

## INTRODUCTION

This is the privacy notice or policy (notice) of PropertyPal Mortgages Limited (**we, us or our**).

We respect your privacy and are committed to protecting your personal data.

This privacy notice will inform you as to how we look after your personal data when you come to us for products or services, including advice on mortgage or protection products or services, use our will generation service, generally interact with us as one of our customers, or visit and use our website (regardless of where you visit it from) <https://www.propertypal.com/mortgages> (our **website**), as an interested party seeking to gather information, or otherwise.

It also informs you how we will look after your personal data when, and about your privacy rights and how the law protects you. It does not cover any website you have used to access our website or any website that you access from it.

It is important that you read this privacy notice so that you are fully aware of how and why we are using your data.

Please use the Glossary to understand the meaning of some of the terms used in this privacy notice.

## 1. WHO WE ARE

Under the UK General Data Protection Regulation or the EU General Data Protection Regulation (collectively **GDPR**) and other relevant data protection legislation, we act as both a data controller (i.e. where we make decisions) in relation to your personal data that we collect, as well as a data processor (i.e. process data broadly in accordance with your instructions).

**When we act as a Data Processor:** When as a customer or user you use our services to process personal data, we act as a data processor. Under these circumstances, the customer or user may act as a data controller or data processor itself, and we will act as either a processor or a sub-processor.

**When we act as a Data Controller:** By contrast, when we collect personal data and determine the purposes and means of processing that personal data – for example, when we store account information for account registration, administration, services access, or contact information as explained below – we act as a data controller.

If you have any questions about this privacy notice, including any requests to exercise any of your legal rights, please contact us using the details set out below.

### Contact Details

Our full details are:

**Full Name of Legal Entity:** PropertyPal Mortgages Limited, a company incorporated in Northern Ireland under company number NI632933

**Email Address:** [mortgages@propertypal.com](mailto:mortgages@propertypal.com)

**Postal Address:** Unit 2D Jennymount Business Park, North Derby Street, Belfast, BT15 3HN

**ICO Registration Number:** ZA136459 (this is the number under which we are registered with the ICO for the processing of personal data)

PropertyPal Mortgages Ltd is an Appointed Representative of PRIMIS Mortgage Network (**Primis Network**). PRIMIS Mortgage Network is a trading name of First Complete Ltd which is authorised and regulated by the Financial Conduct Authority for mortgages, protection insurance and general insurance products under reference number 435779.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data

protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

If you would like to make a complaint to the ICO, their contact details are:

**By phone:** 0303 123 1113

**Online:** <https://ico.org.uk/concerns>

## Changes to the Privacy Notice and your Duty to Inform us of Changes

This version two of this Policy was last updated on July 2021 and historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## Third-Party Links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## 2. THE DATA WE COLLECT ABOUT YOU

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

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as set out below.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us. Where you have registered to use our website you can update your details or delete your account at any time.

## DATA THAT YOU SUPPLY TO US

### GENERAL PERSONAL DATA

Depending on the nature of your interaction with us, and the products or services we provide to you, you may share personal information about you that you share with us through filling in online or offline forms, by email, through the post, on the telephone or by any other means.

- **Mortgage Data:** As outlined in the terms for our mortgage product advice services (the mortgage service) available here, we offer advice and assistance in securing mortgage products. The personal data we typically collect through the mortgage service is specified below:
- **Third Party Mortgage Data:** Personal data in relation to the following people where relevant to the mortgage services:
  - Names and dates of birth of dependents; and
  - Landlord contact details if renting a property
  - Tenant contact details for Buy to Let mortgages
- **Your Mortgage Data:** We will also collect the following personal data in relation to you as the prospective mortgage applicant:
  - ID information such as names, dates of birth, copies of proof of address or proof of ID documentation such as passports, driver's licence(s), national insurance cards, utility bills, details of your residency or nationality status, or similar information;
  - Relationship information including your marital status, details of your dependents;
  - Contact information such as email addresses, phone numbers and other contact information;
  - Residency information including your home addresses (including

- your previous addresses and time spent there);
- Employment or business information such as details of your occupation, salary, bonuses, sick pay entitlement, your employment status, copies of payslips, employment basis, employer name and contact details, details of your accounts, revenue generated;
- Financial data such as bank statements, mortgage statements, other loan statements, savings or investment statements, details of your property value or other income or deposit verification information;
- Details of your credit report including any court judgments or bankruptcy information; and
- Any other information which you provide when using the mortgage services.

Where you are availing of the mortgage services on behalf of yourself and anyone else you may provide us with this information in relation to the other person.

This personal data shall be known as the **Mortgage Data** in this policy.

- **Protection Data:** As outlined in disclosure document we provided above with respect to our mortgage services we also offer advice and assistance in securing protection products (i.e. life, critical illness or property insurance cover). We call provision of this advice the **protection services**. The personal data we typically collect through the protection service is specified below (we may also collect other forms of data that are not subject to this notice):

- **Third Party Protection Data:** Personal data in relation to the following people where relevant to the protection services:

- Health information such as your height, weight, alcohol consumption, whether or not you are a smoker, your exercise habits, details of your GP Practice; a list of your medical conditions, any life or illness cover you have in place;
- Medical history information in relation to immediate family members; and
- Names and dates of birth of dependents.

- **Your Protection Data:** We will also collect the following personal data in relation to you as the prospective applicant for a protection product:

- ID information such as names, dates of birth, copies of proof of address or proof of ID documentation such as passports, driver's licence(s), national insurance cards, utility bills, details of your residency or nationality status, or similar information;
- Relationship information including your marital status, details of your dependents;
- Health information such as your height, weight, alcohol consumption, whether or not you are a smoker, your exercise habits, details of your GP Practice; a list of your medical conditions, any life or illness cover you have in place;
- Contact information such as email addresses, phone numbers and other contact information;
- Residency information including your home addresses (including your previous addresses and time spent there), as well as details of your property (in the context of home insurance policies);
- Employment or business information such as details of your occupation, salary, bonuses, sick pay entitlement, your employment status, copies of payslips, employment basis, employer name and contact details, details of your accounts, revenue generated; and
- Any other information which you provide when using the protection services.

This personal data shall be known as the **Protection Data** in this policy.

- **Other Data:** If you visit our website, you may also provide information about yourself, including your full name, home address, business address, personal and/or business email address and telephone and/or mobile phone number and other contact details, or comments provided through our contact form.

You may also enter financial details into the calculators or forms included on our website, including where you contact us to enquire about a mortgage product, or use one of our automatic tools, including your salary details, mortgage details, such as the value or deposit, term remaining, loan to value, proposed mortgage term, current lender, nature of mortgage (first time buyer etc.) or details of other offers.

If you are logged into the website at the time, you may be personally identifiable from that data.

- **Prospective Employment Data:** If you apply for a role with our organisation, other personal data shared is likely to include your employment history, proof of identity, qualification checks, health information, or whatever other information you volunteer to us.

- **Marketing Data:** You may also communicate your preferences in receiving marketing from us and our third parties and your communication preferences (including details you provide when you opt-in to receive marketing communications from us).

If you provide verbal personal information that you give us consent to use you will have such consent confirmed back to you in writing.

Where you are sharing personal data that does not directly relate to you (e.g. your representatives that legally act on your behalf), you must ensure you have the consent to do so and have shared this notice with that person/those people.

## PERSONAL DATA THAT WE COLLECT

- **Telephone Recordings:** Telephone conversations may be recorded to improve training and to ensure a high level of consistent customer service.
- **CCTV Footage** – We may use CCTV cameras on our premises and may record footage of you where you attend our premises in person, and use such footage as required in our legitimate interests, including to ensure the safety and well-being of our staff.
- **Technical Data** - We may use the following technical services to gather technical data in the ways specified in our cookies policy, which we discuss below and which is available here: <https://www.propertypal.com/cookie-policy>. You are not personally identifiable from any of the above data.

## INFORMATION WE RECEIVE FROM THIRD-PARTIES

- **Business Partners** – where we have formal relationships with business partners who may introduce new customers or sales opportunities to us, personal data would include personal contact details, information on the areas of interest and data required to fulfil a request, product or service. This would include referrals from estate agents, personal referrals, and referrals from our affiliated company, PropertyPal.com Limited.
- **Social Media** – where you have responded to a promotional item or offer from us through social media facilities such as Facebook, LinkedIn etc., we can receive profile information about you which can include your name, address, telephone number(s) and/or your business contact details. This information would be used to respond to your interest, to fulfil a request from you and/or to send you future information and offers, where you have given clear consent to do so.
- **Publicly Available Information** – we may collect personal information about you from publicly available sources. This can include your name, address and other publicly available information. As far as possible, we ensure that where any third-parties are involved in supplying such information, that they are compliant to do so. This may include credit reference agencies such as Experian, public registers such as the Companies House registry or the Electoral Register, or other electronic identification verification portals such as Smartsearch (<http://www.smartsearchuk.com/>), who may undertake ID checks on applicants where applying for products or services from a company that requires or accepts these forms of ID checks.

- **Your GP** - In connection with the Protection Services we will collect a report from your general practitioner of your health conditions. We do not hold a tangible copy of the report, and it will be shared directly with the provider of any protection product you elect.

We may also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any **Special Categories of Personal Data** about you (including details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership and genetic and biometric data), other than health or medical information where required to provide the protection services or mortgage services.

Any such medical data or health information will be carefully safeguarded and only shared with, selected and screened third party providers of protection products where required in order to allow such providers to quote for or provide such products or services which you have requested to you. A full list of those providers is set out in the table in Section 4 below.

We do not collect any information about criminal convictions and offences.

#### **If you Fail to Provide Personal Data**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

#### **Cookies**

A Cookie is a small text file that is added to your device's hard drive by a web server within our domain. Cookies cannot be used to run software programs or add a virus to your device. They are unique to you and avoid you having to input the same information and preferences each time you visit our web site(s). For more information on the cookies used by our website, please see our Cookies Policy which is available at: <https://www.propertypal.com/cookie-policy>.

Our website's servers automatically record 'log files' containing information about the volume and characteristics of our website's website traffic (e.g. IP address, numbers of pages viewed, length of time spent on our website). Log files are used to build pictures of how our website is used that help to monitor and improve the service provided by our website. You cannot be identified from your log files.

### **3. HOW WE USE YOUR PERSONAL DATA**

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

- Where we need to perform the contract we are about to enter into or have entered into with you, for the purposes contemplated in any separate terms of use for our website that you have entered into, including for the purposes set out in the "Our Standard Business Operations" section below.
- 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.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

We may process your personal data for more than one lawful ground

depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data.

#### **Our Standard Business Operations:**

- To provide the services that we contract to do so with you;
- To provide you with information that you request from us;
- To confirm your identity as a natural living person; and
- As part of our billing, payments and recovery processes.

#### **Marketing**

We may use your personal data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will only receive marketing communications from us if you have opted to receive it. This includes where you have consented to being contacted by PropertyPal Mortgages by email or telephone to discuss mortgage or protection quotes and related information.

We strive to provide you with choices regarding personal data uses for marketing and advertising and currently use E-Keeper (and will shortly be migrating to Salesforce) to manage our email correspondence. You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us, as appropriate, at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service purchase, service experience or other transactions.

#### **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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

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.

#### **Testimonials**

We may post customer testimonials and comments on our websites or other platforms, which may contain personal data. We will obtain your consent via email prior to posting your name and testimonial.

#### **Legal Requirements**

We will keep and use your data in terms of any legal or regulatory requirements that we have and can use your data to protect our legal position, if legal action is required, including the recovery of any outstanding debts.

By way of further example, we will share your personal data with the relevant agencies and without notice, where we are requested to or suspect fraudulent activities, money laundering, terrorist related activities.

#### **Enhancing our Services**

We may use personal data (other than that comprised in private personal data) for the purposes of providing, enhancing, or improving our services.

#### **Website Administration and Customisation**

We may use the information we collect about you for a variety of website administration and customisation purposes. For example, we use your information to process your registration request, provide you with services and communications that you have requested, send you email updates and other communications, customise features and advertising that appear on our websites, deliver our websites content to you, measure website traffic, measure user interests and traffic patterns, and improve our websites and the services and features offered via our websites.

#### **Children**

Our website is not intended to be used by children under 13 years old. We will never knowingly collect data from children below 13 years old. If you

become aware of such a child (or another person) supplying data to us, please contact us.

Generally our services are not intended to be used by children under 18 years old, and we do not provide our mortgage or protection product services to children under 18.

Please note that, as noted above, we may collect data on children from their parents or guardians where this is relevant for the purposes of the products or services that are being requested by such parents or guardians (for example, names and dates of birth of dependent children for the purposes of protection or assurance products).

We will take care when processing such data and only do so where one of the legal grounds set out above applies.

#### 4. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the categories of data processors or data controllers set out below for the purposes set out in paragraph 3 above or otherwise below:

##### General Disclosures

- with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the Companies Act 2006, or our affiliated companies, including PropertyPal.com Limited;
- with HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances;
- with third party purchasers, if we buy, sell or merge any business or assets of our business and are required to share data as part of the buying, selling or merger agreement or if our assets are acquired by a third-party, and data is transferred as part of the purchased assets. If any such change happens, we will ensure that it is under terms that preserve the confidentiality of your personal data, and we will notify you on our website or by email before any transfer of your personal data. Any purchaser would be bound by the terms of this notice as regards your data;
- with professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the European Union or United Kingdom who provide consultancy, banking, legal, insurance and accounting services, where they have a need to know same for any of the purposes set out above;
- with reputable and trusted third-parties where we have asked them to contact you on our behalf, where you have given us consent, it is part of our contractual agreement, is a legal requirement or there is clear legitimate interest between us (these services may include sending you email, calling you by telephone, sending you information through the post etc.); and
- with specific selected third parties, determined by us, if you breach any agreement with us, including so as to enforce our rights against you, including credit-reference agencies, debt-collection firms or service providers, solicitors or barristers and law enforcement agencies (if applicable);
- where you have consented to sub-contractor mylastwill Ltd (UK company number 11667075)
- with service providers acting as processors based in the European Union or United Kingdom who provide IT and system administration services, as set out generally below:
  - with email marketing services i.e. Mailchimp to send news articles and marketing emails about new products and services where you have opted in to receiving them. You can unsubscribe directly from any mailing list using the unsubscribe links provided within emails; and
  - with analytical service providers in order to analyse our website traffic to improve products and services,

and as further set out in respect of the various other services we provide below.

#### Mortgage Data and Protection Data Disclosures

We also share certain mortgage data and protection data specifically with the following entities:

- various mortgage lenders who have been carefully selected by the Primis Network and are all authorised and regulated by the Financial Conduct Authority (FCA). Full mortgage data will be provided to your chosen lender, whereas potential lenders will only receive more limited information;
- the Primis Network, where we are required to provide them with data to facilitate the provision of our products and services, and for regulatory and compliance purposes; or
- We also share mortgage data with the following service providers:
  - processors offering software products provided by the Primis Network for the purposes of compliance and the provision of financial advice within the bounds of the law and in order to provide quotes for protection products and services;
  - with processors offering software products that are used to schedule and host meetings with you, review & sign documents and to explain our recommendations. We remove any personal data from these products after the purpose for which they have been used, has been satisfied;
  - with processors offering software tools that are used to store personal information provided by you for the purposes of managing your mortgage and protection product applications e.g. proofs of income and identify; and
  - with processors offering software tools that are used to manage our communications with you whether you are mortgage and protection client, considering becoming a client or have completed your mortgage and protection product journey with us; and
- with introducers in order to track general progress of your mortgage journey in order to satisfy part of our contractual agreement with them.

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 the minimal personal data required for the specified purposes and in accordance with our instructions.

We do not share, sell, rent, or trade personal data with third parties for their commercial purposes.

Any medical data you provide to us may be shared with companies we have recommended to you for the purposes of allowing them and us to provide you with or recommend suitable protection products.

These providers have been carefully selected by the Primis Network and are all regulated by the FCA. A full list of providers to whom this data may be disclosed is available from us on request. We will only share your medical data where you have expressly consented to us doing so. Your medical data will not be shared with any other third parties.

We may also share personal data with your permission, so we can perform services you have requested, or use it in other ways you may have authorised.

#### Third-Party Marketing

We will get your express opt-in consent before we share your personal data with any company outside of our own (or our affiliated companies) for marketing purposes. This includes where we refer you to third party providers of wills services, such as mylastwill Ltd.

#### 5. INTERNATIONAL TRANSFERS

The EEA, UK and other countries outside the EEA and the UK have differing data protection laws, some of which may provide lower levels of protection of privacy.

It is sometimes necessary for us to share your personal data to countries outside the UK and EEA. In those cases we will comply with applicable UK and EEA laws designed to ensure the privacy of your personal data (such as putting in place model clauses designed to ensure the privacy of your personal data).

For example, we will transfer your personal data to Asana, Hello Sign and Google Drive, providers of third party software services to us, who are located in the USA.

As we are based in the UK we will also transfer your personal data from the EEA (where you are based in the EEA) to the UK.

We will also ensure all protections required by applicable UK and EEA laws are in place before transferring personal data to any organisation or body (or its subordinate bodies) governed by public international law or set up by, or on the basis of, an agreement between two or more countries (international organisations). We may transfer your personal data to the following international organisations insert.

Under data protection laws, we can only transfer your personal data to a country outside the UK/EEA or to an international organisation where:

- in the case of transfers subject to UK data protection law, the UK government has decided the particular country ensures an adequate level of protection of personal data (known as an 'adequacy regulation') further to Article 45 of the UK GDPR;
- in the case of transfers subject to EEA data protection laws, the European Commission has decided that the particular country ensures an adequate level of protection of personal data (known as an 'adequacy decision') further to Article 45 of the EU GDPR;
- there are appropriate safeguards in place, together with enforceable rights and effective legal remedies for you; or
- a specific exception applies under relevant data protection law.

Where we transfer your personal data outside the UK we do so on the basis of an adequacy regulation or (where such is not available) insert, e.g. legally-approved standard data protection clauses recognised or issued further to Article 46(2) of the UK GDPR. In the event we cannot or choose not to continue to rely on either of those mechanisms at any time we will not transfer your personal data outside the UK unless we can do so on the basis of an alternative mechanism or exception provided by UK data protection law.

Where we transfer your personal data outside the EEA we do so on the basis of the UK interim bridge or an adequacy decision or (where such is not available) insert, e.g. legally-approved standard data protection clauses issued further to Article 46(2) of the EU GDPR. In the event we cannot or choose not to continue to rely on either of those mechanisms at any time we will not transfer your personal data outside the EEA unless we can do so on the basis of an alternative mechanism or exception provided by applicable data protection law.

Any changes to the destinations to which we send personal data or in the transfer mechanisms we use to transfer personal data internationally will be notified to you in accordance with the Section 9 on 'Changes to this Notice' below.

## 6. 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.

No method of transmission, or method of electronic storage, is 100% secure. Although we will take all reasonable measures to protect your personal data, we cannot guarantee its security. Any transmission is at your own risk.

## 7. PERSONAL DATA RETENTION

### How long will you use my Personal data for?

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, 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.

We will keep your personal data for the term you have consented to, the contracted term between us where there is a legitimate interest for us to remain in contact with you, or for the legally required period, whichever is the longest.

By law we have to keep basic information about the customers (including contact, identity, financial and transaction data) of our mortgage services or protection services for seven years after you cease being a customer for tax or liability purposes. We may also keep the associated mortgage data or protection data, although this may be deleted at an earlier date.

For the purposes of contract administration, we will also store all personal data as long as the contract you have placed through us endures, i.e. the term of your mortgage or protection policy.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## 8. YOUR LEGAL RIGHTS

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

**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.

Please 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 contact us.

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. Alternatively, we may refuse to comply with your request in these circumstances.

Where you exercise one of your rights, we may need to request specific information from you to help us confirm your identity and ensure your right to exercise such 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 and keep you updated.

## 9. HOW DO YOU RESPOND TO COMPELLED DISCLOSURE REQUIREMENTS?

We may disclose personal data or other information we collect about you to law enforcement in response to a valid subpoena, court order, warrant, or similar governmental order, or when we believe in good faith that disclosure is reasonably necessary to protect our property or rights, or those of third parties or the public at large.

In complying with court orders and similar legal processes, we strive for transparency. When permitted, we will make a reasonable effort to notify users of any disclosure of their information, unless we are prohibited by law or court order from doing so, or in rare, exigent circumstances.

## 10. LEGAL

### Changes to this Notice

We may change this notice from time to time. Any material changes to this notice will be notified to you.

### Choice of Law and Jurisdiction

This notice shall be governed by and interpreted in accordance with the laws of Northern Ireland and you irrevocably agree that the courts of Northern Ireland shall have exclusive jurisdiction to settle any dispute which may arise out of, under, or in connection with this notice.

## GLOSSARY

### Comply with a legal or regulatory obligation

means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to;

### Personal Data

means any personal information we hold on you;

### Performance of a Contract

means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract;

### EEA

means European Economic Area;

### GDPR

has the meaning given in Section 1;

### ICO

means the Information Commissioner's Office - the UK data protection regulatory body;

### Legitimate Interest

means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law);

### Third party(ies)

refers to external suppliers who your personal data may be shared with;

### We, us, our

means PropertyPal Mortgages Limited;

### You, your, data subject,

relates to you as a natural living person; and

### Your representative

means someone or some people who legally acting on your behalf.