The Mortgage Point customer privacy notice

Registered name: TMPUK Ltd

We are the controller of your personal data. For more information on controllers and their responsibilities please see our guidance on data protection principles, definitions, and key terms. This privacy notice tells you what to expect us to do with your personal information.

- Contact details
- What information we collect, use, and why
- Lawful bases and data protection rights
- Where we get personal information from
- How long we keep information
- Who we share information with
- How to complain

Contact details

Post
TMPUK Ltd, Oak House, Samuel Brunts Way, MANSFIELD, Nottinghamshire, NG18 2AH, GB

Telephone
01156978086

Email

info@themortgagepoint.co.uk

What information we collect, use, and why

We collect or use the following information to **provide and improve products and services for clients**:

- Names and contact details
- Addresses
- Gender
- Occupation
- Date of birth
- Marital status
- Third party information (such as family members or other relevant parties)
- Payment details (including card or bank information for transfers and direct debits)
- Financial data (including income and expenditure)
- Transaction data (including details about payments to and from you and details of products and services you have purchased)
- Usage data (including information about how you interact with and use our website, products and services)

- Employment details (including salary, sick pay and length of service)
- Credit history and credit reference information
- Health information (such as medical records or health conditions)
- Criminal records data (including driving or other convictions)
- Information relating to compliments or complaints
- Video recordings
- Audio recordings (eg calls)
- Records of meetings and decisions
- Account access information
- Website user information

We also collect or use the following special category information to **provide and improve products and services for clients.** This information is subject to additional protection due to its sensitive nature:

- Health information
- Genetic information

We collect or use the following personal information for **information updates or marketing purposes**:

- Names and contact details
- Addresses
- Marketing preferences

We also collect or use the following special category information for **information updates or marketing purposes.** This information is subject to additional protection due to its sensitive nature:

We collect or use the following personal information to **comply with legal requirements**:

- Name
- Contact information
- Identification documents
- Client account information
- Any other personal information required to comply with legal obligations
- Criminal offence data

We also collect or use the following special category information to **comply with legal requirements.** This information is subject to additional protection due to its sensitive nature:

- Health information

We collect or use the following personal information for **dealing with queries, complaints or claims**:

- Names and contact details
- Addresses
- Payment details
- Account information
- Call recordings
- Customer or client accounts and records
- Financial transaction information
- Correspondence

We also collect or use the following special category information for **dealing with queries, complaints or claims.** This information is subject to additional protection due to its sensitive nature:

- Health information

Lawful bases and data protection rights

Under UK data protection law, we must have a "lawful basis" for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO's website.

Which lawful basis we rely on may affect your data protection rights which are set out in brief below. You can find out more about your data protection rights and the exemptions which may apply on the ICO's website:

- **Your right of access** - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. Read more about the right of access.
- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. Read more about the right to rectification.
- **Your right to erasure** - You have the right to ask us to delete your personal information. Read more about the right to erasure.
- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information. Read more about the right to restriction of processing.

- **Your right to object to processing** - You have the right to object to the processing of your personal data. Read more about the right to object to processing.
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. Read more about the right to data portability.
- **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time. Read more about the right to withdraw consent.

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information to **provide and improve products and services for clients** are:

- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
    - We have a legitimate interest in using personal data to provide mortgage, protection and related services. This helps us answer enquiries, understand customer needs, progress applications, speak to lenders and insurers, keep records, check advice quality, and support good client outcomes. We only use the data we need. We keep it safe. We limit access to people who need it for their role. We have balanced our needs against the rights of clients and do not use data in a way that is unfair or unexpected.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Our lawful bases for collecting or using personal information for **information updates or marketing purposes** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
    - We rely on legitimate interests and consent. We use legitimate interests to send service updates and useful information about mortgage, protection and related services where people would expect this. We use consent where people choose to opt in to marketing. People can object to marketing or withdraw consent at any time.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Our lawful bases for collecting or using personal information to **comply with legal requirements**:

- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
    - We rely on legal obligation where we need to use personal data to follow laws and rules. This includes identity checks, fraud checks, anti-money laundering checks, complaint records, FCA rules, HMRC, ICO, regulator requests and other legal duties.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Our lawful bases for collecting or using personal information for **dealing with queries, complaints or claims** are:

- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
    - We rely on legal obligation and legitimate interests. We use data to answer queries, look into complaints, keep complaint records, deal with the Financial Ombudsman

Service, manage claims, fix issues, and improve our service. We only use data that is needed for this.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Where we get personal information from

- Directly from you
- Publicly available sources
- Credit reference agencies

How long we keep information

If you become a client of a lender/insurer as a result of the advice we provide to you, we will retain a full record of your interactions with us to enable us to meet our regulatory obligations to evidence we gave suitable advice and to enable us to answer any complaints that may arise as a result of our advice. In practice this means that we will keep your records for the term of the product applied for plus an extra 6 years.

If, as a result of our advice, you make an application to a lender/insurer but do not ultimately become a client of that institution, we will keep a full record of your interactions with us for 6-years to meet our obligations under UK Money Laundering regulations.

If we provide you with advice on a financial product, but you do not engage our services to make an application to a lender/insurer, we will keep a full record of your interactions with us for 3-years, to enable us to meet our regulatory record keeping obligations regarding evidencing the suitability of our advice.

If we collect personal information from you, but are unable to provide you with suitable advice, then we will keep a full record of your interactions with us for 1-year to facilitate an easier interaction between us if you re-engage our services within this period.

If you request we contact you in relation to our service by providing us with your name and a contact method (e.g. phone, email) through an enquiry form (either on our own, or through a 3rd party website) we will use our best endeavours to contact you as soon as possible. If we are unable to make contact with you, we will retain this information for a period of 180-days from the time we de-activate your lead in our database, to ensure we can fulfil our contractual obligations to our lead partners.

For more information on how long we store your personal information or the criteria we use to determine this please contact us using the details provided above.

Others we share personal information with

- Other financial or fraud investigation authorities
- Insurance companies, brokers or other intermediaries
- Professional or legal advisors
- Regulatory authorities
- External auditors
- Organisations we're legally obliged to share personal information with
- Professional consultants
- Third parties:
    - Other relevant third parties, such as lenders, mortgage clubs, packagers, conveyancers and surveyors

How to complain

If you have any concerns about our use of your personal information, you can make a data protection complaint to us:
Email: info@themortgagepoint.co.uk
Telephone: 01156978086
Post: TMPUK Oak House Samuel Brunts Way Mansfield NG18 2AH

How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

Website: https://www.ico.org.uk/make-a-complaint