

Customer Privacy Notice - 2018 Edition

How Precise Mortgages uses your personal data

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About Us



Precise Mortgages is a trading name of Charter Court Financial Services Limited which is part of the Charter Court Group. The Charter Court Group is made up of Charter Court Financial Services Group plc and its subsidiary companies Charter Court Financial Services Limited, Charter Mortgages Limited, Exact Mortgage Experts Limited and Broadlands Finance Limited. Charter Court Financial Services Limited also trades under the name of Charter Savings Bank.

Charter Court Financial Services Limited will be a data controller of any personal data it holds about you and the loan(s) you have with us. We may share this information with other parts of the Charter Court Group. Where this occurs, they will be a separate data controller in respect of that personal data, and this privacy notice will also apply to any processing they undertake, unless they provide you with an alternative privacy notice.

A data controller is an individual or organisation which decides how your personal data will be used. The data controller is referred to as "we", "us" and "our" in this privacy notice and includes successors in title and any other person who is for the time being entitled at law to the benefit of the loan or mortgage.

If you require any further information or wish to contact us or our Data Protection Officer at any time our contact details are:

Precise Mortgages 2 Charter Court Broadlands Wolverhampton WV10 6TD

0800 116 4385 (if your mortgage has not yet completed)

0800 298 5714 (after your mortgage has completed)

Email: thedataprotectionofficer@chartercourtfs.co.uk

Who this privacy notice applies to

This privacy notice explains how we will use the personal data of:

- > anyone who asks for a decision in principle on whether we would grant a loan to them;
- anyone who applies for or takes out a loan with us;
- anyone who becomes or applies to become a party to an existing loan;
- anyone who does or may guarantee a loan with us;
- > the directors, company secretary and shareholders of any company that takes out a loan with us, and
- anyone else whose personal data we capture during the course of an application for or the administration of a loan e.g. persons occupying property which is security for the loan, professional advisers, persons representing you and others.

Each such person is referred to as "you" and "your" in this privacy notice.

Why we are providing you with this privacy notice

Applicable Data Protection laws (including the General Data Protection Regulation 2016 and the Data Protection Act 2018), impose obligations on us as the data controller, when we collect or create, hold, amend, disclose, share or otherwise use or erase/destroy (collectively referred to as processing) your personal data and give you, as the data subject, rights over your personal data.

One such obligation is to process, (e.g. collect, hold, use or erase) your personal data fairly, lawfully and in a transparent manner. This privacy notice meets that obligation by explaining what personal data we will hold about you, how we will process your personal data, why we process your personal data and the lawful grounds on which we are processing it. It also sets out some of your legal rights.

We may change this privacy notice in the future. If we make any substantial and/or material changes and those changes materially affect you, we will inform you of any changes before they take effect.



We will receive personal data about you from a variety of sources including from you, other applicants, the mortgage intermediary acting for you, other persons who represent or advise you, your bank or building society, your employer and former employers, credit reference agencies, fraud prevention agencies, solicitors, valuers, persons working on our behalf, market researchers, local and national government, tax and law enforcement agencies and other companies within the Charter Court Group. We will also create personal data about you during the course of the application for a loan and our administration of any loan you have with us. We may also obtain data about you that is publicly available such as from the Electoral Register, the Internet, Companies House and the Land Registry.

The types of personal data we will have about you

Personal data

We may process a wide variety of data about you, where necessary, for the purposes set out in the "How We Will Use Your Data" section, including data about:

| you as an individual | name, title and address (including previous names and addresses) |
|---|--|
| | other contact details including email addresses and telephone numbers |
| | gender, date of birth and marital status |
| | expected retirement age |
| | nationality |
| | national insurance number |
| | ► tax code |
| your employment | employer(s) and previous employers |
| | length of employment |
| | ▶ role |
| | salary and other forms of income |
| | directorships and shareholdings you hold |
| people connected to you | ▶ your family |
| | other people who live with you or in the property which is security for the loan |
| | your advisers and representatives |
| your finances and the | > your bank account details (account number and sort code) including payments to and from your accounts |
| finances of any business | the accounts and finances of any business you run |
| you run | your income, assets, loans, credit cards and other liabilities you may have |
| | properties you own or are owned by companies of which you are a shareholder or director |
| | your accounts with other creditors which are to be repaid from any loan we make or are secured against the property which is to be security for our loan to you including details of the creditor, terms of the loan, account/card number and sort code |
| your accounts, products and services you have with us | ▶ your account number |
| | the amount of your loan, its terms and how you will repay it |
| | payments to or from your loan account |
| | the purpose of the loan |
| | the property or properties which will be security for the loan |
| your preferences | whether you wish to receive marketing from us or prefer information in alternative formats e.g. braille or large print |
| your technology | device identifiers including IP address |
| your profile | including an assessment of you, your financial situation and the likely performance and repayment of your loan |
| your correspondence and documents we hold | documents we hold (e.g. Driving Licence, Passport, Birth Certificate, evidence of how you intend to repay an interest only loan at the end of its term), correspondence or communications received or sent and the information contained within them |
| your criminal convictions and the results of checks we are required by law to undertake | any convictions |
| | whether you are a Politically Exposed Person and/or subject to financial sanctions. |
| | |





Special category data

Some personal data for example data about your health, racial or ethnic origin is subject to additional rights and are described as special category data. We will not normally ask for or record this special category data but we may ask for and record details about your health if it is necessary and relevant for the management of the account (e.g. so we can make reasonable adjustments to assist you in accessing and managing your account(s), which may include sending you information in braille or large print, or if we think you are experiencing circumstances which may lead you to be financially or otherwise vulnerable).

We will only do this if you have confirmed your consent to us doing so, or where we are legally permitted or required to process this information without seeking your consent. You are not contractually required to provide this information, and where we have obtained your consent to us processing special category data in this way, you are entitled to withdraw your consent to this at any time. Please contact us if you wish to do so but that may affect our ability to manage your account in the most appropriate way for you. If you withdraw your consent, we will not continue to process this information for those purposes, but it will not impact the validity of any processing undertaken before you withdrew your consent.

How we will use your data



| consider your application | this will include to: |
|---|---|
| consider your application for a loan or request for a decision in principle | assess whether we think the loan can be afforded, determine whether we are willing to make a loan and if we are, the terms of that loan |
| | undertake a credit assessment which will include credit scoring |
| | check your identity |
| | liaise with your mortgage intermediary to progress the application for a loan or request for a decision in principle |
| | liaise with the solicitor advising us on the loan including to ensure that the property or properties which will be security for the loan meet our requirements, the terms of any mortgage offer are met and we will have a charge over that property or properties |
| | obtain a physical or automated valuation of the property or properties which will be security for the loan and any other properties which you, or a company of which you are a director or shareholder, own to enable us to assess the amount of the loan, if any, which we are prepared to make |
| manage our relationship | this will include to: |
| with you, to administer and | contact you about the loan |
| provide the loan and other products and services you | make payments and process repayments of the loan |
| have with us | manage fees, charges and interest due |
| - | make arrears management decisions |
| | collect and recover any money owing to us |
| | locate you |
| | consider requests you and other persons make of us to decide whether we will agree to the request being made or provide the information requested |
| | ensure that we have a valid and enforceable charge over property which is, or is intended to be, security for the loan, with the priority we expected and that the title to that property is and continue to be good and marketable |
| | exercise our rights under the terms of our loan including obtaining possession of the property and we do, to sell the property subject to our charge |
| | to appoint a receiver if the loan is secured on a property that the borrower doesn't live in |
| | link the loan to other products and services you, or a company of which you are a director or shareholder have with us |
| | create records, produce correspondence and other documents and provide information to you and other persons |
| | correct inaccurate data held by us and third parties |
| | identify circumstances which may make you vulnerable so that we can take account of this in our dealings with you |
| | update, consolidate and improve the accuracy of our records |
| | monitor and analyse the performance of your account with us |
| | consider any future applications you make for a loan or requests for a decision in principle |
| | tell you about products and services offered by us which we think may be of interest to you (furthe information on this is provided below) |
| ensure that we have the information we need to consider your application or decision in principle and to administer the account and that other persons have the information they reasonably need | this will include to: |
| | obtain additional information about you that is publicly available or by making enquiries, searches, requesting references and other information that we consider necessary (including to confirm the truth and accuracy of your personal data, to decide whether to make a loan and to administer the loan with us) from you and other persons including your mortgage intermediary, tax authorities, past/present employers, landlords, accountants, lenders, insurers, bank/building society, the Benefits Agency, Land Registry, Companies House, social media, fraud prevention agencies and credit reference agencies |
| | contact, obtain or provide information about you from or to debt management companies, trustees in bankruptcy, supervisors of individual voluntary arrangements and personal representatives |
| | contact, obtain or provide information about you from or to any other lender or person who has or may have a charge over or other interest in the property which is security for the loan |
| identify and prevent financial crime | this will include to: detect, prevent, investigate and/or report suspected money laundering, fraud, bribery, corruption |



| comply with our legal, contractual and regulatory obligations, codes of practice and to run our business | this will include to:share data about you and the conduct and operation of the loan during its term and after it is repaid |
|---|--|
| | with: |
| | any guarantor or intended guarantor of the loan; |
| | our regulators, the Bank of England and ratings agencies; |
| | our investors or potential investors, funders and their advisers; |
| | any prospective purchaser of us, seller to us or party seeking to merge with us or any person who does or wishes to fund or otherwise be involved in any such transaction and their representatives; |
| | any person who was previously the lender or who has an interest in the loan, their representatives and advisers; |
| | any person or organisation who does, or who we believe wishes to, enter into an acquisition of your mortgage or who does or wishes to fund or otherwise be involved in such an acquisition, their advisers and representatives. An acquisition may occur if we mortgage, sell, transfer, assign, charge or otherwise dispose of, in whole or in part any loan, mortgage, or other related security to any person or organisation. Such an acquisition will involve us transferring all or some of the rights that we have under the loan, or the related security to another person or organisation; |
| | any organisation that participates or intends to participate in a corporate finance transaction we undertake or intend to undertake, but only where necessary for the purposes relating to those transactions including to enable those organisations to exercise rights they have and to review loan files, or |
| | credit reference and fraud prevention agencies who in turn will provide data to us, (further information on this is provided below) |
| | identify if you, a close associate or relative are subject to financial sanctions or are considered politically exposed |
| | provide data, reports and returns to our regulators, other statutory bodies, our trade bodies or when required by a court order or other legal or contractual obligation |
| | manage, monitor, analyse, develop, forecast and report on the performance of our businesses, suppliers and other third parties including accounting and auditing |
| | manage how we lend and use our resources |
| | manage risk for us and our customers |
| | seek advice from our advisers |
| | pay fees to the introducers of business to us and to provide them with management information on the performance of their business |
| | comply with any other legal obligation imposed on us, including where you have sought to exercise your legal rights |
| develop and improve our products and services | this will include to: |
| | test products and services |
| | obtain your feedback on the products and services we provide |
| | undertake market research |
| | ensure that we meet high standards of customer service, including monitoring calls and training staff |
| undertake analysis, produce models, statistics, reports and forecasts | this will include to: |
| | predict your economic situation and/or future behaviour |
| | analyse and model the likely future performance of your loan and other loans that we may make or be asked to make in the future |
| investigate and respond to complaints, disputes and where necessary to bring or defend legal claims | this will include to: |
| | identify and document facts and evidence |
| | investigate and respond to complaints, disputes, regulatory investigations and/or to bring or defend legal claims |
| | allow us to ensure that we offer the highest standard of customer service, by identifying if we have provided any inadequate service and the causes of such failings, and to determine how to avoid any repeat of that situation and improving our services. |

How we use your personal data to make automated decisions



Sometimes we will make an automated decision. These help to ensure that our decisions are quick, fair and efficient based on the personal data we have about you including data we receive from credit reference and fraud prevention agencies. The type of automated decisions we make are:

- > to check whether you meet the conditions required to open the account you have applied for;
- to check your identity;
- to create a profile of you;
- > to decide whether we will make a loan and the terms of any loan;
- to decide whether we will offer additional products and services or the opportunity to vary existing products or services and the terms of any such products, services or variation;
- > to identify when there may be a risk of the terms of the loan being breached, or
- to decide how we will manage the account when the terms of the loan have been breached or we consider there is an increased risk that a breach may occur.

These automated decisions may also take into account details of any products you already have with members of the Charter Court Group and/or any assessment of your financial status and risks we have undertaken.

You may ask us not to make automated decisions about you by contacting our Data Protection Officer, or ask us to review any automated decision that we have made taking account of any additional information you wish to provide to us.

Call recording

We may record and/or monitor telephone calls with you for the following purposes:

- for security, quality and/or training purposes;
- to confirm that we have complied with your instructions;
- to resolve or investigate any queries;
- to comply with our legal obligations, or
- > to prevent fraud or other criminal activities.

Marketing

Charter Court Financial Services Limited may contact you about products or services offered by it by post, electronic mail, telephone, SMS text messaging and any other online or interactive media if, when we collected your personal data, we gave you the option not to receive such communications and you did not ask us not to send such communications to you.

If at any time you change your mind and either do wish to receive such communications or wish us to stop sending such communications then please email us at <u>marketing@precisemortgages.co.uk</u>.

The legal grounds on which we will process your data



We will only process your personal data if we have a reason to do so that is legally permitted. When using your personal data for the purposes listed above we are relying on one or more of the following legal reasons for processing that data:

- the purpose is necessary for the performance of a contract with you or, if you asked us to, to enable us to enter into a contract with you;
- the purpose is necessary for us to comply with our legal obligations;
- > the purpose is necessary for our legitimate interests, or
- > if you have consented to us processing personal data for one or more specified purposes.

The legitimate interests we have for processing your personal data as described above include to:

- comply with our legal and contractual obligations, best practice and codes of practice;
- exercise our legal rights;
- prevent financial and other crime;
- meet your expectations of us;
- enhance and develop the products and services we provide to you;
- develop and improve our business, products and services and the terms which apply to them;
- undertake analysis, modelling and forecasting;
- manage and mitigate the risks to you and our business;
- keep our records up to date and to enable us to link your different accounts with us together;
- ensure that persons that are affected if the terms of the loan are not met are provided with information about the loan with us which is appropriate to their circumstances. This will include parties to the loan, guarantors, persons with an interest or claiming an interest in the property which is security for the loan such as occupiers and other lenders with a charge secured on the property;
- ensure we have sufficient information to consider any request for a decision in principle/application or to administer the loan;
- verify the information provided to us to ensure its accuracy;
- be efficient in running our business, providing our products and services, fulfilling our legal obligations and meeting expectations of us;
- contact existing customers about other products and services we offer;
- > ensure our business is profitable and has adequate levels of capital and funding, or
- facilitate investment in, and the growth of, our business.

Any special category data will only be processed where it is necessary and only:

- with your prior explicit consent;
- where permitted by law to protect your well-being, or
- for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity.

Any personal data on criminal convictions will only be processed to:

- prevent fraud;
- to comply with our legal obligations under anti Money Laundering and Financial Sanctions Legislation, or
- decide whether to make a loan to you.

Who we share your data with



We may share your personal data with other companies within the Charter Court Group and with:

- > you, your representatives and advisers including your mortgage intermediary, solicitor and accountant;
- companies which your mortgage intermediary is associated for example because they are responsible for your mortgage intermediary's compliance with legal obligations or your mortgage intermediary has chosen to submit your application through or in connection with them;
- parties to the loan, any guarantor of the loan, the company secretary, directors and shareholders of any company that is party to the loan;
- > any other person you ask us to provide information to;
- your past/present employers;
- your and our insurers;
- your bank, building society and landlord;
- your personal representatives;
- > debt management companies, your trustee in bankruptcy or the supervisor of an Individual Voluntary Arrangement;
- our bank, BACS and the Direct Debit Scheme;
- any occupier of the property and other persons who have or may have an interest in any property which is or is intended as security for a loan;
- the freehold owner or management company of any leasehold property that is security for the loan, their representatives and advisers;
- > our advisers including valuers, solicitors, accountants and auditors;
- Law of Property Act receivers;
- central and local government;
- the Financial Ombudsman Service, courts and any arbitrator or adjudicator of a dispute involving us;
- statutory and regulatory bodies including tax authorities, HMRC, Benefits Agency, Information Commissioner's Office, Prudential Regulation Authority, Financial Conduct Authority, European Central Bank and Bank of England;
- credit reference agencies and fraud prevention agencies;
- law enforcement agencies;
- credit rating agencies;
- market research companies;
- any investor, potential investor, funder, purchaser in or of our business or any part of our business (including your mortgage) and their advisers;
- organisations involved in any corporate finance transaction which we undertake or intend to undertake including, but not limited to, underwriters, loan servicers, trust managers and security trustees;
- > any business with which we are seeking to merge and their advisers;
- any previous lender, or
- > agents and suppliers who act or may act on our behalf.

How long we will hold your data for

We will usually keep your personal data for 7 years from the later of the date a decision in principle is requested, an application for a loan is withdrawn or declined or any loan is repaid. We may retain the data for longer where it is necessary for us to do so to meet our legal or regulatory obligations, for research or statistical purposes or technical reasons.

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In order to process the application or request for a decision in principle, we will perform credit and identity checks on you with one or more credit reference agencies ("CRAs").

To do this, we will supply your personal data to CRAs and they will give us data about you. This will include information from your credit application and about your financial situation and financial history. CRAs will supply to us both public (including the Electoral Register) and shared credit, financial situation and financial history information and fraud prevention information.

We will use this information to:

- assess your creditworthiness and whether you can afford to make repayments;
- verify the accuracy of the data you have provided to us;
- prevent criminal activity, fraud and money laundering;
- manage your account(s);
- trace and recover debts, or
- ensure any offers provided to you are appropriate to your circumstances.

We will continue to exchange information about you with CRAs while you have a relationship with us. We will also inform the CRAs about your settled accounts. If you borrow and do not repay in full and on time, CRAs will record the outstanding debt. This information may be supplied to other organisations by CRAs.

When CRAs receive a search request from us they will place a search footprint on your credit file that may be seen by other lenders.

If you are making a joint application, or tell us that you have a spouse, partner or financial associate, we will link your records together, so you should make sure you discuss this with them, and share with them this information, before lodging the application. CRAs will also link your records together and these links will remain on your and their files until such time as you or your partner successfully files for a disassociation with the CRAs to break that link.

The identities of the CRAs, their role also as fraud prevention agencies, the data they hold, the ways in which they use and share personal data, data retention periods and your data protection rights with the CRAs are explained in more detail at http://pdf.precisemortgages.co.uk/crain_document.pdf.

CRAIN is also accessible from each of the three CRAs – using any of these three links will also take you to the same CRAIN document:

 Callcredit:
 https://www.callcredit.co.uk/crain

 Equifax:
 https://www.equifax.co.uk/crain

 Experian:
 http://www.experian.co.uk/crain/index.html

Fraud Prevention Agencies

Before we provide services, goods or financing to you, we undertake checks for the purposes of preventing fraud and money laundering, and to verify your identity. These checks require us to process personal data about you.

Your personal data will be used to prevent fraud and money laundering, and to verify your identity.

We and fraud prevention agencies may also enable law enforcement agencies to access and use your personal data to detect, investigate and prevent crime.

We process your personal data on the basis that we have a legitimate interest in preventing fraud and money laundering, and to verify identity, in order to protect our business and to comply with laws that apply to us. Such processing is also a contractual requirement of the services or financing you have requested.

Fraud prevention agencies can hold your personal data for different periods of time, and if you are considered to pose a fraud or money laundering risk, your data can be held for up to six years.

Consequences of processing

If we, or a fraud prevention agency, determine that you pose a fraud or money laundering risk, we may refuse to provide the services and financing you have requested or we may stop providing existing services to you.

A record of any fraud or money laundering risk will be retained by the fraud prevention agencies, and may result in others refusing to provide services, financing or employment to you. If you have any questions about this, please contact us on the details above.

Data Transfers

Fraud prevention agencies may transfer your personal data outside of the European Economic Area. If they do so they will impose contractual obligations on the recipients of that data to protect your personal data to the standard required in the European Economic Area. They may also require the recipient to subscribe to 'international frameworks' intended to enable secure data sharing.



If you choose not to give us personal data

Where you will be a party to the loan or guarantor of the loan you will need to provide us with the personal data we request either to enable us to consider your request for a decision in principle/application or to administer the loan.

If you don't give us the information we request then it may prevent us from being able to respond to your request or provide a decision or loan to you. It may also affect our ability to meet our contractual or legal obligations.

Your legal rights

You have a number of rights over your personal data processed by us. These include your rights to request:

- access to your personal data. You may request a copy of the personal data that we hold about you.
- accuracy of your personal data. You may request that we correct incomplete, inaccurate or outdated personal data. We take sensible steps to make sure that personal data is accurate, complete, and current. You can help us do this by notifying us of any changes to your personal data.
- transmission of personal data. You may request that we transfer personal data you have provided to us to you or to another person.
- > erasure of personal data. You may request that we delete your personal data.
- that the processing of your personal data be restricted. You may request that our use of your personal data ends, is restricted or limited.

The extent of these rights are limited by law and we may not act on part or all of your request(s) where the right(s) are not applicable. If we do not act on your request we will explain our reasons for not doing so when responding to your request.

If you require any further information about how we handle your personal data, including details of the relevant fraud prevention agencies we use, or wish to make a request to exercise any of your rights under applicable Data Protection laws, please contact our Data Protection Officer.

Sending your personal data outside the United Kingdom and the European Economic Area

Your personal data may be processed or transferred outside the United Kingdom and the European Economic Area.

If you require further information as to where your personal data is transferred to, and the measures we have implemented to safeguard that information, please contact our Data Protection Officer.

How to complain

If you are unhappy with the outcome of any of your requests to exercise your rights, or how we handle your personal data then please let us know.

You are also entitled to complain to the Information Commissioner's Office:

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF Email: <u>Casework@ico.org.uk</u>

Tel: 0303 123 1113

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We can provide literature in large print, Braille and audio tape. Please ask us for this leaflet in an alternative format if you need it.

Precise Mortgages is a trading name of Charter Court Financial Services Limited which is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority (Financial Services Register Firm Reference Number 494549). Registered in England and Wales with company number 06749498. Registered office: 2 Charter Court, Broadlands, Wolverhampton WV10 6TD.

