Privacy Notice

Who we are

Paul Came trading as The Mortgage Plan is authorised and regulated by the Financial Conduct Authority under the firm reference number of 1056341.

Our ICO number is ZA600619

What data do we collect?

Our Company collects the following data:

• 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 and Insurance products and the terms and conditions relating to these

How do we collect your 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 Mortgages and Insurance. 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 this 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.

Special Category Data
In the course of your interactions with Paul Came trading as The Mortgage Plan you may share information that is classified as 'Special Category Data'. This could include data about:

- Race
- Ethnic origin
- Politics
- Religion
- Trade union membership
- Genetics
- Biometrics
- Health
- Sex life
- Sexual orientation

Where you do share information relating to any of these categories e.g., when you may share information about your health or a characteristic of vulnerability Paul Came trading as The Mortgage Plan will always seek explicit consent from you to store and process such information.

How will we use your data?

Our Company collects your data so that we can:

- Process your application and manage your request.
- Email you with special offers on other products and services we think you might like.
- To monitor the performance of our products and services to ensure consumer outcomes are being achieved

Purpose/Activity	Type(s) of data	Lawful basis for processing
To initially engage with you to discuss your requirements	• Identity • Contact	Consent Necessary for our legitimate interests
To source products, provide indicative quotes, and process & deliver your application for a mortgage or protection product	• Identity • Contact • Financial • Transaction • Marketing & Comms • Special Category	Performance of a contract with you To comply with a legal obligation Necessary for our legitimate interests (to recover debts due to us) Explicit Consent
To manage our relationship with you which will include: • Notifying you about changes to our terms or privacy policy • Customer reviews / surveys • Re-engagement when existing products nears expiry / review protection needs	• Identity • Contact • Profile & Usage • Marketing & Comms	Performance of a contract with you To comply with a legal obligation Necessary for our legitimate Interests (to re-engage with you to review your existing mortgage / protection needs, and to maintain and improve customer service standards)
To respond to case enquiries and input to & defend against complaints	• Identity • Contact • Profile & Usage • Transaction • Marketing & Comms • Special Category	To comply with a legal obligation Necessary for our legitimate interests (to ensure that complaints can be responded to accurately) Legal Claims & Judicial Acts
To perform an affordability check for a property on behalf of an Estate Agent or New Home Builder	• Identity • Contact • Financial • Profile & Usage	Necessary for our legitimate interests and of the New Home Builder / Estate Agent (to ensure that a property is affordable before proceeding with the purchase process)
To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	• Identity • Contact • Technical	To comply with a legal obligation Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	• Technical • Profile & Usage	Necessary for our legitimate interests (to analyse customer usage, update our website, to develop our business and to inform our marketing strategy)

Lawful Basis for Processing Data

If you agree, Our Company will share your data with our partner companies so that they may offer you their products and services.

Type of recipient	Reason
Lenders and protection product suppliers	To source and submit applications in order to conclude the contract for the mortgage / protection application and the ongoing servicing of these contracts.
External suppliers	Specialist IT system providers to facilitate the sourcing of products, to provide continuing advice, to inform you about relevant products and services, and to request feedback on customer service standards. It may also be necessary to share your personal information with non-affiliated companies who perform support services on our behalf including those that provide professional, legal or accounting advice to Paul Came trading as The Mortgage Plan.
Solicitors / Conveyancers	To update the firm of solicitors / conveyancers with whom you are interacting about the progress of your application and confirm your identity / proof of deposit.
Estate agents / new home builders	To update the firm of mortgage / protection advisers, estate agents and home builders with whom you are interacting about the results of affordability checks and progress of your application.
Licensed Credit Agencies	For the purposes of confirming your identity to comply with Anti Money Laundering requirements to perform a credit assessment to assess your eligibility; as part of an application request for a Lenders Decision In Principle; and to perform a credit assessment with your consent as part of a full application.
Regulators	Sharing of information may be necessary to fulfil our legal obligations as a regulated profession, for example with the Financial Conduct Authority, to verify your identity and comply with Anti Money Laundering legislation, and otherwise co-operate with law enforcement, legal proceedings or regulatory authorities.
Others	Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice

When Our Company processes your data, it may send your data to, and also use the resulting information from, credit reference agencies to prevent fraudulent purchases.

How do we store your data?

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

Purpose of processing	Retention
Successful mortgage / protection applications	For the full mortgage or protection policy term – six years from the date the application completes.
Withdrawn, stalled, incomplete and failed mortgage/ protection applications	2 years from the date the latest application was started, or 6 years from the application submitted date if application was submitted and subsequently rejected or from creation date if advice has been provided but not pursued
Affordability assessments for new build property	2 years from Decision In Principle if affordability check does not proceed to a full mortgage application
Enquiry data obtained from third parties (Estate Agents, websites) that do not result in an application for a mortgage / protection product	2 years from the date the lead was received from the Introducer

Marketing
Paul Came trading as The Mortgage Plan understands that with the introduction of the Consumer Duty, it is likely the level of communications issued by our business will increase. This will be necessary to support customers to understand the products and services offered and to provide support to customer throughout the lifecycle of the relationship.

You have the right at any time to stop Our Company from contacting you for marketing purposes or giving your data to other members of the Our Company Group.

What are your data protection rights?
Our Company would like to make sure you are fully aware of all of your data protection rights. Every user is entitled to the following:

The right to access – You have the right to request Our Company for copies of your personal data. We may charge you a small fee for this service.

The right to rectification – You have the right to request that Our Company correct any information you believe is inaccurate. You also have the right to request Our Company to complete the information you believe is incomplete.

The right to erasure – You have the right to request that Our Company erase your personal data, under certain conditions.

The right to restrict processing – You have the right to request that Our Company restrict the processing of your personal data, under certain conditions.

The right to object to processing – You have the right to object to Our Company's processing of your personal data, under certain conditions.

The right to data portability – You have the right to request that Our Company transfer the data that we have collected to another organization, or directly to you, under certain conditions.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us at our email:

Call us at: paul.came@themortgageplan.co.uk

Or write to us: 12 Woodstone Terrace, Houghton le Spring, DH4 6DP

Cookies

Paul Came trading as The Mortgage Plan may use cookies to track and test customer engagement and actions throughout the customer journey or customer communications. Paul Came trading as The Mortgage Plan understand that under the Privacy and Electronic Communications Regulation (PECR) opt-in consent is required when these types of cookies are used.

Cookies are text files placed on your computer to collect standard Internet log information and visitor behaviour information. When you visit our websites, we may collect information from you automatically through cookies or similar technology.

For further information, [visit www.allaboutcookies.org].