

# Data Protection

Your privacy is of utmost importance to us. This leaflet explains how Three Keys Mortgages and your Adviser use your personal information and outlines the ways we protect your privacy. It also describes your rights under the General Data Protection Regulations (GDPR).

## Collecting information and protecting your privacy

Our aim is to offer advice that helps you plan your financial future. To provide such advice, we need to know about your personal situation and your Adviser may request sensitive and private information about you, for example, your income, current financial arrangements, health, family commitments and any legal proceedings you may be involved in. Much of the information you provide will, as part of your application, be passed to the company whose products you apply for and details of how they use your information are included in their data protection literature.

If you are unable or unwilling to provide some or all of this information, your Adviser will be unable to provide you with advice suitable for your circumstances. We do not collect personal information from third parties.

Three Keys Mortgages is committed to protecting your privacy. As we would like you to be a lifetime client, we need to earn your trust and assure you that we will keep your personal information confidential and secure and only for as long as is necessary.

The criteria we use to determine how long this period is can be obtained from Capital Finance's Data Protection Officer at the address below. We will use it with care and it will only be shared in the ways explained in this leaflet, or if we are required to by Law or the Financial Conduct Authority (FCA).

## Purpose and Retention of Personal Information

Your personal information will only be held for as long as necessary and collected for the purposes of providing advice in respect of the range of products and services outlined in the Initial Disclosure Document or Client Proposition Brochure provided by your Adviser.

In addition, we will make every effort to ensure that the information you provide is recorded accurately and that it is only passed to companies who comply with the General Data Protection Regulations (GDPR).

If it is required to send your information abroad, we will only do so to countries within the European Union (EU) or to a third country that the EU has determined provides an adequate level of protection and where you are able to exercise your rights to access your personal information under the GDPR.



## Controlling and using your personal information

A Data Controller is someone who determines the purposes for which and the manner in which your personal data should be processed.

Three Keys Mortgages, Capital Finance - its Appointed Representatives, (your Adviser) and the companies whose products you buy are all Data Controllers. Your Adviser will have given you their contact details and Capital Finance's contact details are shown at the end of this document.

We use your information in a variety of ways:

- To introduce you to a range of products and services offered by the companies we are associated with (or may be associated with in the future).
- Assist with administration
- Keep you informed about changes to products you have purchased
- Conduct business analysis and research
- Market products and services that may be suitable for you (unless you ask us not to)
- Comply with the Law and FCA requirements
- To verify your identity by searching publicly available records held by credit reference agencies.
- To prevent fraud and money laundering we may pass your details to other companies, public bodies including the police or to an insurer's database. Insurance companies can search databases for any relevant information that exists about you.

We therefore process your data because it is necessary for:

- The performance of a contract to which you are a party.

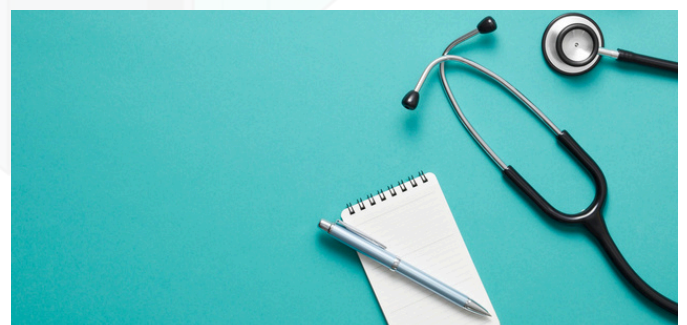
- Compliance with legal obligations to which we as the controller are subject.

None of the information gathered about you will be used in automatic decision making.

## Handling Health Information

If you apply for some types of insurance (eg. life insurance, pensions, sickness etc) you will be required to provide details of your health. Under the GDPR, this is regarded as sensitive personal data. Your Adviser will have access to your medical details unless you prefer to complete a medical statement of health in private. If this is the case, please send it with your application marked for the attention of the "Consultant Medical Officer" in a sealed envelope.

We need your explicit consent to collect and process your health details, which of course you may withdraw at any time. To provide this consent, please sign below and provide one copy of this form to your Adviser. Signing this form will also indicate that you have read and understood the provisions set out.



## Mortgage credit checking

If you apply for a mortgage your information will be passed to the lender, who will carry out a credit check. You will also have to provide details of any criminal convictions you may have had. These details will be passed to the lender to carry out any necessary checks.

## Marketing and sharing your information

The information you give us will be added to any other details we hold about you. Three Keys Mortgages will never sell your details to a third party, but we may share your information with carefully selected companies we are associated with. Therefore, we (or they) may contact you (by post, email, telephone or other appropriate means) to tell you about products, services or offers we believe may interest you. The products and services may not be related to financial services. You can ask us not to contact you for this reason, at any time, by writing to us at our Head Office. This will not affect your relationship with your Adviser.

We may have to pass your details to another Adviser if, for example your Adviser is ill or you need advice in a different product area. If your Adviser leaves we may pass your details to another Adviser so that we can continue to provide you with a high standard of service.

We may send your information to third parties that are carrying out work on our behalf.

## Your Data Protection rights

You have certain rights under the GDPR. These include the right to:

- Ask for a free copy of your personal information in a portable format.
- Stop us sending you marketing material about products and services.
- Have any incorrect information we hold about you corrected.
- Ask us to restrict processing of your personal data.

As the processing of your personal information is necessary for a legal obligation placed upon us by the FCA and may be required for the establishment, exercise or defence of legal claims, we will not be able to permanently delete your personal information until the end of the period we have deemed necessary.

### How to get more information

If you would like further details on how we use your personal information or if you have any data protection queries, please write to:

The Data Protection Officer  
Capital Finance  
81 Rivington Street,  
London,  
EC2A 3AY.

You may receive more information about data protection from the companies that we have introduced you to.

We may record telephone calls so we can check we have acted on your instructions correctly and to ensure we are giving you appropriate service. We may also monitor calls for security and training purposes.

## Complaints

If you have any complaints about the way we or your Adviser have handled your personal information, please contact the Data Protection Officer at the address given above.

You also have the right to refer your complaint to the Information Commissioner.