



**TRANSPARENT SPECIALIST**  
FINANCE LIMITED

## Legal & Privacy Notice

### LEGAL INFORMATION:

This Privacy Notice sets out what information Transparent Specialist Finance will collect about you and how we use and protect that information.

This Privacy Notice applies to the processing of personal data of all applicants who are party to the loan application. By progressing your enquiry, you are confirming that you (and any co-applicant) agree to the conditions set out in this Privacy Notice and that you have permission to provide personal data on behalf of your co-applicant.

This Privacy Notice was last updated 01.03.2020 We may make changes to this Privacy Notice from time to time. If we make any significant changes to the way we use your personal information that may impact your data rights, we will notify you.

Calls are recorded for training and monitoring purposes.

This Legal and Privacy Notice, and your access to and use of our website is governed by and interpreted in accordance with the laws of England and Wales.

### ABOUT TRANSPARENT SPECIALIST FINANCE LTD:

We are a broker not a lender specialising in Investment Property Loans which does not require us to be authorised or regulated by The Financial Conduct Authority (FCA).

- Registered in England and Wales: 12429128
- Registered Office: 10 Honours Mead, Howard Agne Close, Bovingdon, HP3 0DA
- Registered with the Information Commissioner's Office - ZA650316

### WHAT INFORMATION DO WE COLLECT ABOUT YOU:

During the loan enquiry / application process, we may collect personal and financial information from you including (but not limited to):

- name, address history & contact information (telephone number(s) and email addresses); date of birth, marital status & nationality;
- property details and value (including 2<sup>nd</sup> homes and Buy-to-lets where relevant);
- household Income, employment type and history;
- details about your monthly expenditure, financial circumstances and requirements; and
- credit and mortgage information including credit reference agency data.

## SPECIAL CATEGORIES OF DATA:

We do not request 'special categories' of data (health / medical records, etc...) during the application process, however, if sensitive information is provided to us, we will ask for your explicit consent prior to recording it. As part of application process, the lender may invite you, on a voluntary basis, to disclose information that would enable them to assist you in the loan process in making an informed borrowing decision, and to ensure its lending decision is informed and responsible.

## HOW DO WE COLLECT THE INFORMATION ABOUT YOU, AND WHO PROVIDES IT?

Your data may be provided to us by:

- You or your co-applicant on the phone, emails and/or in the form of physical documents;
- Your Introducing Financial Adviser, Mortgage Broker, Solicitor or Estate Agent acting on your behalf.

Alternatively, we may request your personal data from relevant third parties, for example; property surveyors, existing mortgage providers or your solicitor.

## WHY WE COLLECT YOUR INFORMATION AND HOW DO WE USE IT?

1. **In order to provide our service** – (in legal speak, as a necessity to **perform our contract with you**), we will process your personal data to:
  - a) Assess eligibility and suitability of loan products offered by lenders on our panel;
  - b) Process your application and arrange its completion;
  - c) Keep your Introducer (if any) informed about the progress of your loan application; and
  - d) Verify your identity.

Such processing is a requirement of the service we provide in sourcing and arranging the finance you have requested. If you do not agree to how we will use your information we will not be able to provide our service.

2. **In order to comply with the laws and regulations that apply to TLE**, for example:
  - a) to inform fraud prevention and/or law enforcement agencies where fraud or money laundering is identified or suspected; or
  - b) to obtain or retain appropriate records, for example evidence of:
    - Suspected fraud or money laundering;
    - Proof of your identity;
    - Complaints investigations and outcomes.
3. **In the course of running our business** – (in legal speak, where we have a **legitimate interest** to do so –i.e. processing that isn't strictly necessary for providing our service but is important for us as a business), including:
  - a) to improve our products and services;
  - b) to record and respond to complaints;
  - c) to generate statistical analysis and research; and
  - d) where applicable, to contact and inform you of the end of your loans term or initial rate period.
4. **Where you have given your consent**– we will ask for your consent for us to keep you informed about service and products and updates to them.
5. **Where there is a vital interest to do so** - In other words we may pass your information onto relevant agencies such as the Police where we believe there is a risk to life.

## WHO MIGHT WE SHARE YOUR INFORMATION WITH:

### **Prospective Lenders**

We will share some or all of the information obtained during the application process with prospective lenders in order to assess your eligibility and process your application to completion.

Where your personal data has been shared with a lender, they will process the data in line with the conditions of this notice, otherwise, the lender will inform you of how they process your personal data.

We may need to contact your mortgage provider, property surveyors, accountant, and/or any other relevant third party, in order to gather evidences that we need to support your application as required by lenders' criteria. The information that is provided to each is limited to only what is required to grant the information request.

### **Fraud prevention agencies**

If you give us false or inaccurate information and we suspect or identify fraud, we will record this and may pass this information to fraud prevention agencies and other organisations involved in crime and fraud prevention.

Whenever fraud prevention agencies transfer your personal data outside of the European Economic Area, they impose contractual obligations on the recipients of that data to protect your personal data to the standard required in the European Economic Area. They may also require the recipient to subscribe to 'international frameworks' intended to enable secure data sharing.

### **Introducers and financial advisors**

We will keep your introducer (if applicable) informed of the progress of your application. We will also share information requests and documentation relating to the application with any financial advisor or mortgage broker that is acting on your behalf.

### **HOW LONG WILL WE KEEP YOUR INFORMATION FOR:**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, reporting requirements or complaint handling.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about you (including Contact, Identity, Financial and Transaction Data) for six (6) years after you cease being a customer for tax purposes.

In some circumstances you can ask us to delete your data: see Request erasure below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

### **YOUR DATA PROTECTION RIGHTS**

Your personal data is protected by legal rights, which include:

**The right to be informed** - You are entitled to know how we will use your personal data. This privacy notice is designed to meet your right to be informed.

**The right to access** - You are entitled to obtain a copy of your personal data and other supplementary information.

**The right to rectification** - You are entitled to have inaccurate personal data corrected or completed where it is incomplete.

**The right to erasure** – In some circumstances, you are entitled to have your personal data deleted. This is not an absolute right, please contact us for further information.

**The right to restriction** – In some circumstances, you are entitled to limit (suppress) the use of your personal data. This is not an absolute right, please contact our Data Protection Officer for further information.

**The right to portability** - You are entitled to obtain your personal data in a structured, commonly used, 'machine readable' format which allows you to transfer that data easily and securely electronically. This only applies to personal data collected from you using automated means (for example filling out our online enquiry form).

**The right to object** – In some circumstances, you are entitled to object to the processing of your personal data. This is not an absolute right, please contact our Data Protection Officer for further information. However, you do have the absolute right, at any time, to stop us processing your personal data for direct marketing purposes.

If you wish to exercise any of the above rights please contact us as set out in the Contact Us section below. You should expect to receive a response within a month (30 days).

We may require further information to enable us to handle your request, for instance to verify your identity or to evidence inaccuracy of data held. In these circumstances you should expect to receive a response within a month of us receiving the additional information.

You also have a right to complain to the Information Commissioner's Office (<https://ico.org.uk/>) which regulates the processing of personal data.

## HOW DO WE KEEP YOUR DATA SECURE?

We take the protection of personal information very seriously and we will maintain appropriate measures to maintain the confidentiality, integrity and availability of the information you have provided. Such measures include:

- Company security and Data protection policies and standards
- Staff training and awareness
- Role based access controls to prevent unauthorised access to the information
- Secure archiving and deletion
- Compliance with industry regulation and legislation

## CONTACTING US

- Telephone: 07814 385 852
- E-mail: [sam@transparentsf.co.uk](mailto:sam@transparentsf.co.uk)

For more information, or to exercise your data protection rights, please contact our data protection officer using the details above.