bring this to your attention as part of the process so that you are forewarned. We will also make you aware in advance when lenders are likely to debit any funds from your accounts.

2.1 Updating Your Details

If you are an existing customer, we may use the information we have on you to pre-fill forms when you apply for a new mortgage, but we will always check that these details are accurate and up to date.

2.2 Marketing and Market Research

We do not use your information for any form of direct marketing or market research.

If you have taken out a mortgage through us, we will contact you when your product is coming to an end to ensure that we can access the best rates on a new deal. If you do not want us to do this you can ask us at any time to mark your records 'do not contact'.

2.3 Money Laundering and preventing and detecting unlawful acts

If we believe that we have detected a risk of money laundering or fraudulent activity we are required by law to submit a Suspicious Activity Report to the National Crime Agency. The law also permits us to report suspected crime to the appropriate authorities. We are also required to disclose personal data where required to do so by law or by the order of a court. We have discretion to disclose personal data where this is necessary for protecting the public against dishonesty.

2.4 Our Website

If you use our website, we will collect information about the devices you're using or ask third parties to do this for us. This allows us to ensure that our website works properly, helps to keep it secure and helps us understand how people use our website. As this involves using technologies such as cookies, please read our Cookies policy (see Section 9).

2.5 Training and Testing

We do not use customer data for training or system testing separate from case management, and use dummy data for these purposes.

2.6 Information that we collect indirectly

When any of our customers apply for a mortgage, the law requires us to check their identity. This makes it harder for criminals to use financial systems, or to use false names and addresses to steal the identities of innocent people. Checking everyone's identity is an important way of fighting money laundering and other criminal activities. To confirm that you are who you say you are, we'll verify your name and address by asking you to provide us with documents to confirm these details.

2.7 Ancillary

We use the information we have about you to provide all the aspects of our service you would expect, such as contacting you to prompt you with reminders about renewals.

We may also disclose information where permitted by law in connection with the resolution and pursuit of legal rights and disputes or complaints.

3. What are the legal grounds for handling personal information?

The law says we must have a legal basis for processing personal data. There are six standard data processing grounds or conditions for processing personal data. We rely on the following conditions for the activities indicated.

3.1 Legitimate Interests

In most cases, you'll provide the information covered in Section 2 because you want to use our services. Ordinarily for a business, this would mean that the condition for processing is contractual. However, this condition only applies where a legal contract exists between the parties concerned. Because we act as an intermediary this condition is not available. We therefore rely on what is called the 'legitimate interests' ground for processing. The law provides we can use your information under this condition where our interest in using it is not outweighed by your privacy rights or interests.

This means that we can use your personal data only in ways you would reasonably expect and which have a minimal impact on your privacy, or where there is a compelling justification for the processing.

In the case of mortgage applicants the legitimate interest condition applies because you have requested the service in question and can withdraw at any time. We also rely on this condition to process any details joint mortgage applicants give us about the other applicants. Applicants should be aware that lenders will not proceed with any mortgage without the written consent of any occupant of the current property who is aged over 17. Where we rely on legitimate interests we think this is fair because we only contact existing customers or people who have contacted us directly and each communication provides an easy to use opt out.

3.2 Consent

In order to use your personal data on this basis your consent must be freely given, specific, informed and unambiguous. This puts you in charge by asking you to positively “opt in” to specific statement on the use of your personal information.

3.3 Explicit Consent

We need what is called explicit consent where we rely on consent to process what is called sensitive or special category personal data.

3.4 Complying with a legal obligation

- Money Laundering reports

3.5 Public Interests & Substantial Public Interest Tasks

- Processing health data in connection with vulnerable customers
- Reporting fraud and other suspected crimes to the appropriate authorities
- Suspicion of terrorist financing or money laundering
- Protecting the public against dishonesty
- Insurance and data concerning the health of relatives of an insured person.

3.6 Contract

- Processing personal data in connection with contracts that we hold with contractors, suppliers and staff.

4. Who we share your personal information with

To fulfill our contractual obligations, we share your personal data with mortgage lenders. Your personal data may also be transferred to the following authorised parties:

Third party organisations that provide IT services, administrative functions and support - we use third parties to support us in providing our services and to help provide, run and manage our internal IT and back office Client Management systems. For example, providers of information technology, cloud based software as a service providers, identity management, website hosting and management, data analysis, data back-up, security and storage services. The servers powering and facilitating that cloud infrastructure are located in secure data centers around the world, and personal data may be stored in any one of them.

Auditors and other professional advisers - we may engage auditors and professional advisers to perform specific work that helps us meet our legal, regulatory and statutory responsibilities. Any auditors or professional advisers that we use will have contractual arrangements and security mechanisms in place to protect data and to comply with our data protection, confidentiality and security standards

Regulatory Bodies - we may disclose information to either the Financial Service Ombudsman or the Financial Conduct Authority where they request this to resolve complaints, or our auditors in connection with their duties

If you no longer wish us to share your data, you may withdraw your consent at any time.

5. Where in the world do we send information?

We do not send any information outside of the UK. As a UK based company, all the personal information we process is protected by European data protection standards.

6. Your Information Rights

The following is a list of the rights you have under Data Protection legislation. Not all these rights apply in all circumstances but we will be happy to explain this to you at the time you ask. Independent advice about your rights can be obtained from the Information Commissioner (see Section 1.). All these rights can usually be exercised free of charge and generally speaking we will respond within one month. If we need longer to respond we will explain why this is necessary within the one month period and tell you more about any rules that affect how you can exercise your rights.

Informed - You have the right to be informed in a concise, transparent, intelligible and easily accessible way about how we use your personal information. We will explain why we need information at the time we collect information from you and make sure that all our data collection forms and letters point you to this Privacy Statement.

Access - You can make what is called a subject access request for a copy of the information we hold about you. We must also tell you why we have the information, what types of information we collect and who we share it with.

Portability - You have the right in some circumstances to have the data you have provided to us sent to you or provided to another person or business in an electronic machine readable format. Where this applies we will download the information and send it as a pdf file.

Correction - You have the right to have inaccurate information corrected and incomplete information completed. If the information we need to deliver our services to you changes please tell us about this as soon as possible.

Object - You will normally have the right to object to how we intend to use your information based on your individual circumstances. You have an absolute right to object to us using your personal information for the purpose of direct marketing at any time.

Restriction - If you have objected or complained about how we have used your information or its accuracy you may not want it to be deleted until your complaint has been resolved. In certain circumstances you can ask for your data to be restricted or not used until these issues are resolved.

Erasure - You have a right to have some or all of the information we hold about you erased in some circumstances. This is known as the right to be forgotten.

Automated - This right only applies where a decision which has a legal or similar effect is intervention. Where such decisions are made individuals have a right to ask for the decision to be reviewed and the data controller must make sure appropriate safeguards are in place. However, we do not make automated decisions about any of our clients.

Consent - If we are processing your personal information on the basis of your consent, you have the right to withdraw that consent at any time.

Complaint - You have a right of complaint to the Information Commissioner (the Supervisory Authority) if you consider any aspect of our use of your personal information infringes the law. Section 1 provides the contact details.

However, we will want to put matters right wherever we can and we would hope that you will contact us in the first instance. You can exercise your data protection rights or complain about how we are processing your personal information by contacting the Data Protection Officer as set out in Section 1. If your complaint is about the administration, or terms and conditions of a mortgage recommended by us but provided by a lender, you may need to contact them about it. If needed, we'll forward details of your complaint to the lender concerned, as well as giving you their contact details.

7. How we keep your personal information secure

We understand how important it is to keep your personal information secure. We use a variety of technologies and procedures to protect your personal information from accidental or unlawful breaches of security. These include physical, organisational, and technological measures.

8. How long do we keep your personal information for

To ensure that we are able to meet our legal, regulatory and customer obligations, we will retain client information for the following time periods:

- If you become a client of a lender as a result of the advice we provide to you, we will keep a full record of your interactions with us for the lifetime of the mortgage plus a reasonable period to enable us to meet our regulatory obligations to evidence we gave suitable advice. In practice this means that we will keep your records for no longer than 35 years after your last transact with us
- If, as a result of our advice, you make an application to a lender but do not ultimately become a client of that institution, we will keep a full record of your interactions with us for 6 years, to meet our obligations under UK Money Laundering regulations.
- If we collect personal information from you, but are unable to provide you with suitable mortgage advice, then we will keep a full record of your interactions with us for 2 years to facilitate an easier interaction between us if you re-engage our services within this period.

9. Use of Cookies

At a basic level, cookies will:

- allow our website to work properly, and help keep it secure
- help us understand how people use our website
- make the site easier to use, by remembering information that you've entered
- improve your experience by showing you information that's relevant to you.

9.1 The types of cookies we use :

Necessary cookies - these cookies let you move around our websites and use all the features. These cookies also help keep your online session secure.

Performance cookies - these simply help us improve the way our website works. They tell us how people use each page, which ones are viewed most often, or whether any errors occurred.

9.2 Consent

By using our website, you're consenting to us using cookies in the ways described above. But if you change your mind, you can alter your cookie settings at any time through your browser settings.

9.3 Changing your cookie settings

We recommend that you don't change your cookie settings, as blocking some or all of them may affect how well our website performs for you. But if you do decide to change them, you can do this through your browser. Each browser works in a different way, so a good place to start is by searching 'cookie settings' in your browser's help section.

9.4 How to Delete Cookies

To remove or prevent cookies being stored on your computer in the future, please refer to your internet browsers instructions.

10. Changes to this Privacy Statement

We will continuously refine this Privacy Notice to make sure we are complying with our obligations to be transparent about how we use your personal information. If we make any changes to how we process your personal information in ways that you would not reasonably expect, we will contact you and bring these changes to your attention.