Customer Privacy Notice

CMC Advice T/A Mortgage Health & Protect (our **Firm**, **we**, **our, us**) an Appointed Representative of PRIMIS Mortgage Network a trading name of **First Complete Limited**.

I have noted one minor change that's needed on the Privacy Policy – you just need to edit the Statutory Status Disclosure to only include 'First Complete Ltd'.

Why are we asking you to read this document?

During the course of dealing with us we will ask you to provide us with detailed personal information relating to your existing circumstances, your financial situation and, in some cases, your health and family health history (**Your Information**). We would like to e**xplain to you what we will need to do with Your Information**, and the various rights you have in relation to **Your Information.**

What do we mean by "Your Information"?

Your Information means any information describing or relating to you. Your Information may identify you directly, for example your name, address, date of birth, National Insurance number and the like. Your Information may also identify you indirectly, for example, your employment situation, your physical and mental health history, 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 and/or insurance requirements Your Information 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
- Health status and history, details of treatment and prognosis, medical reports (further details are provided below specifically with regard to the processing we may undertake in relation to this type of information)
- Any pre-existing mortgage and/or insurance products and the terms and conditions relating to these

The basis upon which our Firm will deal with Your Information

When we speak with you about your mortgage and/or insurance requirements we do so on the basis that a ***contract for the supply of services*** is in place between us. In order to perform that contract, and to arrange the products you require, we have the right to use Your Information for the purposes we set out below.

Alternatively, either in the course of initial discussions with you **or** when the contract between us has come to an end for whatever reason, we have the right to use Your Information 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, insurance providers and our Network 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 Information to enable us to meet ***any contractual responsibilities we may owe our Network, or for wider compliance with any legal or regulatory obligation to which we might be subject***. If this were to arise we would be processing Your Information in order to meet a legal, compliance or other regulatory obligation to which we are subject.

The basis upon which we will process certain parts of Your Information

Where you ask us to assist you with your insurance needs, in particular life insurance and insurance that may assist you in the event of an accident or illness, we will ask you information about your ethnic origin, your health and medical history (**Your Special Data)**. We will record and use Your Special Data in order to make enquiries of insurance providers in relation to insurance products that may meet your needs and to provide you with advice regarding the suitability of any product that may be available to you.

If you have parental responsibility for children under the age of 16 it is also very likely that we (and consequently our Network) will record information on our systems that relates to those children and potentially, to their Special Data.

The arrangement of certain types of insurance may involve disclosure by you to us of information relating to historic or current criminal convictions or offences (together "**Criminal Disclosures**"). This is relevant to insurance related activities such as underwriting, claims and fraud management.

Your Special Data and any Criminal Disclosures will be used by us in the same way as Your Information generally, as set out in this Customer Privacy Notice.

When we process your Special Data and any Criminal Disclosures we do so on the basis that it is in the substantial public interest to be able to provide vital insurance products and as permitted by UK data protection related laws and regulations from time to time. Information on Special Category Data and Criminal Disclosures must be capable of being exchanged freely between insurance intermediaries such as our Firm, and insurance providers, to enable customers to secure the important insurance protection that their needs require.

How do we collect Your Information?

We will collect and record Your Information from a variety of sources, but mainly directly from you. You will usually provide information during the course of our initial meetings or conversations with you to establish your circumstances and needs and preferences in relation to mortgages and insurance. You will provide information to us verbally and in writing, including email.

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 Information, such as software that is able to verify your identity on-line or to access your credit status and/or bank account entries, then you will be required to provide your consent for us or our nominated processor to access your information in this manner, and details of how such software operates will be provided to you prior to the activation of the service.

What happens to Your Information when it is disclosed to us?

In the course of handling Your Information we will:

- record and store Your Information in our paper files, mobile devices and on our computer systems (*websites, email, hard drives, cloud facilities*) and it will be accessed by employees and consultants within, or contractors engaged, by our Firm as necessary to provide our service to you and to perform any administration tasks associated with or incidental to that service
- submit Your Information to mortgage lenders and/or insurance product providers, both in paper form and on-line via mortgage lender/insurance provider systems, in order to progress any enquiry or application

made on your behalf and to deal with any additional questions or administrative issues that mortgage lenders and insurance providers may raise

- input Your Information, along with full details of the mortgage and/or insurance, discussed with you or which you have taken out, to the computer systems of our Network
- use Your Information for the purposes of responding to any queries you may have in relation to any mortgage product or insurance policy you may take out, or to inform you of any developments in relation to those products and/or polices of which we might become aware

Sharing and transferring Your Information

From time to time Your Information will be shared with or transferred to:

- our Network
- to mortgage lenders and insurance providers
- 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, such third parties will include but may not be limited to, product specialists (including those within our Network and other Appointed Representatives of the Network), estate agents, providers of legal services such as conveyancing, surveyors and valuers (in each case where we believe this to be required due to your particular circumstances).

In each case for the purposes set out in this customer privacy notice, i.e. to progress your mortgage and/or insurance enquiry and to provide you with our professional services.

Please note that this sharing of Your Information does not entitle such third parties to send you marketing or promotional messages: it is shared for the purpose of ensuring we can adequately fulfil our responsibilities to you, and as otherwise set out in this Customer Privacy Notice.

These parties may be located in the UK or elsewhere in the world where different privacy laws may apply which may not offer the same level of protection as UK law. We only make these arrangements or transfers where we are satisfied that adequate levels of protection are in place to protect any information held in that country and that the service provider acts at all times in compliance with applicable privacy laws.

The basis upon which our Network will deal with Your Information, Your Special Data and Criminal Disclosures

Our Network is authorised and regulated by the Financial Conduct Authority (**FCA**). Our Network is responsible for the quality of the advice that we provide to you in relation to your mortgage and/or insurance products, where those products are regulated by the FCA. In the course of doing so, our Network will also process Your Information generally, including Your Special Data and Criminal Disclosures.

In the course of handling Your Information and Your Special Data/Criminal Disclosures our Network will:

- record and store Your Information and Your Special Data/Criminal Disclosures on Network systems run on secure servers. Your Information and Your Special Data/Criminal Disclosures will be accessed by authorised employees and consultants within, or engaged, by the Network as necessary for the purposes of supervision, training, quality audits, customer surveys and complaint handling or otherwise to comply with any other legal or regulatory obligation the Network may have
- use, and where appropriate transmit, Your Information and Your Special Data/Criminal Disclosures to respond to any request from the FCA, the Financial Ombudsman Service, HMRC, the Office of the Information Commissioner or any other regulatory, law enforcement or governmental body
- need to access and process Your Information and Your Special Data/Criminal Disclosures to deal with enquiries received from mortgage lenders and insurance providers that relate to the service this Firm has

provided to you, including the payment of any commission or fees to us that may be linked to the product you have taken out.

Your Information and Your Special Data/Criminal Disclosures will be retained by our Network either electronically or in paper format for a minimum of six years and possibly for a longer period where this is required to enable the Network to fulfil its legal and regulatory obligations.

Please note that the above information is a summary of the Network Privacy Policy for customers. If, you wish to understand in more detail what the Network will do with Your Information and Special Data/Criminal Disclosures then please visit the Network Privacy Policy for customers located at https://www.primis.co.uk/index.php/terms-and-conditions/

Security and retention of Your Information

Your privacy is important to us and we will keep Your Information secure in accordance with our legal responsibilities. We will take reasonable steps to safeguard against Your Information being accessed unlawfully or maliciously by a third party, accidentally lost, destroyed or damaged.

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 sent to us.

Your Information will be retained by us either electronically or in paper format for a minimum of six years, or if longer than six years, the duration of this Firm's relationship with you.

Your rights in relation to Your Information

You can:

- request copies of Your Information that is under our control
- ask us to further explain how we use Your Information
- ask us to correct, delete or require us to restrict or stop using Your Information (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 Information 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)

How to make contact with our Firm in relation to the use of Your Information

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:

Caroline McCavanagh T/A Mortgage Health & Protect
7 Avonlea Crescent
Craigavon
BT64 1AU
caroline@cmcadvice.co.uk
Tel – 07938085507

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 Information, 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 Information or Your Special Data/Criminal Disclosures you may 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.