

**Why should you 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 Personal Data). This document is important as it allows us to explain to you what we will need to do with Your Personal Data, and the various rights you have in relation to Your Personal Data.

**What do we mean by “Your Personal Data”?**

Your Personal Data means any information that describes or relates to your personal circumstances. Your Personal Data may identify you directly, for example your name, address, date of birth, national insurance number. Your Personal Data 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 Mortgage & Insurance requirements Your Personal Data may include:

- Title, name, 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 & Insurance products and the terms and conditions relating to these.

## Your Personal Data

### ***The basis upon which our firm will deal with Your Personal Data***

When we speak with you about your mortgage or insurance requirements, we do so on the basis that both parties are entering a contract for the supply of services.

In order to perform that contract, and to arrange the products you require, we have the right to use Your Personal Data for the purposes detailed 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 Personal Data 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 Compliance Service Provider 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 Personal Data for contractual responsibilities we may owe our regulator, The Financial Conduct Authority, or for wider compliance with any legal or regulatory obligation to which we might be subject. In such circumstances, we would be processing Your Personal Data 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 Personal Data**

Where you ask us to assist you with for example your insurance, 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 13, it is also very likely that we 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.

We will use Special Data and any Criminal Disclosures in the same way as Your Personal Data generally, as set out in this Privacy Notice.

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.

The basis upon which we will process certain parts of 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 13, it is also very likely that we 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.

We will use Special Data and any Criminal Disclosures in the same way as Your Personal Data generally, as set out in this Privacy Notice.

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 Personal Data?**

We will collect and record Your Personal Data 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 your Mortgage & Insurance needs. 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 Personal Data, for example software that is able to verify your credit status, we will only do so if we have consent from you, for us, or our nominated processor to access your information in this manner. With regards to electronic ID checks we would not require your consent but will inform you of how such software operates and the purpose for which it is used.

### **What happens to Your Personal Data when it is disclosed to us?**

#### **In the course of handling Your Personal Data, we will:**

- Record and store Your Personal Data in our paper files, mobile devices and on our computer systems (websites, email, hard drives, and cloud facilities). This information can only be accessed by employees and consultants within our firm and only when it is necessary to provide our service to you and to perform any administration tasks associated with or incidental to that service.
- Submit Your Personal Data to Product Providers/Mortgage Lenders/Commercial Lenders and/or Insurance Product providers) both in paper form and on-line via a secure system. The provision of this information to a third party is essential in allowing us to progress any enquiry or application made on your behalf and to deal with any additional questions or administrative issues that lenders and providers may raise.
- Use Your Personal Data for the purposes of responding to any queries you may have in relation to any Mortgage or Insurance you may take out, or to inform you of any developments in relation to those products and/or policies of which we might become aware.

## Sharing Your Personal Data

### From time to time Your Personal Data will be shared with:

- Mortgage lenders / Finance lenders / Insurance providers/Intermediary Packagers
- 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. These third parties will include but may not be limited to, our compliance advisers, product specialists, estate agents, providers of legal services such as estate planners, conveyancing, surveyors and valuers (in each case where we believe this to be required due to your particular circumstances).

In each case, Your Personal Data will only be shared for the purposes set out in this Customer Privacy Notice, i.e. to progress your Mortgage or Insurance enquiry and to provide you with our professional services.

*\*Please note that this sharing of Your Personal Data does not entitle such third parties to send you marketing or promotional messages, it is shared to ensure we can adequately fulfil our responsibilities to you, and as otherwise set out in this Customer Privacy Notice.*

We do not envisage that the performance by us of our service will involve Your Personal Data being transferred outside of the European Economic Area.

## Security and retention of Your Personal Data

Your privacy is important to us and we will keep Your Personal Data secure in accordance with our legal responsibilities. We will take reasonable steps to safeguard Your Personal Data against it being accessed unlawfully or maliciously by a third party.

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 being sent to us.

Your Personal Data will be retained by us either electronically or in paper form for a minimum period of 6 years following the advice/service you receive from us, although your data could be held for a longer period where this may be needed to meet the requirements of our regulatory bodies.

**Your rights in relation to Your Personal Data**

You can:

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

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:

**Andrew Foligno – Director & DPO**

Foligno & Co, Suite 7, Riverside House, Normandy Road, Swansea, SA1 2JA

Tel: 01792 687237 | Email: support@folignoandco-mortgage.co.uk

If we feel we have a legal right not to deal with your request, or to action it in a 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 Personal Data, so that we may investigate and fulfill our own regulatory obligations.

If you have any concerns or complaints as to how we have handled Your Personal Data 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*

**Website Use of Data Extended*****Who we are (WEBSITE):***

We are Foligno & Co, Foligno & Co is a trading name of Phillips & Foligno Associates Ltd. Our website address is: <https://folignoandco-mortgage.co.uk>

'We' relates to this website and all firm members/staff who control it. We can't/don't accept responsibility for any partners you may come in to contact with. Any personal data and transactional information is relation to this website only.

**Comments**

When visitors leave comments on the site we collect the data shown in the comments form, and also the visitor's IP address and browser user agent string to help spam detection.

An anonymized string created from your email address (also called a hash) may be provided to the Gravatar service to see if you are using it. The Gravatar service privacy policy is available here: <https://automattic.com/privacy/>. After approval of your comment, your profile picture is visible to the public in the context of your comment.

**Media**

If you upload images to the website, you should avoid uploading images with embedded location data (EXIF GPS) included. Visitors to the website can download and extract any location data from images on the website.

**Cookies**

If you leave a comment on our site you may opt-in to saving your name, email address and website in cookies. These are for your convenience so that you do not have to fill in your details again when you leave another comment. These cookies will last for one year. If you visit our login page, we will set a temporary cookie to determine if your browser accepts cookies. This cookie contains no personal data and is discarded when you close your browser.

When you log in, we will also set up several cookies to save your login information and your screen display choices. Login cookies last for two days, and screen options cookies last for a year. If you select "Remember Me", your login will persist for two weeks. If you log out of your account, the login cookies will be removed.

If you edit or publish an article, an additional cookie will be saved in your browser. This cookie includes no personal data and simply indicates the post ID of the article you just edited. It expires after 1 day.

**Embedded content from other websites**

Articles on this site may include embedded content (e.g. videos, images, articles, etc.). Embedded content from other websites behaves in the exact same way as if the visitor has visited the other website. These websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content, including tracking your interaction with the embedded content if you have an account and are logged in to that website.

**Who we share your data with**

In addition to data privacy disclosures in Part 1 of the Privacy Policy, there are also other data sharing policies. If you request a password reset, your IP address will be included in the reset email.

**How long we retain your data**

In addition to data retention in part 1 of the privacy policy, there are also some other data considerations:

If you leave a comment, the comment and its metadata are retained indefinitely. This is so we can recognize and approve any follow-up comments automatically instead of holding them in a moderation queue.

For users that register on our website (if any), we also store the personal information they provide in their user profile. All users can see, edit, or delete their personal information at any time (except they cannot change their username). Website administrators can also see and edit that information.

**What rights you have over your data**

If you have an account on this site, or have left comments, you can request to receive an exported file of the personal data we hold about you, including any data you have provided to us. You can also request that we erase any personal data we hold about you. This does not include any data we are obliged to keep for administrative, legal, or security purposes as stated in part 1.

**Where your data is sent**

Visitor comments may be checked through an automated spam detection service.

**Data Subject Consent Form**

I hereby grant Foligno & Co permission to process my personal data for the purpose stated in the Customer Privacy Notice.

**FILL IN YOUR DETAILS AND SIGN TO CONSENT**

**Applicant 1:**

**Full Name:** \_\_\_\_\_ **Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Yes, I agree.**

**Applicant 2:**

**Full Name:** \_\_\_\_\_ **Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Yes, I agree.**



**Applicant 1**

**Marketing Consent:**

I, hereby grant Foligno & Co permission to process my personal data for the purpose of marketing. By providing your consent, you agree that you have given your express permission for us to market you regarding products and services that we think may be of interest to you and by any means of communication that is suitable at the time.

**IMPORTANT NOTES: Marketing by our firm**

If you do not indicate your agreement for us to make contact with you, we may be unable to provide you with details of products and/or services that may suit your needs and circumstances. We would like to maintain a record of your express consent to contact you by post, telephone, SMS, email and instant messaging for marketing our products or services we may think may be of interest to you. Please indicate your consent to us contacting you by any of specified below:

**NAME, SIGN AND SELECT PREFERENCES**

**Full Name:** \_\_\_\_\_ **Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Yes, I agree.**

**I grant permission to process my data by at least one of the following:**

- |                                       |                                      |   |
|---------------------------------------|--------------------------------------|---|
| <input type="checkbox"/> <b>Phone</b> | <input type="checkbox"/> <b>SMS</b>  | <input type="checkbox"/> <b>Instant Messaging, i.e. WhatsApp or Similar</b> |
| <input type="checkbox"/> <b>Email</b> | <input type="checkbox"/> <b>Post</b> | <input type="checkbox"/> <b>Other</b>                                       |

**If other,  
specify other  
means of  
contact:**

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**NAME, SIGN AND SELECT PREFERENCES**

**Full Name:** \_\_\_\_\_ **Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Yes, I agree.**

**I grant permission to process my data by at least one of the following:**

- |                                       |                                      |   |
|---------------------------------------|--------------------------------------|---|
| <input type="checkbox"/> <b>Phone</b> | <input type="checkbox"/> <b>SMS</b>  | <input type="checkbox"/> <b>Instant Messaging, i.e. WhatsApp or Similar</b> |
| <input type="checkbox"/> <b>Email</b> | <input type="checkbox"/> <b>Post</b> | <input type="checkbox"/> <b>Other</b>                                       |

**If other,  
specify other  
means of  
contact:**