# **PRIVACY POLICY**



#### Introduction

This is the Privacy Statement of Direct 2 Lender Private Finance Ltd as it relates to this Site. We are not responsible for the content or privacy practices of other websites. Any external links to other websites are clearly identified as such.

Direct 2 Lender Private Finance Ltd respects the rights of users of our Site and is committed to protecting your privacy in accordance with current Data Protection legislation at all times. We will not collect any personal information (also referred to as personal data) about you on this Site without your permission or otherwise in accordance with current Data Protection legislation.

This Privacy Notice explains how we will handle any personal information that you provide to us or that we collect from you in connection with your use of the Site and the rights you have under Data Protection legislation. Direct 2 Lender Private Finance Ltd is the data controller of the personal information collected via this Site.

This Privacy Notice should be read together with our Cookie Policy.

You are not required to provide us with any personal information (or personal data) in order to use our Site. However, where you choose to give us personal data, via online feedback forms or e-mail, then we will treat your personal information in accordance with current Data Protection legislation. The type of personal information provided by this means includes:

- · Your name, address, email address, job title and other contact details
- · Information related to an enquiry requesting financial advice
- Details of the mortgage services you are interested in (to help us tailor our marketing communications)
- Records of your correspondence with us, if you have contacted us and information collected automatically using cookies and other tracking technologies, such as details of the web pages you have visited on our Site and the content that you access.

We may also collect information when you voluntarily complete client surveys or provide feedback to us.

By simply visiting our Site, you do not disclose, nor do we collect, personal data about you. The information collected about your visit is limited to technical data such as:



- The Internet address (or IP address) of the device you used to access this Site
- · Whether you reached the Site using a search engine or if you clicked a link on another website
- The type of web browser you used; the type of device you used to access the Internet. We use this data for administrative and statistical purposes as well as to help us improve our Site. This technical data does not provide us with the personal data of visitors to our Site.

Most websites use cookies in order to improve the visitor experience by enabling that website to 'remember' you, either for the duration of your visit (using a 'session cookie') or for repeat visits (using a 'persistent cookie'). Cookies may be set by the website you are visiting ('first party cookies') or they may be set by other websites who run content on the page you are viewing ('third party cookies').

This site uses cookies and, by continuing to use this Site we assume you agree to their use.

## Links to third party websites

The Site may contain links to third party websites, including options to share content you have read on third party websites, for example, on LinkedIn or Twitter. If you follow a link to any third party website, please be aware that these websites have their own privacy policies and that we do not accept any responsibility or liability for their handling of your personal information.

## **Giving us your Personal Information**

Please note that where you provide us with your personal information (e.g. name, e-mail address, work address, phone and/or other contact information), through a facility provided on this Site or directly to us by e-mail, you consent to us:

- a) Processing of your personal data is necessary for the performance of our contract for services with you and in meeting our obligations to preventing money laundering or terrorist financing. This is the lawful basis on which we intend to rely for the processing of your data, please see the reference to special categories of data below. Our policy is to gather and process only that personal data which is necessary for us to conduct our services appropriately with you and to prevent money laundering or terrorist financing.
- b) Processing and administering your personal data to perform all necessary actions to give effect to your request or instruction; and
- c) Retaining a record of incoming and outgoing communications (eg e-mail).



Information in the e-mail we receive and send will not be disclosed to any third party without the permission of the sender unless otherwise in accordance with the Data Protection legislation.

There are certain categories of personal data that are sensitive by nature. The categories include data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership and data concerning health. Depending on the nature of the products and services that you engage us for we may need to obtain your sensitive personal data particularly in relation to health. Our policy is that should we require any special category of personal data we will only gather this with your explicit consent.

Please note that by using this Site you are giving us your consent to process your personal data as outlined in this Statement. Your consent is also provided to any successor or assignee of Direct 2 Lender Private Finance Ltd and/or any of its businesses. We inform all persons who submit their personal data to us of these conditions by this Privacy Statement.

#### Marketing

We may send you information on mortgage services that we offer. For more information please visit the Information Commissioner Officer's website: https://ico.org.uk/your-data-matters/does-an-organisation-need-my-consent/

If you would rather not receive this information or market commentary please contact enquiries@direct2lender.com.

Please note, if you are an existing customer and you opt out, Direct 2 Lender Private Finance Ltd will still contact you prior to the end of your mortgage this is to ensure your mortgage product remains suitable.

If you (whether an individual or business customer) wish to be removed from our direct marketing list and do not wish to receive any further information from us (opt-out) you can inform us of this by clicking on the link at the bottom of each e-mail communication you receive from us. Once this information is received we will immediately remove you from our direct marketing database. Alternatively, you can email us at enquiries@direct2lender.com and request to be removed.

We may send you marketing material relying upon the lawful ground of legitimate interest. For more information please visit the Information Commissioner Officer's website: https://ico.org.uk/your-data-matters/does-an-organisation-need-my-consent/



### **Security of Data**

Direct 2 Lender Private Finance Ltd takes seriously its security obligations in respect of your personal data under the Data Protection Acts in order to prevent unauthorised access to, or alteration or destruction of personal data in our possession.

#### Retention

During the course of our relationship with you we will retain personal data which is necessary to provide services to you. We will take all reasonable steps to keep your personal data up to date throughout our relationship. We are also subject to regulatory and legislative requirements to retain your data for specified minimum periods. We reserve the right to retain data for longer where we believe it's in our legitimate interests to do so. In any case, we will not keep your personal data for longer than seven years after our relationship with you has ended.

Please note that where you unsubscribe or opt out from a marketing communication, we need to keep a record of your email address to ensure we do not send you marketing emails in the future.

### **Right of Access**

Where you have provided us with your personal data you have a right to be given a copy of your personal data in accordance with current Data Protection legislation subject to certain exceptions. To request a copy of your personal data please contact enquiries@direct2lender.com

### **Right of Rectification or Erasure**

If we hold incorrect information about you which was originally submitted by you through this Site, you have the right to have the data amended. You also have the right to have any information you have sent to us via this Site erased. To request your right to rectification and/or erasure please send your request to enquiries@direct2lender.

This request must be accompanied by a description of the specific personal data you wish rectified.

If you request erasure of your personal data all your data will be erased subject to the following important notice:

• We are not required to rectify or erase your data where to do so would prevent you from meeting your contractual obligations to us or where we are required to process (including retaining) your personal data for a lawful purpose in accordance with Data



### **Protection legislation**

Direct 2 Lender Private Finance Ltd trusts that you appreciate that we respect and value your right to privacy and that our honesty and integrity shall mean that you will continue to trust us with your personal data, knowing that we will not use it for any inappropriate purpose.

What can you do if you are unhappy with how your personal data is processed? Please contact us if you have any questions about our privacy policy or information we hold about you by email at enquiries@direct2lender.com

You also have a right to lodge a complaint with the supervisory authority for data protection.

In the UK this is: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF 0303 123 1113 (local rate)

### **Updates to this Privacy Notice**

This Privacy Notice may be amended by us at any time. Please check this page periodically to inform yourself of any changes. It was last amended in November 2020.