



Privacy Notice

ABOUT US

Mortgage Salad Limited t/a 55Plus is committed to protecting the privacy and confidentiality of all individuals and takes its responsibilities regarding the security of data very seriously. We abide by the rules of the General Data Protection Regulation (GDPR) upheld by the Information Commissioner Officer (ICO) and are authorised and regulated by the Financial Conduct Authority (FCA) to advise and arrange Lifetime Mortgages, Home Reversion Plans and Buy to Let. This includes processing any personal data lawfully, fairly and in a transparent manner.

WHAT INFORMATION DO WE COLLECT FROM YOU AND WHY?

We will only collect information from you so that we can advise and arrange Lifetime Mortgages, Home Reversion Plans and Buy to Let that may be suitable for you. In financial services we call this process fact-finding and it provides essential information for us to advise you and provide you with a suitable plan that meets your circumstances and requirements.

When obtaining information from you we will do this by phone, email or post and will confirm the accuracy of the data collated. It is important that all the data we hold on you is accurate so that we can advise and arrange suitable plans for you.

The types of information we will collect from you may include; contact details, occupation, income and expenditure, credit details, mortgage requirements, existing policies, solicitor's details, bank details. In addition, we may collect sensitive personal data such as medical conditions or criminal offence data where required to do so to arrange a plan on your behalf. On occasions further information may be required by a lender.

Where you provide your personal data on our website it will be taken as a positive action that you would like us to contact you for the purpose as set out on our website.

CONTACT DETAILS RECEIVED FROM A THIRD PARTY INTRODUCER

We may receive your contact details from a third party introducer to whom you have expressed an interest in the plan/service we have to offer. When this happens we will request from the introducer that they have obtained your consent and have made it clear to you that they will pass your details to a firm such as ours and that you are expecting us to contact you.

INFORMATION FROM OTHER SOURCES

We may obtain information from public records. This is to enable us to verify who you are or that facts you have supplied are accurate.

HOW WILL WE USE THIS INFORMATION?

We will only use your data in ways you would reasonably expect us to. Below we summarise how we will use your data.

We will use the information you provide to us to research the market on your behalf to find a suitable lifetime mortgage or home reversion plan that meets your circumstances and needs. Once we have carried out research we

will provide you with a personalised illustration detailing the plan information. Whilst you consider the illustration we will remain in touch to answer any questions you may have.

If you are happy to proceed we will then use your data to complete an application form which will then be forwarded to the relevant Lender. We will then liaise with them on your behalf until the plan has been arranged.

We will then contact you periodically so that we can continue to ensure that the lifetime mortgage or home reversion plan you have in place remains suitable. Where your circumstances or personal information have changed we will update our records and notify the Lender to do the same.

We will also use your data to assist with handling a complaint if you are not happy with the service you have received.

As part of our service we like to keep our customers up to date with new plans or offers that are available and may be of interest. Therefore, we may contact you from time to time through email marketing, phone, text or other types of marketing material. If you wish to opt out of this at any point please let us know.

In the interest to improve our services, telephone calls may be monitored and/or recorded for training purposes and to assist us handle a complaint. Where we record the call you will be informed of this.

THE LAWFUL BASIS ON WHICH WE USE THIS INFORMATION

How we use your information (detailed above) we will do so using the lawful basis legitimate interests. We have decided upon this basis as it allows us to meet with the ICO and FCA rules and is the most suitable lawful basis for processing data with a view to arranging a plan.

WHO WILL IT BE SHARED WITH?

As stated above, if you wish to proceed to take out a lifetime mortgage or home reversion plan then we will pass your details on to the Lender the plan will be arranged with. The information we pass on will be detailed within the application we complete on your behalf. We may also liaise with your Solicitor where relevant to arrange a plan on your behalf.

Where required we may forward your details onto regulatory authorities or fraud agencies where we have a legal obligation to do so to comply with our regulatory requirements or where fraud is suspected. We may do this under the lawful basis legal obligation.

WHAT WILL WE DO TO ENSURE THE SECURITY OF PERSONAL INFORMATION?

We will not share any of the information you provide to third parties for marketing purposes or store any of your information outside of the European Economic Area. The information you provide will be held securely by us regardless of whether the information is in electronic or physical format. We use leading technologies and security measures to safeguard your information and keep strict security standards to prevent any unauthorised access to it.

HOW LONG WILL WE RETAIN YOUR DATA?

Any personal data you provide to us during an enquiry where you have not specified that you do not want to be contacted in future will be retained and processed so we can keep you up to date with our services and market developments. If you tell us you do not wish to be contacted (during the enquiry or later) we will apply this immediately. Where we have arranged equity release on your behalf we will keep your file including your personal data and any call recording on record indefinitely. This retention period also applies to the personal data of third parties acting on behalf of a customer, eligible complainants and beneficiaries and attorneys. If you have not transacted business with us, your personal data will be deleted from our systems within 2 years.

WHAT ARE YOUR RIGHTS?

You have the right to:

- ✓ Be informed about how we use, share and store your personal information;
- ✓ Request access to the personal data we hold on you (also known as a Subject Access Request (SAR)). Where a SAR is requested we will respond promptly and within one month from the date we receive the request;
- ✓ Request your personal data is amended if inaccurate or incomplete;

- ✓ Request your personal data is erased where there is no compelling reason for its continued processing and we don't have a legitimate interest to retain it;
- ✓ Request that the processing of your data is restricted;
- ✓ The right to object to your personal data being processed;
- ✓ Rights in relation to automated decision making and profiling.

Where the processing of your data is based on your consent, you have the right to withdraw this consent at anytime by contacting us by phone or email. We do not use automated decision making or profiling systems.

MARKETING

Where we need your consent we will ask for this separately. We do not use pre-ticked boxes or make assumptions that you have given your consent. Your consent must be freely given by positively opting in or making a clear affirmative action that you are giving your consent. We will do our very best to ensure you know exactly what you are consenting to and remind you that you may withdraw your consent at anytime by contacting us by email or phone. Where consent is obtained a record of this will be made confirming what you have consented to, the time and date and how consent was obtained.

Clients: Our clients are important to us however we appreciate that on occasions you may wish to look elsewhere. If you do, we would like to stay in touch and therefore will ask for your consent to do so.

Potential Clients: Where you have expressed an interest in a plan and have decided not to proceed we would like to keep in touch therefore will ask for your consent to do so in case a plan may be of interest to you at a later date.

Non-Clients: We will only send you information about regulated plans or services if we have obtained your consent to do so.

RIGHT TO COMPLAIN

We hope that the service you receive from us is to the high standard you would expect. If at any point you are unhappy with the way we have used your data then please notify Jan Johnson by either email, post or phone below. If you remain concerned about the way we collect or use your personal data you can raise your concern with the Information Commissions Office (ICO) on 0303 123 1113. For further details you may visit the ICO website www.ico.org.uk

We will tend to disclose the complainant's identity to whoever the complaint is about, however if you expressly wish your identity to remain anonymous we will try to respect that. We will keep your complaint on record for two years once closed or six years if it also falls under FCA rules.

CHANGES TO THE INFORMATION

We regularly review and, where necessary update our Privacy Notice. If we plan to use personal data for a new purpose our Privacy Notice will be updated and you will be notified.

HOW TO CONTACT US

Please contact us at:

Jan Johnson
55Plus
12 Trinity Close, Tunbridge Wells, Kent, TN2 3QP

Tel: 01892 458780
Email: info@55plus.co.uk
Website: www.55plus.co.uk