

Privacy Notice

Introduction

Active Investments (Reading) Ltd (Active Investments) are a mortgage packager who provides credit broking services to intermediaries in the UK and are committed to protecting your privacy. This Customer Privacy Notice, together with any document referred to within, sets out the basis on which we will use the personal information you supply to us directly yourself or supplied to us by a third party. Active Investments is responsible for forwarding personal information you supply to Lenders, Solicitors and Valuers. We are registered with the Information Commissioners Office under the UK Data Protection act 1998, registration number Z4717410.

Why should you read this document?

During the course of dealing with us, we will ask you to provide us with detailed personal information relating to you or your clients existing circumstances including financial situations and credit history. This document is important as it allows us to explain to you what we will need to do with the personal data collected, 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, your financial situation and credit history with 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 Mortgage/Finance 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 salary/bonus schemes/overtime/sick pay/other benefits), employment history
- Bank account details, tax information, loans and credit commitments, personal credit history, sources of income and expenditure, family circumstances and details of dependents
- Any pre-existing mortgage/finance products and the terms and conditions relating to these

Please note that we only use your data for financial solutions and do not require or use any sensitive data (such as medical records, religious beliefs etc)

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

When we communicate about your mortgage/finance requirements we do so on the basis that all parties are entering a contract for the supply of services.

In order to perform that contract, and to arrange the products required, we have the right to use Your Personal Data for the purposes detailed below.

Alternatively, either in the course of initial discussions 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 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.

How do we collect Your Personal Data?

We will collect and record Your Personal Data direct from the Broker/Intermediary most of the time. You will usually provide information during the course of the initial discussions to establish your circumstances and needs and preferences in relation to mortgages/finance with the full knowledge that your Broker/Intermediary will pass your personal data to Active Investments and its staff.

We may also obtain some information from third parties, for example, credit checks, information from your employer, and searches of information in the public domain such as the voters roll. If we use technology solutions to assist in the collection of Your Personal Data for example software that is able to verify your credit status. We will only do this if we have consent from you for us or our nominated processor to access your information in this manner. With regards to electronic ID checks we would 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?

In the course of 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). This information can only be accessed by 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 Mortgage Lenders/Commercial Lenders, 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 lenders and providers may raise.
- Use Your Personal Data for the purposes of responding to any queries you may have in relation to any mortgage/finance product you may take out, or to inform you of any developments in relation to those products of which we might become aware

Sharing Your Personal Data

Your Personal Data will be shared with:

- Mortgage/Finance Lenders
- Third parties who we believe will be able to assist us with your enquiry or application, or who are able to support your needs as identified. These third parties will include but may not be limited to, our Compliance Advisers, estate agents, solicitors, surveyors and valuers (in each case where we believe this to be required due to your particular circumstances).

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

When we proceed with a mortgage, loan or other plan or service for you and your data is transferred to a lender or provider, we recommend you also read their Privacy Notice in conjunction with ours. These Privacy Notices can be found on our website under the relevant Lender link.

Whilst these third parties are bound by the Data Protection Act, all credit searches are logged and added to your credit record and may affect your credit score. As a result, please be aware that this may then be visible by others undertaking similar searches. Please provide accurate and complete information wherever possible.

If your request for services has come from an introducer of business to Active Investments, we will share your information with the introducer for the purposes of keeping them informed as to how your application is progressing.

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 Customer Privacy Notice.

Security and retention of Your Personal Data

Your privacy is important to us and we will keep Your Personal Data secure 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 use third party software systems including cloud-based storage, to help us to manage mortgage, loan and product applications and to process and verify the personal information you supply to us. All software suppliers store any data in the UK and are subject to UK regulations including the UK Data Protection Regulations and are obliged to keep your details securely and use them only to fulfil the contracted service.

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 original documentation is being sent 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 such information we will retain records indefinitely.

Your rights in relation to Your Personal Data

You can:

- request copies of Your Personal Data that is under our control
- ask us to further explain how we use Your Personal Data
- ask us to correct, delete or require us to restrict or stop using Your Personal Data (details as to the extent to which we can do this will be provided at the time of any such request)
- ask us to send an electronic copy of Your Personal Data to another organisation should you wish
- change the basis of any consent you may have provided to enable us to market to you in the future (including withdrawing any consent in its entirety)

Marketing

We will seek your consent to provide you with general market news and updates and to inform you of any products and services offered by Active Investments and its associated companies that are not connected

with your specific mortgage, loan or other plan or service. If you use a service offered by Active Investments, you will not automatically be opted in to marketing without your consent.

We will obtain consent from you either verbally, via our website, via meetings face to face including shows and events, by email, or by completion of a consent form and will keep a record of your consent. You may unsubscribe at any time and you may also withdraw your consent at any time. You can refer to our full e-Marketing Policy together with our Website & Cookies Policy on our website www.active-investments.co.uk

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 in order to exercise any of your rights set out within it please contact:

Robert Hershaw - Compliance Manager, Active Investments (Reading) Ltd, First Floor, 6 Orpheus House
Calleva Park, Aldermaston RG7 8TA

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 in the first instance contact..

Robert Hershaw
Active Investments (Reading) Ltd
First Floor, 6 Orpheus House
Calleva Park
Aldermaston
RG7 8TA
Phone: 0118 945 2288
Email: info@active-investments.co.uk

You can also find our complaints procedure on our website www.active-investments.co.uk

Or you can 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.