

## **Landlord Mortgages Limited Privacy Statement**

Landlord Mortgages Limited respects your privacy and in accordance with the General Data Protection and related UK data protection legislation, we are committed to protecting the confidentiality and security of the information that you provide to us.

This Privacy Notice explains how we use any personal information that we collect about you. The information we collect from you is essential for us to be able to carry out the insurance or mortgage services you require from us. Without collecting your personal data we would also be unable to fulfil our legal and regulatory obligations.

### **What Information do we collect from you**

We only collect, use and store your information where we have lawful grounds and legitimate business reasons to do so. To be able to provide you with the best personal service possible, we will need to gather certain personal information from you when you contact or interact with us. We collect personal information such as name, contact details, date of birth, gender, marital status., financial details, employment details and other personal details depending on the nature of your enquiry with regards to an insurance or mortgage service we offer. We will also use this information for security, identification and verification purposes, to administer payments and to enable us to carry out anti-money laundering and other financial crime checks where required. When arranging a mortgage or insurance, we will need to ask for your direct debit details to pass onto the lender or insurance providers so it can collect payments. Where we are charging a fee for arranging a mortgage, or the mortgage we are arranging carries a cost e.g a valuation fee, or collecting an insurance premium, we will need to ask you for payment information such as your debit or credit card details. Before submitting any transaction to a lender or product provider, the law requires us to have verified your identity. We will therefore ask you to provide us with documents that confirm your identity. We will only use your information to fulfil requests for quotes, renewals, & products & services that we offer as part of our insurance & mortgage broking.

In certain cases we may need to collect, use and store sensitive personal/special category data such as criminal convictions as necessary in relation to insurances or mortgage applications. This information may be shared with insurers, mortgage & insurance product providers and our third party service providers.

We might collect your personal data from various sources (depending on your personal circumstances), including:

- You, your family members or representative
- Other insurance market participants
- Credit reference agencies
- Anti fraud databases, sanction lists, court judgements and other databases
- Government agencies such as HRMC
- In the event of a claim, third parties such as loss adjusters, solicitors and claim handlers

If you give personal information about someone else (such as a joint applicant for insurance or mortgage), you must have permission from the individual to provide that personal information to us and for us to use it, as set out in this Privacy Policy. It is your responsibility to ensure and confirm that you have told the individual who we are and how we use personal information, as set out in the Privacy Policy.

Throughout your relationship with us, we will hold your personal information securely in our systems. Subsequently, when you contact with us, we will use specific pieces of your information to help us identify you and verify that we are dealing with the right person. If there is any change to any of your personal information and you notify us, we will update your records in our systems.

### **Use of Data**

The Law requires us to comply with a number of regulations. Most commonly we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

In respect of your insurance & mortgage processing, the legal basis for processing data is to ensure the proper performance on your insurance contract & processing of your mortgage application. Where data processing passes the necessity and balancing tests, the legal basis on which we will process your personal data for marketing purposes is because there is a legitimate interest. You can stop all marketing at any point by calling, writing, or emailing us at [lml.co.uk](mailto:lml.co.uk).

### **How do we use Your Personal Data:**

We use your personal information in various ways:

- To confirm that you are who you say you are when you contact us.
- To formulate our advice and recommendation for the services we offer and to submit applications to lenders and insurance and mortgage product providers
- We only share personal information with others when we are legally permitted to do so. When we share data with others we put contractual arrangements and security mechanisms in place to protect the data and to comply with our data protection, confidentiality and security standards, we use third parties to help run our business. To fulfil our contractual obligations, we may share your personal data with third parties

\*Mortgage Lenders

\*Insurance Providers

\*Conveyancers

\*Loss Adjusters

\*Law enforcement or other government and regulatory agencies or to other third parties as required by and in accordance with, applicable law or regulation.

We perform anti fraud, credit and security checks using your details and receive information about you from other sources (such as credit reference agencies and similar third parties), which will be added to the personal information which we already hold about you. Some personal information may be provided to us by third parties such as insurance companies and other insurance intermediaries. In some cases you will have previously submitted your personal information to them and given them approval to pass this information on for certain purposes.

Such information will only be obtained from reputable sources which operate in accordance with the General Data Protection Regulation.

Data Protection Laws require that Landlord Mortgages Limited as a Data Controller to process your personal data, we must meet at least one prescribed basis for it. We rely on the following basis for the activities we carry out.

### **Contract:**

We rely upon this basis because you will provide us with your personal data as you want to use our services. This means that our use of your information is governed by contract terms. It is your choice to give us this information, however if you choose not to provide it, we may not be able to offer some or all of the services you require. Under this basis we process your data in the following scenarios:

- Understanding your circumstances and requirements
- Assessing risks
- Formulating our advice and recommendations to you
- Updating, consolidating and improving the accuracy of our records
- Enabling you to access our website and use our services
- Letting you know about significant changes to our products, terms or privacy policy
- Confirming your identity and verifying the information you provide
- Providing and improving customer support
- Sending you servicing communications
- Responding to your enquiries and complaints
- Providing you with products and services and keeping you up to date with important changes and developments to their features and how they work

### **Consent:**

Where we collect other information from you -or when third parties do so for us-we always ask for your consent first. E.g. before you use our website you'll be asked to consent to us using cookies to collect data about the device you are using. If you don't want to give consent , or you remove your consent at a later point, we may not be able to provide some or all of the services you require.

We may also see your consent in the following scenarios: Marketing:-to help you explore all your options from time to time we would like to let you know of the products , services and offers that may be of interest to you.

### **Legitimate Interests:**

In the United Kingdom , organisations can use personal information where the benefits of doing so are not outweighed by the interests or fundamental rights or freedoms of individuals. The law calls this the "Legitimate Interests" basis for processing.

We rely on this basis for process personal data for the following benefits:

- Helping to Prevent and detect crime such as fraud and Money Laundering
- Complying with legal and regulatory requirements- We must comply with various legal and regulatory requirements. We are regulated by the Financial Conduct Authority and sometimes we may have to provide information to it as part of our regulatory responsibilities
- Ongoing Service: when the product or service that we have recommended to you expires or is due for renewal , we will contact you beforehand to notify you of this so that we can explore the current options available to you, evaluating the risks to be covered and matching appropriate policy/premium. Payment of premium where the insured /policyholder is an individual Contacting the insured/policyholder to renew the insurance policy. Policy Administration :client care, including communicating with you and sending you updates. Claims processing: Managing Insurance and reinsurance claims
- Marketing services: Like any commercial organisation, we run a business and where necessary process information that helps us to do this. We have various safeguards in place to make sure the individuals whose personal information we handle are not disadvantaged by the way we use their personal data. You will receive marketing communications from us if you have requested information from us or purchased services from us and in each case you have not opted out of receiving that marketing.
- Reporting and analytical purposes- we process this personal information to help us analyse the service we are providing and identify ways to improve
- Tracking activity- we like to know how people use our website or get in touch with us so we can identify ways to improve our services.
- Maintaining our records and other administrative purposes- We always strive to provide the most accurate information to our customers and clients.
- Resolving complaints and disputes- if you have a reason to make a complaint, we will use your information to look into this.
- Improving data accuracy and completeness-When you register to use our services you may give us additional information about yourself. We will use this to improve the accuracy and completeness of our data.
- Email tracking- this helps us to improve our communications to our customers.

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that the reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### **Sharing Information:**

Because of the nature of our role as a mortgage broker, we share the personal information you give us with people who need to handle it so that we can provide our services to you.

- **Suppliers:** we use a number of service providers to support our business. They may have access to our systems and data so that they can provide the services to us/and or to you on our behalf.

- **Agents:** We sometimes use organisations to help provide our products and services to you. They will have access to your data so that they can do this.
- **Public bodies, law enforcement and regulators**-the police, other law enforcement agencies , regulators, as well as public bodies such a local and central authorities can sometimes request personal information. This may be for reasons including: detecting crime, apprehending or prosecuting offenders, assessing or collecting tax & investigating complaints .
- **Lenders and Insurers:** In some circumstances, we share credit report information and personal information (such as your name and address) with lenders and insurers and this may include to enable to verify that you are eligible for the product you're applying for, supporting you to complete your application to the lender, contacting you about credit and financial products and complying with any contractual, legal and /or regulatory obligations.
- **Potential Recipients:** Mortgage lenders, insurance providers, estate agents, conveyancers, loss adjusters, surveyors .We may all also share your personal data with the following data processors where necessary to fulfil our services and regulatory obligations- Covea, Alan Boswell Group, RGA Underwriting, Legal & General Mortgage Club, TMA Mortgage Club, Mortgage Intelligence Club. They are contractually restricted from using or disclosing the information we give them , except as necessary to perform services on our behalf or to comply with legal requirements

We only share your information if we are satisfied that our partners or suppliers have sufficient measures in place to protect your information in the same way that we do.

You understand that we may disclose the information you provide to relevant other parties for the purpose described in this notice.

#### **Opting Out:**

You can ask us to stop sending you marketing messages at any time by logging onto our website and updating your preferences. Or you can write to us at Landlord Mortgages, Oaklands Farm , Forges lane. Eversley. RG27 0RB, or by emailing us at [landlordmortgages@btinternet.com](mailto:landlordmortgages@btinternet.com). Where you opt out of receiving these marketing messages, this will not apply to the personal data provided to us as a result of product/service purchased through us.

#### **Marketing:**

We would like to keep you updated about our relevant products and services by email. If we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes we will only do so with your consent. Your consent will be obtained specifically at the appropriate time.

If you have consented and wish to stop using your information for this purpose or any other purpose then please contact us.

#### **Third Party-Marketing:**

We will get your express opt in consent before we share your personal data with any company outside Landlord Mortgages for marketing purposes.

#### **Transfer of personal data outside the UK:**

Certain personal information held on our Information Technology systems may be transferred across geographical borders in accordance with the applicable law. By providing us with your information, you consent to the collection , international transfer, storage, and processing of your information. These transfers are governed by European Union(EU) standard contractual clauses or equivalent data transfer agreements to protect the security and confidentiality of personal information.

#### **Data Security:**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or assessed in an unauthorised way, altered or disclosed. In addition, we will limit access to your personal data to those agents and other parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

#### **Email and Security:**

E-mails and any attachments are confidential and may contain legally privileged information. If you are not the intended recipient of an e mail message from us, please telephone or email us immediately, delete the message from your system and do not read, copy, distribute or otherwise use the email message and any attachments.

Communication by email is not secure as messages can be intercepted and read by someone else. Therefore, we strongly advise you not to e mail any information to us which if disclosed to unrelated third parties would be likely to cause you distress.

We will normally respond by email to requests that reach us via email in the first place, however you must realise that there can be no guarantee of privacy. If you have any concern, then please make it clear that you wish us to respond in a more secure way and provide your postal address or telephone number for the purpose.

Any email including its content may be monitored and used by the firm for the reasons of security and for monitoring internal compliance. Email monitoring/blocking software may be used. Please be aware that you have a responsibility to ensure that any email you write to forward is within the bounds of the law.

Landlord Mortgages Limited cannot guarantee that any email or any attachment is virus free or has not been intercepted and amended and you should perform your own virus checks.

### **Third Parties:**

Sometimes we may pass your information onto third parties who provide services to us. When we do this it is on the understanding that they care for your information as carefully as we do, keep it confidential and use it only for the agreed purposes. Your personal data may be transferred to these authorised parties:

#### **Third party organisations that provide IT services and applications, administrative functions and support:**

We use third parties to support us in providing our services and to help provide, run and manage our internal IT systems. e.g. providers of information technology, cloud based software as a service providers, identity management, website hosting and management, data analysis, data back-up, security and storage services. The servers powering and facilitating that cloud infrastructure are located in secure data centres around the world, and personal data may be stored in any one of them.

#### **Third party organisations that otherwise assist us in providing goods, services or information:**

We use third parties acting on our behalf such as suppliers and /or agents (including without limitation, customer care teams and processing centres) for the purpose of administration, income, credit and risk assessment, product suitability and product sourcing in respect of products or services you have requested.

#### **Professional advisers:**

We may engage other professional advisers to perform specific work that helps us meet our legal, regulatory and statutory responsibilities. We will have contractual arrangements and security mechanisms in place to protect data and to comply with our data protection, confidentiality and security standards.

#### **Law enforcement or other government and regulatory agencies or to other third parties as required by, and in accordance with, applicable law or regulation:**

Occasionally we may receive requests from third parties with authority to obtain disclosure of personal data such as the police, regulatory bodies or legal advisers in connection with any alleged criminal offence, unlawful activity or suspected breach of the Terms of Use and or breach of other terms and conditions or otherwise where required by law or where we suspect harm or potential harm to others. We shall not be obliged to give you any further notice of this.

#### **Third Party Website:**

When you are introduced to us by a third party website, we may share information you give to us with this third party website. You are advised to note that our Privacy Policy does not extend to any third party website you may come from or are subsequently directed to from our website. You should exercise caution and look at the privacy statement applicable to the website in question before transacting any business through them.

## **Data Retention:**

We will only keep your personal information securely stored for as long as we need it to provide you with the services you want from us. This will usually be for a minimum period of seven years or otherwise as determined by law or regulation. We also keep it to comply with our legal and regulatory obligations, to resolve any issues or disputes that may arise. Once we decide that we no longer need your information, it will be securely and confidentially destroyed.

## **Your Legal Rights:**

Under the Data Protection regulations, individuals have a number of rights. These are as follows

- **Right to be informed:** Individuals have the right to be informed about the collection and use of their personal data. We do this in our Privacy Policy.
- **The Right of Access:** Individuals have the right to access their personal data and supplementary information. Individuals have the right to obtain:
  - \*confirmation that their data is being processed
  - \*access to their personal data
  - \*other supplementary information

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee, if your request is clearly unfounded, repetitive or excessive. We will provide the requested information to you within a month of receiving your request, unless the request is complex or numerous, in which case we may extend this period by up to a further two months. Before we proceed with any request, we will take steps to verify the identity of the person making the request. This is a security measure to ensure that the personal data is not disclosed to any person who has no right to receive it.

- **Right to Rectification:** Individuals have the right to request that that inaccurate data is rectified, or completed if it is incomplete. If you make such a request, we may need to verify the accuracy of the new data you provide to us.
- **Right to erasure (known as the “Right to be forgotten”):** Individuals have the right to have their personal data erased if:
  - \*the personal data is no longer necessary for the purpose which it was originally collected
  - \*we rely upon consent as our lawful basis for holding the data and you withdraw that consent
  - \*We rely upon legitimate interests as our basis for processing and you object to the processing of your data and there is no overriding legitimate interest to continue this processing
  - \*we are processing your personal data for direct marketing purposes and you object to that processing
  - \*we have processed your data unlawfully
  - \*we have to do it to comply with a legal obligation

Note: We may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable at the time of your request. e.g to comply with a legal obligation, for the establishment, exercise or defence of legal claims. We are regulated by the FCA and are required to retain records that demonstrate the advice / recommendation we provide customers. These records contain personal information and data that enables us to formulate our advice or recommendation. We will not remove or delete any personal information or data until such time our regulatory obligation has been fulfilled in respect of each transaction or piece of advice or recommendation.

- **Right to restrict processing:** Individuals have the right to restrict the processing of their personal data in certain circumstances. This means that an individual can limit the way the organisation uses their data in the following circumstances:
  - \*you contest the accuracy of your personal data and we are verifying its accuracy
  - \*the data has unlawfully processed and you oppose to erasure, requesting restrictions instead
  - \*we no longer need the personal data but you need us to keep it in order to establish, exercise or defend a claim
  - \*you have objected to us processing your data and we are considering whether our legitimate grounds override your request.

If you choose to exercise this right, we may not be able to proceed with a transaction or provide you with our recommendation. This may mean that we are unable to submit or progress an application with a lender or insurance provider. In these circumstances, we will notify you of the impact of your request.

- **Right to data portability:** The right to data portability allows individuals to obtain and reuse their personal data for their own purposes across different services. The right to data portability only applies:
  - \*to personal data you have provided to us
  - \*where the processing is based on your consent or for the performance of a contract
  - \*where processing is carried out by automated means

Where responding to such a request, we would provide the personal data in a structured, commonly used, machine-readable format within one month of receiving your request. If your request is complex or requires more time, we may extend this period by up to a further two months.

- **Right to Object:** Individuals have the right to object to:
  - \*processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority(including profiling)
  - \*direct marketing(including profiling)
  - \*processing for purposes of scientific/historical research and statistics
  - \*direct marketing

If you exercise your right to object, we will stop processing your personal data unless:

- \*there are compelling legitimate grounds for us to continue to process, which override your interests, rights and freedom
- \*the processing is for the establishment, exercise or defence of legal claims

You can exercise your right to object at the first point of contact with us or any other time by contacting us as detailed below. If exercising your right to object affects or prevents us from being able to provide you with one or any of our services we will inform you.

Automated decision making including profiling: Sometimes it is necessary for us to approach a lender to obtain an initial decision for a mortgage(often referred to as a Decision in Principle-DIP). To obtain a DIP we may process your personal information through a lender's automated decision making system which will provide an initial lending decision based on logic/algorithms programmed into it. We will always gain your consent before completing a DIP. Whilst we don't set or determine the logic/algorithms used in the automated decision system, we can put you in touch with the respective lender should you require it.

- **Withdrawal of Consent:** Where we are relying on your consent to process your personal data, you may withdraw your consent at any time. However this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

To exercise any of your rights detailed above you can contact us below:

Data Protection Officer  
 Landlord Mortgages Ltd  
 Oaklands Farm  
 Forges Lane  
 Eversley  
 RG27 0RB

**Email:** [landlordmortgages@btinternet.com](mailto:landlordmortgages@btinternet.com) or [info@lml.co.uk](mailto:info@lml.co.uk)

**Call:** 0118 9734771

We take the privacy of your personal information very seriously. If you ever feel you need to **complain** about how we have handled your personal information and data you can contact us as follows:

**In Writing:**

Lee Grandin  
Landlord Mortgages  
Oaklands Farm  
Forges Lane  
Eversley  
RG27 0RB

**Email:** [landlordmortgages@btinternet.com](mailto:landlordmortgages@btinternet.com)

**Call :** 0118 9734771

If your complaint is about the administration, or terms and conditions of a product sold by us, but provided by a lender/insurer, you may need to contact them about it.

If you are still unhappy with any aspect of how we handle your personal information, you also have the right to contact the Information Commissioner's Office (ICO). The ICO is the UK's independent body set up to uphold information rights. You can contact it as follows:

**Via its website:**<https://ico.org.uk>

**In writing:**

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

**Call :**0303 123 1113

**Use of Cookies:**

Cookies are very small text files that a website saves to your computers hard disk. The purpose of a cookie is to store any information that you have give about yourself, or to save your preferences. Cookies will not store any personal or confidential information about you.

At basic levels cookies will :

- Allow our website to work properly, and help keep it secure
- Help us understand how people us the website
- Make the site easier to use by remembering information that you have entered
- Improve your experience by showing you information that's relevant to you.

To ensure you get the best from our website, we advise that users keep cookies active on their machine whilst visiting our website. You may not be able to access certain existing client features or apply for new products if you browse with cookies disabled. However if you wish to restrict or block cookies which are set by Landlord Mortgages, or indeed any other website, you can do this through your browser settings. The help function within your browser should tell you how. For more information on how to delete cookies visit [www.aboutcookies.org](http://www.aboutcookies.org)(<https://www.aboutcookies.org>)

The list of the main cookies use by Landlord Mortgages:

**Cookie Name:****Purpose**

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\_utma

Source: Google Analytics  
Type: Performance  
Info: [https://cookiepedia.co.uk/cookies/\\_utma](https://cookiepedia.co.uk/cookies/_utma)  
([https://cookiepedia.co.uk/cookies/\\_utma](https://cookiepedia.co.uk/cookies/_utma))



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_utmz	Purpose Source: Google Analytics Type: Performance Info: <a href="https://cookiepedia.co.uk/cookies_utmz">https://cookiepedia.co.uk/cookies_utmz</a> ( <a href="https://cookiepedia.co.uk/cookies/_utmz">https://cookiepedia.co.uk/cookies/_utmz</a> )
wp-settings-(cookienamename) wp-settings-time-(cookienamename)	Source: WordPress Type: Functionality Info: These cookies are used to customise the your view and experience of the website

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## Summary

If you are unsure of any of the terms set out in the Privacy Policy, please do not hesitate to contact us on the details below. We respect your privacy, and take every effort to ensure the security of information you share with us confidentially, is secured.

All storage, use and transmission of personal information relating to an individual or a Company are subject the Data Protection Act\*

Please visit the following website for guidelines on data collection and your rights [www.ico.gov.uk](http://www.ico.gov.uk)

\*And any amended legislation