



## Privacy policy

Protecting your personal information is extremely important to us at R & E Finance. It's especially important our customers trust us to look after a huge amount of sensitive information.

The way we collect, use, store and share your information is equally important. Our customers expect us to manage their information privately and securely. If we don't, they will lose their trust in us.

This policy tells you how we collect and process your personal information. Please take a few minutes to read it and show it to anyone else connected to you or whose data you have shared with us. This policy may be subject to future changes.

Unfortunately, sending information via e-mail is not completely secure; anything you send is done at your own risk. Once received, we will secure your information in accordance with our security procedures and controls.

### What does this policy cover?

This privacy policy relates to customers who request financial advice, obtain quotes, or enter into agreements with one of our service providers.

### What is personal information?

When we talk about personal information, we mean information about an individual that can identify them, like their name, address, e-mail address, telephone number and financial details. It can relate to customers (including prospective customers), their appointed representatives, employees, shareholders, business contacts and suppliers. Any reference to "information" or "data" in this policy is a reference to personal information about a living individual.

### What information do we hold?

We may collect and process the following personal information about you:

TYPE OF DATA	DESCRIPTION
Contact	<ul style="list-style-type: none"><li>❖ Who you are</li><li>❖ Where you live (including previous addresses)</li><li>❖ How to contact you</li></ul>

	❖ Third party contacts (e.g. family members or friends)
Personal Details	❖ Age ❖ Gender ❖ Family details ❖ Visual images & personal appearance ❖ Financial details ❖ Lifestyle and social circumstances ❖ Health details ❖ Employment details
Transactional	❖ Bank and/or card details ❖ How you use our products
Contractual	❖ Your creditworthiness
Consent & preferences	❖ Ways you want us to send market material to you ❖ Information obtained from third parties acting on your behalf
Open data & public records	❖ Electoral register ❖ Land register ❖ Other information about you, that is openly available on the internet (including social media platforms)
Technical	❖ Details on devices and technology we use
Documentary data & national identifiers	❖ Details about you that are stored on documents like: ❖ Your Passport ❖ Drivers Licence ❖ Birth Certificate ❖ National Insurance number

#### Where do we get our information from?

- **Directly from you** - information you provide when you fill in forms or contact us by phone.
- **Information we collect about you or receive from other sources.** This could be information you provide to us electronically (through our website or email for example), or information from a third party.

We may also receive information if you have been dealing with a financial adviser, broker, or have been introduced to us by another company .

#### How do we use your information?

We use personal information that we hold about you:

- To carry out our responsibilities resulting from any agreements you've entered into with our service providers (e.g. to provide financial advice, product applications and mortgage affordability checks) and to provide you with the information, products and services that you've asked from us (e.g. quotes).
- To provide you with marketing information about services and products we offer at R & E Finance which may be of interest to you. If you have opted in to receive marketing from us, based on your marketing preferences we may deliver this information by post, telephone or e-mail. Please note that if you choose not to receive online marketing, you will not see personalised messages using your personal data. We will not sell your data to third parties for them to market to you.
- To comply with any applicable legal or regulatory requirements (including "*know your customer*" checks, or to comply with any applicable regulatory reporting or disclosure requirements).
- For any other purpose that we've agreed with you from time to time.

When you apply for a product or to receive a service from us, the application forms you fill out or the resulting contract may contain additional conditions relating to the way we use and process your personal information. These will apply in addition to the uses described in this document.

In some cases, we may use software or systems to make automated decisions based on the personal information we have, or collect from others. These may include:

#### •The prevention and detection of fraud and financial crime

To perform transaction monitoring, identity verification, money laundering and sanction checks, and to identify politically exposed individuals. We are required by law to perform these activities which may be achieved using solely automated means to make decisions about you or any individual related to your application. We may use these activities to decline the services you have requested or to stop providing existing services to you.

For mortgage purposes the factors may include your creditworthiness, assessment of mortgage affordability, property value and checks against records held by credit referencing and fraud prevention agencies.

#### • The provision of financial advice and recommendations

We may perform computer-based assessments with your personal and financial information in order to produce our financial advice recommendations. These activities are not solely based on automated processing and our qualified financial advisers will always validate the outcome to ensure that the decisions are suitable based on the information that you have provided.

#### Using your information in accordance with data protection laws

Data protection laws require us to meet certain conditions before we're allowed to use your personal information in the way we describe in this privacy policy. We take these responsibilities extremely seriously. To use your personal information, we'll rely on the following conditions, depending on the activities we're carrying out:

- **Providing our contracts & services to you:** We'll process your personal information to carry out our responsibilities resulting from any services you've entered into with us and to provide you with the information, products and services you've asked from us.
- **Complying with applicable laws:** We may process your personal information to comply with any legal obligation we're subject to.
- **Legitimate Interest:** To use your personal data for any other purpose described in this privacy policy, we'll rely on a condition known as "legitimate interests". It's in our legitimate interest to collect your personal data; as it provides us with the information that we need to provide our services to you more effectively.

This requires us to carry out an assessment of our interests in using your personal data against the interests you have as a citizen and the rights you have under data protection laws. The outcome of this assessment will determine whether we can use your personal data in the ways described in this privacy policy. We'll always act reasonably and give full and proper consideration to your interests in carrying out this assessment.

- **Consent:** We may provide you with marketing information about our services or products where you've provided your consent for us to do so. You may opt out of marketing at any time by e-mailing or by telephone

Please be aware that the personal information you provide to us, and which we collect about you,

is required for us to be able to provide our services to you and without it we may not be able to do so.

#### How long do we keep your information for?

We'll keep your personal information in accordance with the service provided. We'll determine the length of time we keep it for based on the minimum retention periods required by law or regulation.

We'll only keep your personal information after this period if there's a legitimate and provable business reason to do so.

#### Who do we share your personal information with?

We'll only disclose your information to:

- Other service providers
- If legally required to do so

#### Fraud prevention

The personal information R& E Finance collects from you may be shared with fraud prevention agencies, via service providers, who will use it to prevent fraud and money laundering and to verify your identity.

If false or inaccurate information is provided and fraud is identified, details will be passed to fraud prevention agencies. Law enforcement agencies may access and use this information. We may also share information about you with other organisations and public bodies, including the police and we may check and/or file your details with fraud prevention agencies and databases. If fraud is detected, you could be refused certain services, finance or employment.

Our service providers and other organisations may also access and use this information to prevent fraud and money laundering, for example, when:

- Checking details on applications for credit and credit related or other facilities.
- Managing credit and credit related accounts or facilities.
- Recovering debt.
- Checking details on proposals.
- Checking details of job applicants and employees.
- Checking sources of income and tax details.

#### Your Rights

You have rights under the data protection law that relate to the way we process your personal data.

More information on these rights can be found on the Information Commissioner's website. If you wish to exercise any of these rights, please get in touch with our team.

YOUR RIGHTS
1. The right to access the personal data that we hold about you.
2. The right to make us correct any inaccurate personal data we hold about you.
3. The right to make us erase any personal data we hold about you. This right will only apply where for example:

<ul style="list-style-type: none"> <li>• We no longer need to use the personal data to achieve the purpose we collected it for.</li> <li>• You withdraw your consent if we're using your personal data based on that consent.</li> <li>• Where you object to the way we use your data, and there is no overriding legitimate interest.</li> </ul>
<p>4. The right to restrict our processing of the personal data we hold about you. This right will only apply where for example:</p> <ul style="list-style-type: none"> <li>• You dispute the accuracy of the personal data we hold.</li> <li>• You would like your data erased, but we require to hold it in order to stop its processing.</li> <li>• You have the right to require us to erase the personal data but would prefer that our processing is restricted instead.</li> </ul> <p>Where we no longer need to use the personal data to achieve the purpose, we collected it for, but you need the data for legal claims.</p>
<p>5. The right to object to our processing of personal data we hold about you (including for the purposes of sending marketing materials to you).</p>
<p>6. The right to receive personal data, which you have provided to us, in a structured, commonly used and machine-readable format.</p>

## Contracts and Complaints

If you have any questions about this privacy policy or wish to exercise any of your rights, including changing your marketing preferences, please get in touch with our team.

If you have any concerns about the way we process your personal data, or are not happy with the way we've handled a request by you in relation to your rights, you also have the right to make a complaint to the Information Commissioner's Office. Their address is:

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

### Data Protection Officer

R & E Finance has appointed a Data Protection Officer:

Name: Richard Norton

Telephone: 01773 520608

Email address: [info@refinanceuk.com](mailto:info@refinanceuk.com)

Address: 8 Maple Drive, Mansfield, Nottinghamshire NG18 4UY