Privacy Notice

Roisin Monaghan (our **Firm**, **we**, **our, us**) is an Appointed Representative of PRIMIS Mortgage Network, a trading name of our Principal, First Complete Ltd, which is authorised and regulated by the Financial Conduct Authority (the **Network**).

Why are we asking You to read this document?

During the course of dealing with us we will ask You to provide us with detailed personal information relating to Your existing circumstances, Your financial situation and, only in relation to some products or services, Your health and family health history (**Your Information**). We would like to e**xplain to You what we will do with Your Information**, and the various rights You have in relation to **Your Information.**

What do we mean by "Your Information"?

Your Information means any information describing or relating to You. Your Information may identify You directly, for example Your name, address, date of birth, National Insurance number and the like. Your Information may also include information which, when used in conjunction with other known facts, could be used to identify You indirectly, for example Your employment situation, and information that could be associated with Your cultural or social identity.

In the context of providing You with assistance in relation to Your mortgage and/or insurance requirements the types of Information we may seek may include:

- Title, names, date of birth, gender, nationality, civil/marital status, contact details, addresses and documents that are necessary to verify Your identity
- Employment and remuneration information, (including salary/bonus schemes/overtime/sick pay/other benefits), employment history
- Bank account details, tax information, loans and credit commitments, personal credit history, sources of income and expenditure, family circumstances and details of dependents
- Any pre-existing mortgage and/or insurance products and the terms and conditions relating to these
- In certain circumstances we may ask for or, where relevant, You may wish to provide us with details of Your health status and history, details of treatment and prognosis, medical reports (further details are provided below specifically with regard to the processing we may undertake in relation to this type of sensitive personal information)

The basis upon which our Firm will deal with Your Information

In order to process Your data we are required to have one or more lawful bases for doing so. We rely upon the following three.

When we speak with You about Your mortgage and/or insurance requirements we do so on the basis that a ***contract for the supply of services*** is in place between us. **In order for us to perform that contract**, and to arrange the products You require, we have the right to use Your Information including sharing it with the Network and relevant third parties including mortgage lenders and insurance providers.

Alternatively, we have the right to use Your Information provided it is in our ***legitimate business interest to do so and Your rights are not affected***. For example, as we operate a mortgage brokerage business it is in our legitimate interest to process Your Information to respond to requests from mortgage lenders, insurance providers and the Network relating to the advice we have given to You, or to make contact with You to seek feedback on the service You received.

Finally, we may also process Your Information ***to enable us to operate in compliance with any legal or regulatory obligation to which we are subject including dealing with regulators such as the FCA, ICO and FOS.***

The additional basis upon which we will process certain types of Your Information known as Special or Sensitive Data.

Where You ask us to assist You with Your insurance needs, in particular life insurance and insurance that may assist You in the event of an accident or illness, we will ask You for information about Your ethnic origin, Your health and medical history (**Your Special Data)**. We (and consequently the Network) will record and use Your Special Data in order to make enquiries of insurance sourcing specialists and 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.

The arrangement of certain types of insurance may involve disclosure by You to us of information relating to historic or current criminal convictions or offences (together "**Criminal Disclosures**"). This is relevant to insurance

If You are seeking insurance products for You and Your family and have parental responsibility for children under the age of 16 it is also very likely that we (and consequently the Network) may record information on our systems that relates to those children and, if relevant, to their Special Data.

When we process Special Data and any Criminal Disclosures for the purpose of insurance provision we do so on the basis that it is of substantial public interest to be able to provide vital insurance products as well as permitted by UK data protection-related laws and regulations from time to time. 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. Processing such information is therefore exempt from the requirement to ask for Your consent.

Non-Insurance Products

If You provide us with Special Data in any other context than seeking insurance protection products, for example describing a disability You may have which is relevant to Your mortgage and the type of home You are purchasing or relevant to the manner in which You would like us to communicate with You e.g. You ask us to supply Your documentation in braille, then we will ask You for Your explicit consent before we can record that information. If You decline to allow us to do so but it is relevant then this could affect how we provide our services to You and in some cases result in unsuitable products or methods of communication being provided.

How do we collect Your Information?

We will collect and record Your Information 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 and needs and preferences in relation to mortgages and 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 Information, such as software that is able to verify Your identity on-line or to access Your credit status and/or bank account entries, then You may be required to provide Your express consent for us or our nominated processor to access Your information in this manner, and details of how such software operates will be provided to You prior to the activation of the service.

What happens to Your Information when it is disclosed to us?

In the course of handling Your Information we will:

- record and store Your Information in our paper files, mobile devices and on our computer systems (*websites, email, hard drives, cloud facilities*) and it will be accessed by employees and consultants within, or contractors engaged, by our Firm as necessary to provide our service to You and to perform any administration tasks associated with or incidental to that service

- submit Your Information to a credit reference agency, insurance sourcing specialists, mortgage lenders and/or insurance product providers, both in paper form and on-line via mortgage lender/insurance provider systems, in order to identify suitable products, undertake preliminary identity checks and affordability assessments, progress any enquiry or application made on Your behalf and to deal with any additional questions or administrative issues that mortgage lenders and insurance providers may raise

- input Your Information, along with full details of the mortgage and/or insurance, discussed with You or which You have taken out, to the computer systems of and applications and software operated by or on behalf of the Network

- use Your Information for the purposes of responding to any queries You may have in relation to any mortgage product or insurance policy You may take out, or to inform You of any developments in relation to those products and/or polices of which we might become aware

Sharing and transferring Your Information

From time to time Your Information will be shared with or transferred to:

- the Network for the purposes of regulatory compliance

- Experian for the purposes of identity checks and affordability assessments

- to mortgage lenders and insurance providers to enable them to consider Your application

- third parties who we believe will be able to assist us with Your enquiry or application, or who are able to support Your needs as identified, such third parties will include but may not be limited to, insurance sourcing specialists, mortgage and/or insurance providers and those within the Network or 3rd party data processors contracted by the Network for the purposes of providing ancillary services and other Appointed Representatives of the Network), estate agents, introducers, providers of legal services such as conveyancing, surveyors and valuers (in each case where we believe this to be required due to Your particular circumstances).

In each case for the purposes set out in this Customer Privacy Notice, i.e. to progress Your mortgage and/or insurance enquiry and to provide You with our professional services.

Please note that this sharing of Your Information does not entitle such third parties to send You marketing or promotional messages: it is shared for the purpose of ensuring we can adequately fulfil our responsibilities to You pursuant to the contract, and as otherwise set out in this Customer Privacy Notice.

These parties 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 have contracts in place and 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.

The basis upon which the Network will deal with Your Information, Your Special Data and Criminal Disclosures

The Network is authorised and regulated by the Financial Conduct Authority (**FCA**). The Network is responsible for ensuring the quality of the advice that our Appointed Representative provides to You in relation to Your mortgage and/or insurance products, where those products are regulated by the FCA. In the course of doing so, the Network will also process Your Information generally, including Your Special Data and Criminal Disclosures.

Unlike this Firm, the Network does not have a direct contract with You. Instead, it will rely upon the lawful bases of its legitimate interest in running a mortgage and insurance network and compliance with its legal and regulatory obligations.

In the course of handling Your Information and Your Special Data/Criminal Disclosures the Network will:

- record and store Your Information and Your Special Data/Criminal Disclosures on its systems run on secure servers. Your Information and Your Special Data/Criminal Disclosures will be accessed by authorised employees and consultants within, or engaged, by it as necessary for the purposes of supervision, training, quality audits, customer surveys and complaint handling or otherwise to comply with any other legal or regulatory obligation the Network may have

- use, and where appropriate transmit, Your Information and Your Special Data/Criminal Disclosures to respond to any request from the FCA, the Financial Ombudsman Service, HMRC, the Office of the Information Commissioner or any other regulatory, law enforcement or governmental body, internal or external auditors and to seek professional advice to comply with any other legal or regulatory obligation the Network may have

- need to access and process Your Information and Your Special Data/Criminal Disclosures to deal with enquiries received from mortgage lenders and insurance providers that relate to the service this Firm has provided to You, including the payment of any commission or fees to us that may be linked to the product You have taken out The basis of this processing is the legitimate interest of the Network, allowing it to meet contractual requirements and maintain accurate records.

- use, and where appropriate transmit, Your Information to third-party data providers to assist in ensuring the accuracy of data and its quality. This may include, for example, comparing address data against known records. The basis of this processing is the legitimate interest of the Network, allowing it to meet legal requirements and maintain accurate records.

- use Your Information to generate insights relating to customer activities. This will help the Network to better understand the overall activities of our customers and improve to better meet both customer needs and the needs of its Appointed Representatives. The basis of this processing is the legitimate interest of the Network.

Your Information and Your Special Data/Criminal Disclosures will be retained by the Network either electronically or in paper format for a minimum of six years and possibly for a longer period where this is required to enable it to fulfil its legal and regulatory obligations.

Please note that the above information is a summary of the Network Privacy Policy for customers. If, You wish to understand in more detail what the Network will do with Your Information and Special Data/Criminal Disclosures then please visit: https://www.primis.co.uk/index.php/terms-and-conditions/

Security and retention of Your Information

Your privacy is important to us and we will keep Your Information secure in accordance with our legal responsibilities. We will take reasonable steps to safeguard against Your Information being accessed unlawfully or maliciously by a third party, accidentally lost, destroyed or damaged.

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 sent to us.

Your Information will be retained by us either electronically or in paper format for a minimum of six years, or if longer than six years, the duration of this Firm's relationship with You.

Your rights in relation to Your Information

You can:

- request copies of Your Information that is under our control
- ask us to further explain how we use Your Information
- ask us to correct, delete or require us to restrict use of or stop using Your Information (details as to the extent to which we can legally refuse to comply with such requests will be provided at the time of any such request)
- ask us to send an electronic copy of Your Information 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)

How to make contact with our Firm in relation to the use of Your Information

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:

Roisin Monaghan

Mobile 07799834817

roisin@rmonaghan.co.uk

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 make contact with us as soon as possible on You becoming aware of any unauthorised disclosure of Your Information, 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 Information or Your Special Data/Criminal Disclosures You may lodge a complaint with the UK's data protection regulator, the ICO, who can be contacted through their website at https://ico.org.uk/global/contact-us/ or by writing to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.