



This Privacy Policy is issued on behalf of the United Mortgages NI. As such, any references to “United Mortgages” “we”, “us” or “our” in this Privacy Policy are references to the relevant company (as named above). United Mortgages NI is responsible for processing your data.

OUR COMMITMENT

United Mortgages NI is committed to protecting your personal information and other data provided to United Mortgages NI via this website. If United Mortgages NI requests information from which you could be identified (“**personal data**”), information of this type will only be used in accordance with this Privacy Policy.

It is important that you read this Privacy Policy together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Privacy Policy supplements the other notices and is not intended to override them.

United Mortgages NI products and services are not designed to appeal to or not available for persons under the age of 18. Therefore, United Mortgages NI does not knowingly attempt to solicit or receive any information from anyone under the age of 18.

LAWFUL BASIS OF PROCESSING

Under data protection laws, United Mortgages NI must have legal bases in order to process your personal data. The legal bases on which United Mortgages NI may process your data are:

- **Consent:** where you have consented for us to process your personal data for one or more specific reasons
- **Performance of a contract:** in order to perform a contract we may have with you
- **Legal obligation:** where processing of the data is required by law.
- **Legitimate interest:** in order to carry on the purposes of United Mortgages NI

· business of processing your personal data on the basis that we have a legitimate interest in preventing fraud and money laundering, and to verify identity, in order to protect our business and to comply with laws that apply to us; in order to understand how people interact with our website; to provide communication which we think will be of interest to you, to determine the effectiveness of promotional campaigns and advertising.

WHAT INFORMATION DOES UNITED MORTGAGES NI COLLECT AND HOW DOES UNITED MORTGAGES NI COLLECT THIS INFORMATION FROM YOU?

United Mortgages NI may need to collect information about you and your computer to allow you to use some services, including:

· **Identity data:** First name, maiden name, last name, email, marital status, title, date of birth and gender.

· **Contact data:** billing address, email address and telephone numbers.

· **Financial data:** bank account and payment card details.

· **Transaction data:** details about payments to and from you and other details of products and services you have purchased from us.

· **Technical data:** internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

· **Profile data:** your username and password, your interests, preferences, feedback and survey responses

· **Usage data:** information about how you use our website, products and services.

· **Marketing and communications data:** your preferences in receiving marketing from us and our third parties and your communication preferences.

The information may be collected:

· **Directly** when you register or log on to the website or when you choose to use an available United Mortgages NI service via the website, including when you fill out forms, transfer any policies into our agency, upload any documentation, send United Mortgages NI any communication by email, fax or post, make an enquiry, complete the United Mortgages NI risk profiling questionnaire or any other communication that United Mortgages NI receives directly or indirectly from you.

· **As you browse the United Mortgages NI website**, including information relating to your browsing patterns and technical data about the equipment you are using to access the

website is automatically collected using cookies, server logs and other similar technologies.

· **Automatically:** as you browse the United Mortgages NI website certain information relating to your browsing patterns and technical data about the equipment you are using to access the website is automatically collected using cookies, server logs and other similar technologies.

WHAT DOES UNITED MORTGAGES NI DO WITH THIS INFORMATION?

United Mortgages NI may use your personal data for the following purposes:

- to provide the requested services to you;
- to monitor traffic patterns and usage of the website to help to improve the website design and layout;
- to record and store communications made via phone, Skype or the website chat function;
- in accordance with United Mortgages NI's legitimate interests (in circumstances where your interests and fundamental rights do not override United Mortgages NI's interests);
- to personalise your experience on the United Mortgages NI website or communications/advertising;
- to provide customer service, including to respond to your enquiries and fulfil any of your requests for information;
- to send you important information regarding the United Mortgages NI services and/or other technical notices, updates, security alerts, and support and administrative messages; and
- as United Mortgages NI believes to be necessary or appropriate:
 - o in order to comply with a legal obligation. This applies where the processing is necessary for United Mortgages NI to comply with the law;
 - o to enforce or apply this Privacy Policy; and
 - o to protect United Mortgages NI legitimate rights, privacy, property or safety, and/or those of a third party and your rights do not override those interests.

Fraud

We may carry out fraud prevention checks using fraud prevention databases. If false or inaccurate information is provided, and/or fraud is identified, details will be passed to fraud prevention agencies. Law enforcement agencies may access and use this information. We may access and use the information recorded by fraud prevention agencies from other countries.

We process your personal data on the basis that we have a legitimate interest in preventing fraud and money laundering, and to verify identity, in order to protect our business and to comply with laws that apply to us. Such processing is also a contractual requirement of the services you have requested.

Fraud prevention agencies can hold your personal data for different periods of time, and if you are considered to pose a fraud or money laundering risk, your data can be held for up to six years.

A record of any fraud or money laundering risk will be retained by the fraud prevention agencies, and may result in others refusing to provide services, financing or employment to you. If you have any questions about this, please contact us at: stephen@unitedmortgagesni.co.uk

If we, or a fraud prevention agency, determine that you pose a fraud or money laundering risk, we may refuse to provide the services you have requested, or we may stop providing existing services to you.

Automated decisions

As part of the processing of your personal data, decisions may be made by automated means. This means we may automatically decide that you pose a fraud or money laundering risk or if our processing reveals your behaviour to be consistent with that of known fraudsters or money launderers; or is inconsistent with your previous submissions; or you appear to have deliberately hidden your true identity. You have rights in relation to automated decision making: if you want to know more please contact us at: stephen@unitedmortgagesni.co.uk

In order to carry out your instructions, United Mortgages NI may also pre-populate the forms of third party websites with the personal data you have supplied us with. This may be done manually or through secure and encrypted data transfers. It is your responsibility to check that the pre-populated data fields are correct. United Mortgages NI bears no responsibility for any problems with any applications to third-party companies that arise from any errors or inaccuracies in pre-populated data fields on application forms which we complete on your behalf.

RETENTION OF YOUR DATA

United Mortgages NI will not retain your personal data for longer than is necessary for the purposes for which the personal data is processed. This means that your data will only be retained for as long as it is still required to provide you with services or is necessary for legal reasons. When calculating the appropriate retention period for your data, United

Mortgages NI considers the nature and sensitivity of the data, the purposes for which United Mortgages NI is processing the data, and any applicable statutory retention periods. Using these criteria, United Mortgages NI regularly reviews the personal data which we hold and the purposes for which it is held and processed.

When United Mortgages NI determines that personal data can no longer be retained (or where you request United Mortgages NI to delete your data in accordance with your right to do so (please see below for more information), United Mortgages NI ensures that this data is securely deleted or destroyed.

However, please note that, in some circumstances United Mortgages NI may decide to retain your personal data for research or statistical purposes and, in such circumstances, United Mortgages NI will anonymise your data before retaining it.

For more details about United Mortgages NI retention periods, please contact United Mortgages NI at stephen@unitedmortgagesni.co.uk

ACCURACY OF YOUR DATA

It is important that the personal data United Mortgages NI holds about you is accurate and current. Please keep United Mortgages NI informed if your personal data changes during your relationship with us.

SECURITY OF YOUR DATA

In order to protect your personal data, United Mortgages NI has appropriate organisational and technical security measures. These measures include storing data on a dedicated and secure server with at least 256-bit encryption, restricting access to your personal data to certain employees, ensuring the United Mortgages NI internal IT systems are suitably secure, and implementing procedures to deal with any suspected data breach.

In the unlikely event of a data breach, United Mortgages NI will take steps to mitigate any loss or destruction of data and, if required, will notify you and any applicable authority of such a breach.

In addition to the above, where United Mortgages NI has given you (or where you have chosen) a password which enables you to access certain parts of the website, you are responsible for keeping this password confidential and should not share your password with anyone.

DATA TRANSFERS AND SHARING YOUR DATA WITH THIRD PARTIES

United Mortgages NI will not disclose your personal data to third parties other than as described in this section unless it is otherwise legally permitted or required to do so.

United Mortgages NI may also need to pass your information to third party service providers which maintain, administer or develop the website on our behalf and the information will only be provided for such limited purposes and as detailed below. In addition, United Mortgages NI may provide aggregate statistics about its customers, sales, traffic patterns and related website information to reputable third-parties, but these statistics will include no personally identifiable information.

The third parties to which United Mortgages NI may transfer your personal data including, but not limited to (and who may change from time to time) –

- our Identity validation agencies;
- Our SIPP providers;
- Our CRM providers;
- Our Compliance advisers
- Our Product specialists
- Our solicitors

The security of your data is important to us and United Mortgages NI will, therefore, only transfer your data to such third parties if:

- you have expressly consented to your data being shared with specific third parties;
- the third party needs to access the personal data for the purposes of providing any contracted services to you;
- the third party has agreed to comply with United Mortgages NI's instructions, required data security standards, policies, and procedures and put adequate security measures in place;
- the transfer complies with any applicable cross border transfer restrictions and suitable safeguards have been put in place; and
- a fully executed written contract that contains suitable obligations and protections has been entered into between the parties.

You acknowledge and agree that United Mortgages NI may send your information outside of the European Economic Area for processing or use in accordance with this Privacy Policy. As mentioned above, United Mortgages NI will only transfer your data where suitable safeguards have been put in place.

For more information on the safeguards used by United Mortgages NI when transferring personal data to third parties, please contact United Mortgages NI

at: stephen@unitedmortgagesni.co.uk

YOUR RIGHTS

Your personal data is protected by legal rights, which include:

- **Right to rectification:** you have the right to require us to correct any inaccuracies in your data.
- **Right to erasure: you have the right to require us to delete your data, subject to certain legal requirements.**
- **Right to restriction of processing:** you have the right to require us to restrict the way in which we process your personal data. You may wish to restrict processing if, for example:

§ You contest the accuracy of the data and wish to have it corrected;

§ You object to processing but we are required to retain the data for reasons of public interest; or

§ If you would prefer restriction to erasure.

- **Right to data portability: you have the right to obtain from us easily and securely the personal data we hold on you for any purpose you see fit.**
- **Right to object to processing:** you have the right to require us to stop processing your personal data should you wish the data to be retained but no longer processed.
- **Right of access:** you have the right to request access to personal data that we may process about you.
- **Right to withdraw consent:** you have the right at any time to withdraw consent allowing us to process your personal data.

If you would like to exercise any of the above rights, please:

- put your request in writing;
- include proof of your identity (such as a copy of your driving licence or passport) and address (such as a recent utility or credit card bill); and
- specify the right you wish to exercise.

For more information or to exercise your data protection rights please, please contact us at: stephen@unitedmortgagesni.co.uk

We will respond to requests made by you within one month.

MARKETING

United Mortgages NI may use your personal data to notify you of news about United Mortgages NI, changes to the website, special events or new services that United Mortgages NI thinks may be of interest to you if you have consented to, and have not at any point opted out from, receiving marketing communications.

If, at any time, you would rather not receive such information, please contact United Mortgages NI in writing, either by post or email (to stephen@unitedmortgagesni.co.uk) to let us know. We will process your request to be opted-out of marketing within 30 days of receipt.

If you ask not to receive such news, United Mortgages NI will still need to keep your personal data so that you can continue to use the website and so that United Mortgages NI can deal with the administration and security of the website. United Mortgages NI will still contact you by email or post for anything necessary for the administration of your membership and to comply with any legal or other important conditions; however, United Mortgages NI will not then email you or contact you for promotional purposes without your subsequent consent.

COOKIES

For more information about the cookies we use, please see our Cookies Policy.

CHANGES TO THE PRIVACY POLICY

No changes to this Privacy Policy are valid or have any effect unless agreed by us in writing. We reserve the right to vary this Privacy Policy from time to time. Our updated terms will be displayed on the United Mortgages NI website. It is your responsibility to check this Privacy Policy from time to time to verify such variations.

LINKS TO OTHER WEBSITES

The United Mortgages NI website may contain links to and from other third party websites of interest (advertisers and affiliates). However, once you leave this website, be aware that United Mortgages NI does not have any control over such websites. Therefore, United Mortgages NI cannot be responsible for the protection and privacy of any information which you provide whilst visiting such websites and such websites are not governed by this Privacy Policy. You should exercise caution and look at the privacy policy applicable to the website in question.

The basis upon which our Network will deal with Your Information, Your Special Data and Criminal Disclosures

Our Network is authorised and regulated by the Financial Conduct Authority (FCA). Our Network is responsible for the quality of the advice that we provide to you in relation to

your mortgage and/or insurance products, where those products are regulated by the FCA. In the course of doing so, our Network will also process Your Information generally, including Your Special Data and Criminal Disclosures.

In the course of handling Your Information and Your Special Data/Criminal Disclosures our Network will:

record and store Your Information and Your Special Data/Criminal Disclosures on Network systems run on secure servers. Your Information and Your Special Data/Criminal Disclosures will be accessed by authorised employees and consultants within, or engaged, by the Network as necessary for the purposes of supervision, training, quality audits, customer surveys and complaint handling or otherwise to comply with any other legal or regulatory obligation the Network may have

use, and where appropriate transmit, Your Information and Your Special Data/Criminal Disclosures to respond to any request from the FCA, the Financial Ombudsman Service, HMRC, the Office of the Information Commissioner or any other regulatory, law enforcement or governmental body

need to access and process Your Information and Your Special Data/Criminal Disclosures to deal with enquiries received from mortgage lenders and insurance providers that relate to the service this Firm has provided to you, including the payment of any commission or fees to us that may be linked to the product you have taken out.

Your Information and Your Special Data/Criminal Disclosures will be retained by our Network either electronically or in paper format for a minimum of six years and possibly for a longer period where this is required to enable the Network to fulfil its legal and regulatory obligations.

Please note that the above information is a summary of the Network Privacy Policy for customers. If, you wish to understand in more detail what the Network will do with Your Information and Special Data/Criminal Disclosures then please visit the Network Privacy Policy for customers located at <http://www.primis.co.uk/privacy-policy-and-tcs>