

## Privacy Policy

### Data Privacy Notice

We take your privacy very seriously and we ask that you read this privacy notice carefully as it contains important information on who we are, how and why we collect, store, use and share personal data, your rights in relation to your personal data and on how to contact us and supervisory authorities in the event you have a complaint.

Cheap Mortgage Quotes collects, uses and is responsible for certain personal data about you. When we do so we are required to comply with data protection regulation and we are responsible as a data controller of that personal data for the purposes of those laws.

When we mention “Cheap Mortgage Quotes”, “we”, “us” or “our” we are referring to James Savage, whose registered office is at 180 Henvy Road, Newquay, Cornwall, TR7 3EH.

James Savage (trading as Cheap Mortgage Quotes) is authorised and regulated by the Financial Conduct Authority. Financial Services Register number is 830366.

James Savage is an Appointed Representative of Cornerstone Finance Group Ltd which is authorised and regulated by the Financial Conduct Authority. Financial Services Register number is 767272. Cornerstone Finance Group Ltd is registered in England and Wales No. 08458702.

In the course of providing our service to you we may collect the following personal data when you provide it to us:

- Contact information
- Identity information

- Financial information
- Employment status
- Lifestyle information
- Health information
- Data about criminal convictions or offences
- Details of any vulnerability
- Details of your dependents and/or beneficiaries under a policy **(If you are providing information about another person, we expect you to ensure that they know you are doing so and are content with their information being provided to us. You might find it helpful to show them this privacy notice and if they have any concerns, please contact us in one of the ways described below.)**
- Product details

We also obtain personal data from other sources in the course of providing our intermediary services. Where we obtain this information from another party it is their responsibility to make sure they explain that they will be sharing personal data with us and, where necessary, ask permission before sharing information with us.

The personal data we obtain from other sources may include the following:

- From lenders and/or product providers:
  - product details
- From identification and verification checking agencies:
  - identity information
  - sanction check information

The primary reason we will process your data is to perform our contract with you and to support and maintain that relationship. This includes the following:

- assessing and processing an application for our services;
- providing our products and/or services to you, including the management of our relationship with you, your firm;
- carrying out transactions you have requested or on your behalf;
- monitoring or recording communications (such as telephone and video calls) with you to resolve any queries or issues and also for training and quality purposes and, in some cases to comply with regulatory requirements;
- assessing your application for products (using automated decision-making tools when necessary);
- ensuring that a firm's operation meets our expectations, and those of our regulators (such as undertaking audits and investigations into network activity);
- record keeping in order to ensure our products and/or services operate within the law and relevant regulatory requirements;
- providing other services (e.g. enhanced due diligence and payments or reporting of any tax or levy).

To comply with legal and regulatory requirements. These requirements include the following:

- confirming your identity for security and regulatory purposes;
- detecting and preventing fraud, money laundering, terrorist financing, bribery or other malpractice;
- to meet tax reporting obligations such as Common Reporting Standards (CRS) and the US Foreign Account Tax Compliance Act (FATCA);
- to fulfil our data protection obligations.

For specific business purposes to enable us to provide you with appropriate products and services and a secure experience. Our business purposes include the following:

- verifying your identity for security purposes;
- sending marketing communications to you which you have opted into receiving, or which are related to similar products or

- services, or which we think may interest you based on the relationship you have with Us or other companies in our group;
- enhancing, modifying and personalising our services for your benefit;
  - to undertake Profiling activities;
  - providing communications which we think will be of relevance or interest to you;
  - audit and record keeping purposes;
  - enhancing the security of our network and information systems;
  - maintaining effective management systems
  - ensuring the integrity of our systems (for example, during final stages of testing where it is necessary to use real data to ensure that any system improvements do not interrupt business or corrupt the data);
  - providing reports and other communications to you where we are required to do so;
  - customer satisfaction research, statistical analysis and wider market research to capture the views and opinions of our customers.

Certain types of personal data are considered more sensitive and so are subject to additional levels of protection under data protection legislation. These are known as 'special categories of data' and include data concerning your health, racial or ethnic origin, genetic data and sexual orientation. Data relating to criminal convictions or offences is also subject to additional levels of protection.

We may process:

- Health information and lifestyle information when providing intermediary services in relation to a protection insurance product; and/or
- Criminal conviction or offence information when providing intermediary services in relation to a general insurance product.

In addition to the lawful basis for processing this information set out in the above table, we will be processing it either (i) for the purpose of advising on, arranging or administering an insurance contract or (ii) for the establishment, exercise or defence of legal claims.

In the course of our activities relating to the prevention, detection and investigation of financial crime, we may process criminal conviction or offence information. Where we do so we will be processing it for the purpose of compliance with regulatory requirements relating to unlawful acts and dishonesty.

We may use personal data we hold about you to help us identify, tailor and provide you with details of products and services from us that may be of interest to you. We will only do so where we have obtained your consent and then have a legitimate business reason to do this and will do so in accordance with any marketing preferences you have provided to us.

In addition, where you provided your consent, we may provide you with details of products and services of third parties where they may be of interest to you.

You can opt out of receiving marketing at any time. If you wish to amend your marketing preferences, please contact us by phone on 02921 660 550, by email at [admin@cornerstonefinance.co.uk](mailto:admin@cornerstonefinance.co.uk), or by writing to our registered address.

In addition, you can opt out of receiving marketing at any time by clicking the 'unsubscribe' link at the bottom of every email.

We will tell you if providing some personal data is optional, including if we ask for your consent to process it. In all other cases you must

provide your personal data in order for us to provide you with intermediary services.

We will only keep your personal information as long as necessary. How long that is depends on the type of data however in most cases, your personal data will be stored for an indefinite period as we need to keep evidence that we have fulfilled our legal and regulatory requirements.

We will not transfer your personal data outside of the European Economic Area or to any organisation (or subordinate bodies) governed by public international law or which is set up under any agreement between two or more countries.

You have legal rights under data protection regulation in relation to your personal data. These are set out under the below headings:

- To access personal data
- To correct / erase personal data
- To restrict how we use personal data
- To object to how we use personal data
- To ask us to transfer personal data to another organisation
- To object to automated decisions
- To find out more about how we use personal data

We may ask you for proof of identity when making a request to exercise any of these rights. We do this to ensure we only disclose information or change your details where we know we are dealing with the right individual.

We will not ask for a fee, unless we think your request is unfounded, repetitive or excessive. Where a fee is necessary, we will inform you before proceeding with your request.

We aim to respond to all valid requests within one month. It may however take us longer if the request is particularly complicated or you have made several requests. We will always let you know if we think a response will take longer than one month. To speed up our response, we may ask you to provide more detail about what you want to receive or are concerned about.

We may not always be able to fully address your request, for example if it would impact the duty of confidentiality we owe to others, or if we are otherwise legally entitled to deal with the request in a different way.

#### **To access personal data**

You can ask us to confirm whether or not we have and are using your personal data. You can also ask to get a copy of your personal data from us and for information on how we process it.

#### **To rectify / erase personal data**

You can ask that we rectify any information about you which is incorrect. We will be happy to rectify such information but would need to verify the accuracy of the information first.

You can ask that we erase your personal data if you think we no longer need to use it for the purpose we collected it from you.

You can also ask that we erase your personal data if you have either withdrawn your consent to us using your information (if we originally asked for your consent to use your information), or exercised your right to object to further legitimate use of your information, or where we have used it unlawfully or where we are subject to a legal obligation to erase your personal data.

We may not always be able to comply with your request, for example where we need to keep using your personal data in order to comply with our legal obligation or where we need to use your personal data to establish, exercise or defend legal claims.

#### **To restrict our use of personal data**

You can ask that we restrict our use of your personal data in certain circumstances, for example

- where you think the information is inaccurate and we need to verify it;
- where our use of your personal data is not lawful but you do not want us to erase it;
- where the information is no longer required for the purposes for which it was collected but we need it to establish, exercise or defend legal claims; or
- where you have objected to our use of your personal data but we still need to verify if we have overriding grounds to use it.

We can continue to use your personal data following a request for restriction where we have your consent to use it; or we need to use it to establish, exercise or defend legal claims, or we need to use it to protect the rights of another individual or a company.

#### **To object to use of personal data**

You can object to any use of your personal data which we have justified on the basis of our legitimate interest, if you believe your fundamental rights and freedoms to data protection outweigh our legitimate interest in using the information. If you raise an objection, we may continue to use the personal data if we can demonstrate that we have compelling legitimate interests to use the information.

#### **To request a transfer of personal data**

You can ask us to provide your personal data to you in a structured, commonly used, machine-readable format, or you can ask to have it

transferred directly to another data controller (e.g. another company).

You may only exercise this right where we use your personal data in order to perform a contract with you, or where we asked for your consent to use your personal data. This right does not apply to any personal data which we hold or process outside automated means.

**To contest decisions based on automatic decision making**

If we made a decision about you based solely by automated means (i.e. with no human intervention), and the decision made by us produces a legal effect concerning you, or significantly affects you, you may have the right to contest that decision, express your point of view and ask for a human review. These rights do not apply where we are authorised by law to make such decisions and have adopted suitable safeguards in our decision making processes to protect your rights and freedoms.

**You can contact us for more information**

If you are not satisfied with the level of information provided in this privacy notice, you can ask us about what personal data we have about you, what we use your information for, who we disclose your information to, whether we transfer it abroad, how we protect it, how long we keep it for, what rights you have, how you can make a complaint, where we got your data from and whether we have carried out any automated decision making using your personal data.

**If you would like to exercise any of the above rights, please:**

- email our Data Protection Officer at [c.caulfield-jones@cornerstonefinance.co.uk](mailto:c.caulfield-jones@cornerstonefinance.co.uk) or write to our registered address;
- let us have enough information to identify you, e.g. name, address, date of birth;

- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- let us know the information to which your request relates.

We have appropriate security measures in place to prevent personal data from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal data to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

If you are not happy with the way we are handling your information, you have a right to lodge a complaint with the Information Commissioners Office. It has enforcement powers and can investigate compliance with data protection regulation ([www.ico.org.uk](http://www.ico.org.uk)).

We ask that you please attempt to resolve any issues with us before the ICO.

Please contact our Data Protection Officer if you have any questions about this privacy notice or the information we hold about you.

If you wish to contact our Data Protection Officer, please send an email to [c.caulfield-jones@cornerstonefinance.co.uk](mailto:c.caulfield-jones@cornerstonefinance.co.uk), or write to our registered address.

**contact information:** these are details that can be used to contact a person, including title, first name, surname, personal telephone number, fax, email address, home address, country, postcode or city of residence. This may also include work contact information such as work telephone number, fax, work email and work address

**data controller:** means a natural or legal person (such as a company) which determines the means and purposes of processing of personal data. For example, we are your data controller as we determine how we will collect personal data from you, the scope of data which will be collected, and the purposes for which it will be used in the course of us providing you with intermediary services.

**data protection regulation:** applicable data privacy and protection laws

**employment status:** this is information about your work, if you are employed, self-employed, unemployed, a student or on job seeker allowance.

**FCA:** the Financial Conduct Authority, being the independent watchdog that regulates financial services.

**financial information:** this is information relating to your financial status, including salary/income, outgoings/expenditure, tax rate and P60.

**health information:** this is information relating to your medical history, including symptoms, diagnoses, procedures and outcomes, as well as information about your height and weight. This could include previous and current or persistent medical conditions and family medical history.

**identity information:** this is any information that can be used to distinguish a person or verify their identity, such as name, date of

birth, place of birth, gender, marital status, national identity card/number, passport, drivers licence and national insurance number

**intermediary services:** these are the services we provide to you in relation to the products.

**lenders:** a mortgage lender (for a list of current lenders which we work with, please contact us – see How to contact us above)

**lifestyle information:** this includes both work and leisure behaviour patterns. Most relevant to your products may be your smoker status, alcohol consumption, health, retirement age and exercise habits.

**product:** this is a mortgage, protection and/or general insurance product in respect of which we provide intermediary services to you.

**product provider:** a company which provides investment, pension, protection and/or general insurance products (for a list of product providers which we work with, please contact us – see How to contact us above)

**sanction check information:** this is information relating to your politically exposed persons (PEPs) status and Her Majesty's Treasury financial sanctions status, which is recorded to prevent fraud and money laundering.

**vulnerability:** a vulnerable consumer is someone who, due to their personal circumstances, is especially susceptible to detriment, particularly when an advisory firm is not acting with appropriate levels of care. These customers are more likely to suffer severe detriment if something goes wrong. Details of vulnerability fall into the following categories: health; resilience (financial); life events; and capability (financial knowledge/ confidence)