Privacy Policy

Mortgage Master

Who are Mortgage Master?

Mortgage Master is a trading style of Foces Finance, a limited company registered in England and Wales (Registration number: 04150083). We are regulated by Finance Planning Group Limited, which is authorised and regulated by the Financial Conduct Authority.

4 Station Road
Tidworth,
Wiltshire
SP9 7NN.

You can contact us at
03301 000 025
info@mortgagemaster.co.uk
mortgagemaster.co.uk/

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 your health and family history. We would like to explain to you what we will need to do with your personal information, and the various rights you have in relation to your personal information.

What 'legal basis' will you process my personal information?

Before we go any further, when we say process we mean look after and store. The law on data protection sets out a number of different reasons for which a company may collect and process personal information.

Contractual
We process your personal information in order to provide you with Mortgage and Protection Advice. In this case, the performance of a contract is simple, you ask us for advice on your mortgage and we provide it. We would be unable to provide you with this advice or arrange your mortgage without this information.

Legitimate interest
We will process your personal information under this condition where our interest in using it is not outweighed by your privacy rights or interests. This means that we can use your personal information only in ways you would reasonably expect and which have a minimal impact on your privacy, or where there is a compelling justification for the processing.

When it comes to staying in touch, we rely on legitimate interests because we only contact existing customers or people who have contacted us directly who are expecting us to do so. Each communication provides an easy to use opt-out.

Legal compliance
We may need to process your data in order to fulfil our legal obligations as a Financial Conduct Authority regulated business. For example we may need to verify your identity and comply with anti-money laundering legislation, and co-operate with law enforcement, legal proceedings or regulatory authorities.

What information do you collect?
There are a number of catergories of data including Identity Data, Contact Data, Financial Data, Special Category Data (specifically medical history) and Profile and Usage Data.

Mortgage Customers
This involves sourcing the market to find the mortgage that best suits your circumstances. We do this by asking you about your identity and contact details; your product preferences; your property and tenancy history and types and number of occupants and their relationship to you; your lifestyle; nationality and residence status; employment, income and expenditure and other financial circumstances. How you answer these questions will determine what other questions we ask you, because different lenders serve different parts of the market and have different eligibility criteria. We will always explain the process to you and answer any questions you may have about why certain types of information may be needed.
When you apply for a mortgage through us we will collect your direct debit details to pass on to your lender. If the products you select involve a cost, such as a valuation fee, we will ask for your payment information.Mortgage providers are data controllers in their own right and have their own privacy notices. However, because lenders may automatically profile your information against their lending criteria and against credit reference agencies as soon as your information is forwarded to them this may affect your credit score. We will always bring this to your attention as part of the process so that you are forewarned.

Insurance Customers
We routinely offer our customers a range of insurance and protection solutions. Where customers express an interest in protection, we will also collect information about health, as this maybe necessary for the insurers to determine level of cover and premiums.

How will you use my personal information?
As your Adviser, we use your personal information to discuss your personal circumstances with mortgage and protection providers. In order to determine the most appropriate product for your needs. A lender may then undertake credit enquiries upon receipt of your mortgage application. There may be instances where your identity and address is also checked using electronic verification providers.

Who do you share my personal information with?
We disclose personal information to third parties such as lenders and insurers, but only to a level is necessary to conclude the mortgage and/or protection contracts and the ongoing servicing of these contracts. A list of the type of firms this might include is:

- A lender, to process your mortgage application
- A solicitor or conveyancer, to help process your mortgage application
- An estate agent or home builder, again to provide updates to help process your mortgage application
- An insurer, to process your protection application
- A packager, to help process your mortgage application
- A secured loan master broker, if it is felt that a second charge mortgage is more appropriate for your needs
- A surveyor, in particular FP Surveying Services, to make contact with you only to offer you an opportunity to purchase a discounted Homebuyers Survey Report, if you are purchasing a property.
- An independent review company, Feefo, to give you the opportunity to express your satisfaction of our service.
- Also, under limited circumstances, your personal information may be disclosed to third parties as permitted by, or to comply with, applicable laws and regulations. For instance, to meet our obligations to the Financial Conduct Authority and when responding to subject access requests, proceedings of a court of law or similar legal process, to protect against fraud, and to otherwise cooperate with law enforcement or regulatory authorities.

The personal information you provide will not be passed to any third-party organisation for marketing purposes.

How do you collect my personal information?
Personal data is collected by us using the following methods:

- Direct interactions with an adviser in person, by post, phone, email or otherwise when sourcing and applying for mortgage or protection products.
- Automated technologies or interactions with our website or CRM system ACRE, by using the web enquiry form or the quick quote application, QuickStart™.

Third parties or publicly available sources, such as:
- Estate agents with whom you may be interacting, but only with your consent.
- New home builders, as a legitimate interest of the builder in order to assess affordability for the property.

How we use personal data to ask for feedback via email
We share your name, email address, and details of the product/service with Feefo. Feefo will then send you an email on our behalf, inviting you to provide feedback. Our legal basis for this data processing is our legitimate interest in requesting feedback to improve our products and services.

How do you keep your personal information secure?
We understand how important it is to keep your personal information secure. We store your personal information on our chosen CRM system (ACRE). The Acre Security Framework is based upon ISO27001, and sits at the centre of both the Acre SDLC (Software Development Life Cycle) and Acre's operations model. The security of the data stored in the Acre platform is of utmost importance to Acre, both in terms of preventing inappropriate access, as well as preventing against loss of data.

The Acre platform has been built from the ground up with security, privacy, resilience, and scalability in mind. It has been built by a team with experience deploying mission critical and highly sensitive systems for the FCA, top tier international banks, and Credit Reference Agencies. This team takes security seriously and actively works to mitigate risks to data security.

We also limit access to your personal data to only those Mortgage Master staff, Finance Planning Group staff, appointed representatives, advisers, business partners and suppliers who have a business need to know.

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

How long will you store my information for?

We only retain your personal data for as long as necessary. The list below outlines how long data is retained, and depends on the reason the personal data is used for:

Purpose of processing	Period
Full application, where product goes into force	Contract term plus six years
Failed applications, where the product does not proceed	2 years
Enquiries from third parties i.e. an estate agent	2 years
Affordability assessments i.e. property offer validation	2 years

What are my rights?

Here is an overview of your different rights:

Your right to access
Access to the personal data we hold about you, free of charge in most cases. The correction of your personal data when incorrect, out of date, or incomplete.

Your right to withdraw consent
Whenever you have given us your consent to use your personal data, you have the right to change your mind at any time and withdraw that consent. We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data.

Right to object
You will have the right to object to how we intend to use your information based on your individual circumstances. If you exercise this right, we may not be able to perform all of our services.

You have an absolute right to object to receiving communications where we do not have a legitimate interest in doing so. For example; you can ask us to stop sending you a quarterly newsletter but we may have a legitimate interest in contacting you during the application process.

Right to complain
You have a right of complaint to the Information Commissioner (The U.K data protection regulatory authority) if you consider any aspect of The Finance Planning Group's use of your personal information infringes the law.

Right to data portability
You have the right in some circumstances to have the data you have provided to us sent to you or provided to another person or business in an electronic machine readable format. Where this applies we will download the information and send it as a CSV file.

Right to erasure
You have a right to have some or all of the information we hold about you erased in some circumstances. This is known as the right to be forgotten.

Right of correction
You have the right to have inaccurate information corrected and incomplete information completed. If the information we need to deliver our services to you changes, please tell us about this as soon as possible.

Who can I speak to about my personal information?

If you have any questions or concerns about the way in which we are processing your personal information or would like to exercise one of your earlier mentioned rights, in the first instance please contact our Privacy Officer.

Finance Planning Group, Hurstwood Grange, Hurstwood Lane, Haywards Heath, West Sussex, RH17 7QX.

By Phone
01444 449 200

By email
privacyofficer@financeplanning.co.uk

If you would like to update your privacy settings or exercise any of your above rights, you may do so online at financeplanning.co.uk/privacy-settings.

What about when things go wrong?

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. You can contact them by calling **0303 123 1113**, or go online to **ico.org.uk/concerns**.

Will this policy change?

Yes, we may change this Privacy Policy from time to time, for example if the law changes. Any changes will be immediately posted on financeplanning.co.uk and you will be deemed to have accepted the terms of the Privacy Policy on your first use of our website following the alterations. We recommend that you check this page regularly to keep up-to-date.

This Privacy Policy was last updated October 2024.