

Privacy Notice

Thank you for taking the time to read this Privacy Notice.

PRIMIS Mortgage Network (the network) and its Appointment Representatives (AR) members are committed to protecting your personal information. It is important to us that you understand what data we collect, why we collect it and what we do with it.

Who is collecting your personal information?

The Network and our AR Firm Blue Herring Mortgage & Protection Services Ltd are each data controllers for the purposes of data protection legislation in their own right.

The AR will be your primary contact for the provision of advice and related application process.

The Network is authorised and regulated by the Financial Conduct Authority (FCA). The Network is responsible for the quality of advice that our AR provides you in relation to your mortgage and/or insurance products, where those products are regulated by the FCA together with ensuring that our AR meets all applicable regulatory requirements in the course of providing you with advice.

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 us both and our AR.

Why do we collect your personal information?

Everyone's circumstances are different. We want to provide you with the most appropriate advice in view of all your circumstances, and to do that we need a full picture of what your circumstances are. Put simply, if we are unaware of something then we cannot take it into account when advising you, and our advice may not be appropriate.

Similarly, if you are applying for a product such as a mortgage, we will need to collect personal information from you to enable us to fill in the application form on your behalf. This information is necessary to enable us to provide you with the services we have agreed with you.

In addition to this, we have to fulfil various legal and regulatory requirements, for example we must ask you to verify your identity with the appropriate documentation in order to comply with regulations designed to combat financial crime. We are regulated by the Financial Conduct Authority and the Information Commissioner's Office, and also have responsibilities to the Financial Ombudsman Service, the National Crime Agency and other law enforcement agencies such as the Police and HM Courts and Tribunal Service.

In view of the above, if you do not provide the information that we require, we may be unable to provide you with our services.

How we collect your personal information?

Most of the personal information that we hold about you will be information that you provide to us, for example the information you provide to us about your circumstances to enable us to make a personal recommendation to you. This will usually be recorded in writing or by way of retained documentation; if you telephone our offices we may record the call.

There may be occasions when we receive information about you from another customer; for example where details of a joint account are disclosed. We always ask the person disclosing such information to ensure that the other person affected has given permission for such information to be disclosed. If

you need to disclose any information about another person, including any child over the age of 13 years old, please ensure that you obtain that person's agreement in advance.

Sometimes we will receive information about you from other third parties. This may be because you have given permission to a lead generator or introducer to pass on your details to us so we can contact you to offer advice. Alternatively it may be that we need to ask a third party such as your accountant employer, bank or tax office to provide missing information or verify information that you have provided to us.

We will also receive information forwarded from your lender or insurer, usually in relation to your product or application.

In the event that we receive sensitive information about you, such as that relating to your ethnic origin, trade union membership, political or religious beliefs, sexually or genetic/biometric data, we will always ask you to agree that we can use and retain that information.

Finally, in the unfortunate event that are you dissatisfied with our service or there is some other dispute between us, we may receive information about you from a legal representative acting on your behalf, from the Financial Ombudsman Service or from another individual connected with the matter.

How long do we keep your personal information?

In the event that you use our services to arrange a product, such as a mortgage or an insurance policy, we will retain your information for a minimum of six years beyond the time that the product is expected to expire. Information relating to equity release and pension transfers/conversions/opt out will be kept indefinitely. This is to ensure that we are able to respond to any complaint, claim or regulatory enquiry.

If you have opted out of receiving promotional material from us, we will retain your details until you opt out or unsubscribe.

How do you find out what information we hold about you?

You have the right to obtain a copy of the personal data that we hold in relation to you. To view a copy free of charge, please write to:

Data Protection Officer

PRIMIS Mortgage Network

Ground Floor, 3700 Parkside

Birmingham Business Park

Solihull

B37 7YG

DPO@personaltouchfs.com

Please ensure that you provide evidence of your identity such as a copy of your password when writing, so we can be sure that the request has gone to the right person.

How do we use your personal information? Will we share it with anyone else?

We use your personal information to provide you with advice and to communicate with lenders and insurers on your behalf, in accordance with our agreement with you. We may, with your consent, also use your information to carry out a credit check, or communicate your consent to the lender or provider to allow them to do this as part of your application. Blue Herring Mortgage & Protection Services Ltd may use your personal information to provide you with advice and to communicate with lenders and insurers on your behalf.

In addition to this, where necessary, we may need to use your personal information to fulfil our contractual obligations to advisers, lenders and insurers. For example, your surname and policy number will be disclosed on the financial statements produced setting out what commission is payable. We will always seek to minimise the information shared in this way, and ensure that it is more widely distributed than absolutely necessary.

As part of the regulated sector we have particular responsibilities in relation to the prevention and detection of financial crime. This means that it is possible that your information may be used as part of an investigation designed to identify any wrong-doing or breach of regulation. This may involve sharing some of it with other regulated financial institutions and law enforcement agencies but we will seek to minimise such sharing and will ensure that information is only released to appropriately authorised individuals who we can trust to keep it confidential.

We appreciate that you may not be expecting your information to be used in this manner, particularly if you are not involved in any wrong-doing yourself. However, we consider the prevention and detection of financial crime to be of fundamental importance, both for us and a society as a whole. Please be assured that all such investigations are carried out by trained staff and are subject to specific procedures and safeguards to ensure that any inconvenience to innocent parties is minimised.

If you are dissatisfied with the service provided to you and you (or anyone acting on your behalf) make a complaint or claim about it, we may access your personal information, including any fact find and suitability letter in order to respond to that claim. We believe that most customers would expect us to consider all the relevant documents, and would recognise that we have a legitimate interest in both ensuring that our customers are properly looked after, and in resisting any unjustified claims. Information released may include sensitive personal data, but we will ensure this is only processed so far as necessary for the establishment, exercise or defence of legal claims, including relevant pre-action correspondence.

Similarly, PRIMIS Mortgage Network considers it to be a legitimate aim of the business to seek recompense from any advisor or other financial professional concerned where conduct has fallen below the high standards we require. Where we seek recompense from an advisor or third party following resolution of a claim from a former customer, it will be necessary to demonstrate that the customer claim in question is genuine. In order to do this we may have to disclose some personal information about the customer concerned, such as a copy of the complaints letter and our response to that complaint.

We will always seek to keep the information shared to the minimum reasonably possible. We would, in particular, not usually expect the information to be provided to extend beyond information relevant to the complaint file. We appreciate that customers may not be happy with their details being disclosed as part of a dispute in which they were personally not involved, but equally we anticipate that most customers will have expected this information to be disclosed to the adviser and perhaps third parties such as the Financial Ombudsman Service and HM Courts and Tribunals Service as part of the complaint process itself. We therefore take the view the small possibility of this causing any harm to you is outweighed by the positive aspects of ensuring that those giving bad advice or acting in breach of regulations should cover any related costs.

PRIMIS Mortgage Network is part of LSL Property Services Group, the ultimate parent company of which is LSL Property Services plc. It is in the interest of LSL and PRIMIS Mortgage Network to ensure that a high standard of service and compliance is retained across the group, and therefore we may share your personal data with other companies within the LSL Group for this purpose.

We will always ask for your consent before contacting you for marketing purposes. You will be asked to complete a form setting out your preferences, and it is important to us that you understand that you are free to withdraw at any time. This may be done by contacting:

Data Protection Officer

PRIMIS Mortgage Network

Ground Floor, 3700 Parkside

Birmingham Business Park

Solihull

B37 7YG

DPO@personaltouchfs.com

Where do we store your personal information

We may store your personal information in paper format in secure cabinets at our office premises.

We will also retain electronic records relating to you in accordance with our data protection policies. Our servers 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.

Deleting your personal information

You can request us to delete or anonymise all personal information relating to you. This is sometimes known as the right to be forgotten. Please forward any request to:

Data Protection Officer

PRIMIS Mortgage Network

Ground Floor, 3700 Parkside

Birmingham Business Park

Solihull

B37 7YG

DPO@personaltouchfs.com

There may be circumstances where we are unable to delete some or all of your personal information, for example due to our regulatory and legal obligations. In every case a response will be provided to you.

Your right to lodge a complaint

You have the right to lodge a complaint with the Information Commissioner's Office (ICO) if you believe your personal data has been mishandled. This can be done at <https://ico.org.uk/concerns/>. The ICO are legally obliged to inform you of the progress and outcome of your complaint.

Get in touch with our Data Protection Officer

If you have any queries in relation to how we treat your personal information, wish to update the information we hold on you or wish to object to our use of your information set out in this policy, please feel free to contact us at:

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