

JAMES GAVIN FINANCE PRIVACY NOTICE

Our contact details

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E-mail: reception@jamesgavinfinance.co.uk

www.jamesgavinfinance.co.uk (17-08-2020)

The type of personal information we collect

We currently collect and process the following information:

- Personal identifiers, contacts and characteristics (for example, name and contact details);
- Financial information (for the purpose of combating fraud and money laundering);
- Health and medical information (for the purpose of providing insurance advice);
- Property informant (for the purpose of mortgage underwriting);
- See our privacy and cookies policy for details of information collected by our website.

How we get the personal information and why we have it

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- Mortgage advice, assessment/qualification and underwriting;
- Insurance advice, assessment/qualification and underwriting.

This information is collected on a 'contractual' basis to assist us with providing you with a mortgage and protection advice service.

We also receive personal information indirectly, from the following sources in the following scenarios:

- Lenders – Will provide us with necessary information to assist in providing advice, establishment of a lending product or the ongoing servicing of our customers;
- Insurers – Will provide us with necessary information to assist in providing advice, establishment of an insurance product or the ongoing servicing of our customers.

We use the information that you have given us in order to provide you with mortgage and/or insurance advice.

We may share this information with:

- Lenders (the specific lenders approached will be disclosed to you during the advice process);
- Insurance companies (the specific insurers approached will be disclosed to you during the advice process);
- The Financial Conduct Authority (regulatory purposes);
- The Information Commissioner's Office (law enforcement);
- National Crime Agency (Law enforcement)
- Other law enforcement bodies (law enforcement);
- Customer Relationship Management and Product Sourcing Systems (day to day processing of your data).

Under the General Data Protection Regulation (GDPR), the lawful bases we rely on for processing this information are:

- **We have a contractual obligation;**
- **We have a legal obligation;**
- **We have a legitimate interest.**

How we store your personal information

Your information is securely stored in electronic format using our customer relationship management system, The Key.

Additionally, we also make use of market leading product sourcing technology provided by Mortgage Brain, Trigold, iPipeline and AIR sourcing.

We keep the above personal information for as long as is necessary to fulfil our regulatory and legal responsibilities. This means that we will retain your information for as long as you are legally able to file a complaint or as long as we have a legal obligation to do so under Anti-Money Laundering legislation. We will then dispose your information by permanently deleting from our files.

Your data protection rights

Under data protection law, you have certain rights; including:

- **Your right of access** - You have the right to ask us for copies of your personal information.
- **Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.
- **Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- **Your right to object to processing** - You have the right to object to the processing of your personal information in certain circumstances.
- **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, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at: dpo@therightmortgage.co.uk if you wish to make a request.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at dpo@therightmortgage.co.uk

You can also complain to the Information Commissioner's Office [ICO] if you are unhappy with how we have used your data.

The ICO's address:

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

Helpline number: 0303 123 1113

ICO website: www.ico.org.uk