

ASCENTIAUK DATA PRIVACY NOTICE

1. HOW WE USE YOUR PERSONAL INFORMATION

AscentiaUK is a trading name of Ascentia Mortgage Solutions Limited. This privacy notice is to let you know how we promise to look after your personal information. This includes what you tell us about yourself, what we learn by having you as a customer, and the choices you give us about what marketing you want us to send you.

This notice explains how we do this and tells you about your privacy rights and how the law protects you.

We have also included some information about how the lenders we recommend are likely to use your information. Please refer to their specific Data Privacy Notice for more information relating to their obligations.

Data Protection law will change on 25th May 2018

2. OUR PRIVACY PROMISE

We promise:

- To keep your data safe and private.
- Not to sell your data.
- To give you ways to manage and review your marketing choices at any time.

This notice sets out most of your rights under the new laws. If applicable, we will update it again between now and **25th May 2018 when changes come into effect.**

3. WHO WE ARE

You can find out more about us at www.ascentiauk.co.uk. If you have any questions, or want more details about how we use your personal information, you can ask us using our online contact form: <http://ascentiauk.co.uk/contact-us/>

Or you can call us on **0800 612 3533**.

4. HOW THE LAW PROTECTS YOU

As well as our Privacy Promise, your privacy is protected by law. This section explains how that works. Data Protection law says that we are allowed to use personal information only if we have a proper reason to do so. This includes sharing it with required third parties. The law says we must have one or more of these reasons:

- To fulfil a contract we have with you, or
- When it is our legal duty, or
- When it is in our legitimate interest, or
- When you consent to it.

A legitimate interest is when we have a business or commercial reason to use your information. But even then, it must not unfairly go against what is right and best for you. If we rely on our legitimate interest, we will tell you what that is. Here is a list of all the ways that we may use your personal information, and which of the reasons we rely on to do so.

Here is a list of all the ways that we may use your personal information, and which of the reasons we rely on to do so. This is also where we tell you what our legitimate interests are.

What we use your personal information for:	Our reasons:	Our legitimate interests:
<ul style="list-style-type: none"> • To manage our relationship with you. • To develop new ways to meet our customers' needs and to grow our business. • To develop and carry out marketing activities. • To study how our clients use services from us and other organisations. • To provide advice or guidance about lender products and services. 	<ul style="list-style-type: none"> • Your consent. • Fulfilling contracts. • Our legitimate interests. • Our legal duty. 	<ul style="list-style-type: none"> • Keeping our records up to date, working out which products and services may interest you and telling you about them. • Developing our services, and what we charge for them. • Seeking your consent when we need it to contact you. • Being efficient about how we fulfil our legal duties.
<ul style="list-style-type: none"> • To develop and manage our brand and services. • To test new services • To manage how we work with other companies that provide services to us and our clients. 	<ul style="list-style-type: none"> • Fulfilling contracts. • Our legitimate interests. • Our legal duty. 	<ul style="list-style-type: none"> • Developing products and services, and what we charge for them. • Defining types of customers for new products or services. • Being efficient about how we fulfil our legal and contractual duties.
<ul style="list-style-type: none"> • To deliver our products and services. • To manage invoices • To collect and recover money that is owed to us. 	<ul style="list-style-type: none"> • Fulfilling contracts. • Our legitimate interests. • Our legal duty. 	<ul style="list-style-type: none"> • Being efficient about how we fulfil our legal and contractual duties. • Complying with regulations that apply to us.
<ul style="list-style-type: none"> • To detect, investigate, report, and seek to prevent financial crime. • To manage risk for us and our clients. • To obey laws and regulations that apply to us. • To respond to complaints and seek to resolve them. 	<ul style="list-style-type: none"> • Fulfilling contracts. • Our legitimate interests. • Our legal duty. 	<ul style="list-style-type: none"> • Developing and improving how we deal with financial crime, as well as doing our legal duties in this respect. • Complying with regulations that apply to us. • Being efficient about how we fulfil our legal and contractual duties.
<ul style="list-style-type: none"> • To run our business in an efficient and proper way. This includes managing our financial position, business capability, planning, communications, corporate governance, and audit. 	<ul style="list-style-type: none"> • Our legitimate interests. • Our legal duty. 	<ul style="list-style-type: none"> • Complying with regulations that apply to us. • Being efficient about how we fulfil our legal and contractual duties
<ul style="list-style-type: none"> • To exercise our rights set out in agreements or contracts. 	<ul style="list-style-type: none"> • Fulfilling contracts. 	

5. WHERE WE MIGHT OBTAIN PERSONAL INFORMATION FROM

We may use many different kinds of personal information from different sources in order to provide our advice. This may include:

- What we learn about you from letters, emails, and conversations between us.
- Open Data and Public Records Details about you that are in public records such as the Electoral Register, and information about you that is openly available on the internet.
- Documentary Data Details about you that are stored in documents in different formats, or copies of them. This could include things like your passport, drivers licence, or birth certificate.

6. SPECIAL TYPES OF DATA

The law and other regulations treat some types of personal information as special. We will only collect and use these types of data if required by the lender / insurer you are applying to requires this and if the law allows us to do so:

- Racial or ethnic origin
- Religious or philosophical beliefs
- Trade union membership
- Genetic and bio-metric data
- Health data including gender
- Criminal convictions and offences

7. CONSENTS

We may need to record and retain certain permissions, consents, or preferences that you give us. This includes things like how you want us to contact you going forward.

8. NATIONAL IDENTIFIER

We may need to record a number or code given to you by a government to identify who you are, such as a National Insurance number.

9. WHERE WE COLLECT PERSONAL INFORMATION FROM

We may collect personal information about you from these sources:

Data you give to us:

- When we advise you on products and services
- When you talk to us on the phone
- When you use our websites, mobile device apps, web chat
- In emails and letters
- In insurance claims or other documents
- In financial reviews and interviews
- In customer surveys
- If you take part in competitions or promotions we may run.

Data we collect when we provide advice and apply to third parties on your behalf. This includes the amount, frequency, type, location, origin and recipients:

- Payment and transaction data.
- Profile and usage data. This includes the profile you create to identify yourself when you connect to our internet, mobile and telephone services. It also includes other data about how you use those services. We gather this data

from devices you use to connect to those services, such as computers and mobile phones, using cookies and other internet tracking software.

Data from third parties we work with:

- Companies that introduce you to us
- Financial advisers
- Solicitors and Conveyancers
- Card associations
- Credit reference agencies
- Electronic Identity checking systems
- Insurers
- Social networks
- Fraud prevention agencies
- Estate agents
- Public information sources such as Companies House
- Market researchers
- Government and law enforcement agencies.

10. DIVULGING YOUR INFORMATION TO THIRD PARTIES

We may need to share your personal information with other organisations to provide you with the product or service you have chosen:

- If you apply for a mortgage through us, we will pass all relevant details on to the mortgage provider in order to successfully submit your application.
- If you apply for insurance through us, we will pass all relevant details on to the insurer in order to successfully submit your application.

11. CREDIT SCORING:

AscentiaUK will not run a lender's credit search on you unless you have specifically provided your consent. Any credit searches carried out will be performed by the lender whose mortgage you are applying for.

Lenders sometimes use systems to make automated decisions based on personal information we provide – or are allowed to provide from you – about you or your business. This helps the lender to make sure their decisions are quick, fair, efficient and correct, based on what they know. These automated decisions can affect the products, services or features the lenders may offer you now or in the future, or the price that they charge you for them.

12. HOW MORTGAGE LENDERS WILL USE THE INFORMATION YOU PROVIDE TO US

- Detecting fraud:

Lenders use your personal information to help decide if your application is fraudulent or if they suspect money-laundering. AscentiaUK will always act diligently and if we suspect an application is being made fraudulently we will inform the relevant authorities.

Lenders also check that you meet the conditions needed to apply for the mortgage. This may include checking age, residency, nationality or financial position.

- Approving credit:

Lenders use a system to decide whether to lend money to you when you apply for credit such as a mortgage. This is called credit scoring. It uses past data to assess how you're likely to act while paying back any money you borrow. This includes data about similar accounts you may have had before.

Credit scoring uses data from three sources:

- Your application form
- Credit reference agencies
- Data the lender may already hold.

It gives an overall assessment based on this. Banks and other lenders use this to help them make responsible lending decisions that are fair and informed. Credit scoring methods are tested regularly to make sure they are fair and unbiased.

13. CREDIT REFERENCE AGENCIES (CRAS)

Lenders carry out credit and identity checks when you apply for a product or services for you. Lenders may use Credit Reference Agencies to help them with this. Lenders will share your personal information with CRAs and they will give the lender information about you. The data they exchange can include:

- Name, address and date of birth
- Credit application
- Details of any shared credit
- Financial situation and history
- Public information, from sources such as the electoral register and Companies House.

They will use this data to:

- Assess whether you are able to afford to make repayments
- Make sure what you've told them is true and correct
- Help detect and prevent financial crime
- Manage accounts with them
- Trace and recover debts

Lenders may continue sharing your personal information with CRAs for as long as you are a customer. This will include details about your settled accounts and any debts not fully repaid on time. It will also include details of funds going into the account, and the account balance. If you borrow, it will also include details of your repayments and whether you repay in full and on time. The CRAs may give this information to other organisations that want to check credit status.

Lenders will also tell the CRAs when you settle your accounts with them. When the lenders ask CRAs about you, they will note it on your credit file. This is called a credit search. Other lenders may see this and they may see credit searches from other lenders. If you apply for a product with someone else (spouse, partner or civil partner etc.) the CRAs will link your records with theirs. Lenders may do the same. You should tell them about this before you apply for a product or service. It is important that they know your records will be linked together, and that credit searches may be made on them. These links will stay on your files unless one of you asks the CRAs to break the link. You will normally need to give proof that you no longer have a financial link with each other. You can find out more about the CRAs on their websites, in the Credit Reference Agency Information Notice. This includes details about:

- Who they are
- Their role as fraud prevention agencies
- The data they hold and how they use it
- How they share personal information
- How long they can keep data
- Your data protection rights.

Here are links to the information notice for each of the three main Credit Reference Agencies:

Callcredit: www.callcredit.co.uk/crain
Equifax: www.equifax.co.uk/crain
Experian: www.experian.co.uk/crain

14. FRAUD PREVENTION AGENCIES (FPAS)

In addition, lenders may need to confirm your identity before they provide products or services to you. Once you have become a customer of theirs, they may also share your personal information as needed to help detect fraud and money-laundering risks. Lenders use Fraud Prevention Agencies to help them with this.

Both lenders and fraud prevention agencies can only use your personal information if they have a proper reason to do so. It must be needed either for them to obey the law, or for a 'legitimate interest'. A legitimate interest is when they have a business or commercial reason to use your information. This must not unfairly go against what is right and best for you. The lender will use the information to:

- Confirm identities
- Help prevent fraud and money-laundering
- Fulfil any contracts you or your business has with us.

Lenders or an FPA may allow law enforcement agencies to access your personal information. This is to support their duty to detect, investigate, prevent and prosecute crime. FPAs can keep personal information for different lengths of time. They can keep your data for up to six years if they find a risk of fraud or money-laundering.

15. THE INFORMATION LENDERS USE

These are some of the kinds of personal information that lenders use:

- Name
- Date of birth
- Residential address
- History of where you have lived
- Contact details, such as email addresses and phone numbers
- Financial data
- Data relating to your or your businesses products or services
- Employment details
- Vehicle details
- Data that identifies computers or other devices you use to connect to the internet. This includes your Internet Protocol (IP) address.

16. AUTOMATED DECISIONS FOR FRAUD PREVENTION

The information the lenders have for you is made up of what you tell them, and data they collect when you use their services, or from third parties they work with, such as AscentiaUK. Lenders and FPAs may process your personal information in systems that look for fraud by studying patterns in the data. Lenders may find that an account is being used in ways that fraudsters work. Or they may notice that an account is being used in a way that is unusual for you or a typical customer. Either of these could indicate a possible risk of fraud or money-laundering.

16a. How this can affect you

If the lender or an FPA decide there is a risk of fraud, they may decline your application. FPAs will also keep a record of the risk that you or your business may pose. This may result in other organisations refusing to provide you with products or services, or to employ you.

16b. Data transfers out of the EEA

FPAs may send personal information to countries outside the European Economic Area ('EEA'). When they do, there will be a contract in place to make sure the recipient protects the data to the same standard as the EEA. This may include following international frameworks for making data sharing secure.

AscentiaUK will only send your data outside of the European Economic Area ('EEA') to:

- Follow your instructions.
- Comply with a legal duty.

We'll use one of these safeguards:

- Transfer it to a non-EEA country with privacy laws that give the same protection as the EEA. Learn more on the European Commission Justice website http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm
- Put in place a contract with the recipient that means they must protect it to the same standards as the EEA. Read more about this here on the European Commission Justice website http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm
- For data sent to the USA, transfer it only to organisations that are part of Privacy Shield. This is a framework that sets privacy standards for data sent between the US and EU countries. It makes sure those standards are similar to what is used within the EEA. You can find out more about data protection on the European Commission Justice website http://ec.europa.eu/justice/data-protection/data-collection/data-transfer/index_en.htm

17. IF YOU CHOOSE NOT TO GIVE PERSONAL INFORMATION

We may need to collect personal information by law, or under the terms of a contract we have with you. If you choose not to give us this personal information, it may delay or prevent us from meeting our obligations. It may also mean that we cannot provide you with the mortgage and protection advice you have contacted us for in the first place.

It could mean that we cease providing advice to you.

18. MARKETING

We may use your personal information to tell you about relevant products and offers. This is what we mean when we talk about 'marketing'. The personal information we have for you is made up of what you tell us, and data we collect when you use our services, or from third parties we work with. We study this to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you. We can only use your personal information to send you marketing messages if we have either your consent or a 'legitimate interest'. That is when we have a business or commercial reason to use your information. It must not unfairly go against what is right and best for you. You can ask us to stop sending you marketing messages by contacting us at any time. Whatever you choose, you'll still receive important information such as mortgage application updates. We may ask you to confirm or update your choices, if you apply for any new products or services with us in future. We will also ask you to do this if there are changes in the law, regulation, or the structure of our business. If you change your mind you can update your choices at any time by contacting us.

19. HOW LONG WE KEEP YOUR PERSONAL INFORMATION

We will keep your personal information for as long as you are a customer of AscentiaUK. After you stop being a customer, we may keep your data for up to 10 years for one of these reasons:

- To respond to any questions or complaints.
- To show that we treated you fairly.
- To maintain records according to rules that apply to us.

We may keep your data for longer than 10 years if we cannot delete it for legal, regulatory or technical reasons. We may also keep it for research or statistical purposes. If we do, we will make sure that your privacy is protected and only use it for those purposes.

20. HOW TO GET A COPY OF YOUR PERSONAL INFORMATION

Under the current Data Protection Act you have the right of access to your personal data. The Act allows us to charge a fee of £10 for this service and we will apply this charge until 25th May 2018.

There will be no charge after this date. For further details on how to request a copy of your information, please call us on **0800 6123533**, or write to us at this address:

AscentiaUK
3 Home Farm Close
Bath
BA2 8SE

21. LETTING US KNOW IF YOUR PERSONAL INFORMATION IS INCORRECT

You have the right to question any information we have about you that you think is wrong or incomplete. Please contact us if you want to do this. If you do, we will take reasonable steps to check its accuracy and correct it.

If you have any special requirements please call us on **0800 6123533**, or write to us at this address:

AscentiaUK
3 Home Farm Close
Bath
BA2 8SE

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Registered in England and Wales. Registered Number 10115845

22. FURTHER INFORMATION

For further information please contact us on **0800 6123533**, or write to us at this address:

AscentiaUK
3 Home Farm Close
Bath
BA2 8SE

23. WHAT IF YOU WANT US TO STOP USING YOUR PERSONAL INFORMATION?

You have the right to object to our use of your personal information, or to ask us to delete, remove, or stop using your personal information if there is no need for us to keep it. This is known as the 'right to object' and 'right to erasure', or the 'right to be forgotten'. There may be legal or other official reasons why we need to keep or use your data. But please tell us if you think that we should not be using it. We may sometimes be able to restrict the use of your data. This means that it can only be used for certain things, such as legal claims or to exercise legal rights. In this situation, we would not use or share your information in other ways while it is restricted. You can ask us to restrict the use of your personal information if:

- It is not accurate.
- It has been used unlawfully but you don't want us to delete it.
- It not relevant any more, but you want us to keep it for use in legal claims.
- You have already asked us to stop using your data but you are waiting for us to tell you if we are allowed to keep on using it.

If you want to object to how we use your data, or ask us to delete it or restrict how we use it or, please contact us.

24. HOW TO WITHDRAW YOUR CONSENT

You can withdraw your consent at any time. Please contact us if you want to do so. If you withdraw your consent, we may not be able to provide you with advice . If this is so, we will tell you.

25. HOW TO COMPLAIN

Please let us know if you are unhappy with how we have used your personal information. You can contact us on **0800 6123533**, or write to us at this address:

**AscentiaUK
3 Home Farm Close
Bath
BA2 8SE**

You also have the right to complain to the Information Commissioner's Office. Find out on their website how to report a concern <https://ico.org.uk/concerns/>