

Privacy Notice

During the course of dealing with us, we will ask you to provide us with detailed personal information relating to your existing circumstances and your financial situation (**"Your Personal Data"**). This document is important as it allows us to explain to you what we need to do with Your Personal Data, and the various rights you have in relation to Your Personal Data.

What do we mean by "Your Personal Data"?

Your Personal Data means any information that describes or relates to your personal circumstances. Your Personal Data may identify you directly, for example your name, address, date of birth, National Insurance number. Your Personal Data may also identify you indirectly, for example, your employment situation or any other information that could be associated with your cultural or social identity.

In the context of providing you with assistance in relation to your requirements Your Personal Data 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 employment history, salary/bonus schemes/overtime/sick pay/other benefits);
- Bank account details, sources of income and expenditure, family circumstances and details of dependents;
- For insurance products, your health status/ history, medical conditions, diagnosis, prognosis, treatments and reports;
- Any existing mortgage/finance and/or insurance products and the terms and conditions relating to these.

The basis upon which our Firm will deal with Your Personal Data

When we speak with you about your requirements we do so on the basis that both parties are entering a contract for the supply of services. In order to perform that contract and to arrange the products you require, we have the right to use Your Personal Data for the purposes detailed below.

Alternatively, either during initial discussions with you or when the contract between us has come to an end for whatever reason, we have the right to use Your Personal Data provided it is in our legitimate business interest to do so and your rights are not affected. For example, we may need to respond to requests from mortgage lenders, insurer's and our Compliance Service Provider relating to the advice we have given to you, or to make contact with you to seek feedback on the service you received.

On occasion, we will use Your Personal Data for contractual responsibilities we may owe our regulator, The Financial Conduct Authority, or for wider compliance with any legal or regulatory obligation to which we might be subject. In such circumstances, we would be processing Your Personal Data in order to meet a legal, compliance or other regulatory obligation to which we are subject.

The basis upon which we will process certain parts of Your Personal Data

Where you ask us to assist you with your needs, we may ask you information about your ethnic origin and your health (**"Your Special Data"**). We will record and use Your Special Data to make enquiries that may meet your needs and to provide you with advice regarding the suitability of any product that may be available to you.

If you have parental responsibility for children under the age of 13, it is also very likely that we will record information on our systems that relates to those children and potentially, to their Special Data.

The arrangement of certain types of finance and/or 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 related activities such as underwriting and fraud management.

We will use Your Special Data and any Criminal Disclosures in the same way as we use Your Personal Data generally, as set out in this Privacy Notice. Information on Special Category Data and Criminal Disclosures must be capable of being exchanged freely between intermediaries such as our firm and providers.

How do we collect Your Personal Data?

We will collect and record Your Personal Data from a variety of sources, but mainly directly from you. You will usually provide us with information during the course of our initial meetings or conversations to establish your circumstances, needs and preferences in relation to mortgages and/or insurance.

You will provide information to us verbally and in writing, including email.

We may also obtain some information from third parties, for example, information from your employer, and searches of information in the public domain such as the voters roll. Where we use technology solutions to assist in the collection of Your Personal Data, such as software to verify your credit status, we will only do this if we have your consent to access your information in this manner. With regards to electronic ID checks, we do not require your consent but will inform you of how such software operates and the purpose for which it is used.

What happens to Your Personal Data when it is disclosed to us?

While handling Your Personal Data, we will:

- Record and store Your Personal Data in our paper files, mobile devices and on our computer systems (websites, email, hard drives and cloud facilities). This information can only be accessed by authorised employees and consultants within our Firm and only when it is necessary to provide our service to you and to perform any administration tasks associated with or incidental to that service
- Submit Your Personal Data to relevant third parties, such as mortgage lenders, finance providers or insurers, both in paper form and on-line via a secure portal. The provision of this information to a third party is essential in allowing us to progress any enquiry or application made on your behalf and to deal with any additional questions or administrative issues that providers may raise.
- Use Your Personal Data for the purposes of responding to any queries you may have in relation to any product you may effect, or to inform you of any developments in relation to those products of which we might become aware.

Artificial Intelligence (AI)

AI is the development of computer systems that can perform tasks, typically requiring human intelligence, often by processing large amounts of data to achieve goals. To enhance the quality, efficiency, and accuracy of our services, we may on occasion use AI to assist with:

- Recording and transcribing meetings, although you can opt out of being recorded;
- Generating meeting notes and summaries;
- Drafting correspondence and documentation;
- Conducting checks for compliance with internal procedures.

We are committed to protecting your privacy and ensuring that any information processed is handled securely. If you have any questions or concerns about the AI we use in relation to your personal information, please contact us directly.

Sharing Your Personal Data

From time to time Your Personal Data may be shared with third parties who we believe may be able to assist us with your enquiry or application, and/or support your needs, circumstances and objectives. These third parties may include, but not be limited to, our compliance advisers, product specialists and other professional service providers.

In each case, your Personal Data will only be shared for the purposes set out in this privacy notice, i.e. to progress with your enquiry and/or to provide you with our or other professional services.

Please note that this sharing of Your Personal Data does not entitle such third parties to send you marketing or promotional messages: it is shared to ensure we can adequately fulfil our responsibilities to you and as otherwise set out in this Privacy Notice.

We do not envisage that the performance of our service will involve Your Personal Data being transferred outside of the European Economic Area.

Security and retention of Your Personal Data

Your privacy is important to us and we will keep Your Personal Data secure and in accordance with our legal responsibilities. We will take reasonable steps to safeguard Your Personal Data against it being accessed unlawfully or maliciously by a third party. 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 sending original documentation to us.

Your Personal Data will be retained by us either electronically or in paper format for a minimum of six years, or in instances whereby we have legal right to retain such information and records indefinitely.

Your rights and choices in relation to Your Personal Data

Your personal data is protected by legal rights, which include the individual's following rights to be:

- Informed – about the collection and use of your personal data;
- Access – to access and receive a copy of your personal data and other supplementary information;
- Rectification - to have inaccurate personal data rectified or completed if incomplete;
- Erasure – to have your personal data erased;
- Restrict Processing – to request the restriction or suppression of your personal data;
- Portability – to obtain and reuse your personal data for your own purposes across different services;
- Object – to the processing of your personal data and/or absolute right to stop your data being used for direct marketing;
- Automated Decision-Making and Profiling – object to your data being used for automated decision-making (without human involvement) or profiling (automated analysis of your personal data).

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

If you have any questions or comments about this document, or wish to make contact to exercise any of your rights set out within, please contact: The Compliance Director on 020 3950 2985 or info@cfbrokers.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 Personal Data, 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 Personal Data 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.

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