



68 Combe Park, Bath, Somerset BA1 3NE
Tel: 01225 319787. Email: admin@hallmarkifs.co.uk

Member company details: Michael Hoare T/A Hallmark Mortgages & Equity Release

PRIVACY STATEMENT

Introduction

Hallmark Mortgages & Equity Release respects your privacy and is committed to protecting your personal data. The Privacy Policy will inform you as to how we look after your personal data when we do business with you and tell you about your privacy rights and how the law protects you. By conducting business with Hallmark Mortgages & Equity Release you will be consenting and agreeing to these terms.

Purpose

This Privacy Policy aims to give you information on how we collect and process your personal data through our normal course of business, including any data which we collect from you in our normal financial planning exercises.

It is important that you read this Privacy Policy so that you are fully aware of how and why we use your data. This Privacy Policy supplements any other notices and is not intended to override them.

Data Controller

Hallmark Mortgages & Equity Release will act as the data controller and is responsible for this policy and any data you provide to the organisation. If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please use the contact us at 68 Combe Park, Bath, Somerset BA1 3NE, email: admin@hallmarkifs.co.uk.

You have the right to make a complaint at any time to the Information Commissioner's Office, the UK's supervisory authority for data protection issues.

Changes

We may update this Privacy Policy from time to time and you should check with us periodically to ensure that you have the latest version. You can request an up to date copy from us at any time by contacting us at 68 Combe Park, Bath, Somerset BA1 3NE, email: admin@hallmarkifs.co.uk. It is important that the personal data we hold about you is accurate and current. Please keep up informed if your personal data changes during your relationship with us.

Third Party Associations

We are registered under the Data Protection Act 1998. You acknowledge and understand that we keep personal and financial information with regard to your circumstances on file (electronic and/or paper based) as required to be able to advise you as to your financial planning needs. We confirm that this information will not be used or transferred by us to any other firm, company, entity or person with the

exception of Sanlam Partnerships Limited and the product provider without your consent or as may be required by law. We may also provide information to the FCA upon request for regulatory reasons.

The Data

Personal data, or personal information, means any information about a living individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We only obtain personal data which you, or those acting on your behalf, may submit to us during our meetings, discussions and correspondence.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- Title, names, 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 investments, mortgages, pensions and/or Insurance products and the terms and conditions relating to these
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We do not ask for any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

How is your personal data collected?

When you enter a business relationship with us we use different methods to collect data from and about you including through direct interactions. You may give us your personal data during a face to face meeting, over the telephone or by electronic means.

How we use your personal data

You will be informed of the way in which we will use your personal information before you provide it.

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data for the following lawful purposes, to:

- Perform the contract we are about to enter into or have entered into with you, for example to respond to a query or otherwise to manage our relationship with you.

- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests, for example to update our records, to prevent fraud, or to respond to a query.

Where we need to comply with a legal or regulatory obligation, for example to detect and prevent fraud or money laundering, to update your marketing communications preferences and correspond with you accordingly, or to verify your identity.

Marketing

You may receive marketing communications from us if you have specifically requested this from us or where we are otherwise legally entitled to do so, and, in each case, you have not opted out of receiving that marketing.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes explained above.

- Third parties such as Her Majesty's Revenue & Customs, our regulators, and law enforcement agencies based in the UK who may require reporting of processing activities in certain circumstances.
- We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.
- We will never sell your personal data to a third party.

Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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.

Where you have requested us to contact you we will communicate with you via email and/or telephone, depending on what you have specified. By doing so, you acknowledge that because of the nature of the internet the security of emails cannot be guaranteed.

Data retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances you can ask us to delete your data, see below for further information.

Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data:

- Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw

your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please use the contact details above. You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you as soon as practicable and thereafter keep you updated.