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Purpose	Lawful Basis for Processing
Carrying out due diligence on our clients and performing risk assessments. This includes carrying out standard due diligence checks in relation to financial affordability for the mortgage and insurance products we recommend to you.	Necessary to comply with legal obligations to which we are subject. Our legitimate business interest to assess the risk associated with providing you with our services. When processing sensitive personal data, we do so with your explicit consent.
Legal and regulatory compliance and compliance with law enforcement requests. This includes biometric facial recognition to confirm your identity, other checks and monitoring transactions for the purpose of preventing and detecting crime and to comply with laws relating to money laundering, and fraud. Also, sharing information on suspected financial crimes, fraud and threats with law enforcement and regulatory bodies.	Necessary to comply with legal obligations to which we are subject. When processing sensitive personal data, we do so with your explicit consent.
Providing our mortgage and insurance advisory and administration services to you, covering any services we provide to you as a private client	Necessary for the performance of the contract agreement to which you are a party.
Maintaining a record of and monitoring clients that consider themselves to be or are considered to be vulnerable.	Necessary to comply with FCA guidance on the fair treatment of vulnerable customers. When processing sensitive personal data, we do so with your explicit consent which can be withdrawn at any time.
Managing and developing our relationship with you. This includes providing account management, contacting you for feedback and inviting you to participate in customer satisfaction surveys.	Our legitimate business interest to develop our relationship, collect your feedback, assess your level of client satisfaction and to improve our services.
Sending you marketing about our services, our news and events. This	Our legitimate business interest to send you marketing and promotional

includes sending you our news emails, information about our services, related information which may be of interest to you and to invite you to our events.	materials from time to time. Where we have obtained your consent to send marketing, we rely on such consent as the legal basis. You can tell us to stop sending you marketing information at any time by objecting or withdrawing your consent. You can do so by contacting us at compliance@jlmms.co.uk or by using the unsubscribe link in any marketing email you receive from us.
Internal management, administrative and organisational purposes. This includes maintaining internal records and carrying out other business administration tasks.	Our legitimate business interest to process your personal data to manage and improve our business processes.
Statistics and other data analysis. This includes creating forecasts and business plans, improving our services and developing new services.	Our legitimate business interest to process your personal data to develop and improve our business through aggregated and anonymised reporting and analysis.
Sharing data with entities in our group. This includes sharing client records and results of due diligence with our Appointed Representative entities.	Our legitimate business interest to identify and develop shared clients across our network of advisers and to utilise existing due diligence and risk assessment information when providing our clients with services.
Sharing data with third parties, including those who process personal data on our behalf.	Our legitimate business interest to share your data with trusted third parties who provide us with services relevant to our provision of services to you, including professional advisers, screening service providers and IT service providers.