

# Fair Processing Notice



Version 4

## Introduction

We are Fleet Mortgages Limited, the data controller, and we can be contacted by telephone on 01252 916800 or by post at 2nd Floor, Flagship House, Reading Road North, Fleet, Hampshire, GU51 4WP.

Our data protection officer (DPO) can be contacted on the same telephone number and at the same address but also by e-mail at [legalcompliance@fleetmortgages.co.uk](mailto:legalcompliance@fleetmortgages.co.uk).

Before we provide services, goods or financing to you, we undertake checks for the purposes of preventing fraud and money laundering, and to verify your identity. These checks require us to process personal data about you.

## What We Process and Share

The personal data you have provided, we collect from you, or we have received from third parties will be used to process your application, prevent fraud and money laundering, and to verify your identity.

Details of the personal information that will be processed include for example your:

- name
- date of birth
- residential address and address history
- contact details such as email address and telephone numbers
- financial information
- employment details (if applicable)
- identifiers assigned to your computer or other internet connected device including your Internet Protocol (IP) address
- vehicle details (if applicable).

When we and fraud prevention agencies process your personal data, we do so on the basis that we have a contractual necessity as we need your personal data to process your application, to operate and administer your mortgage account with us, to exercise, protect and transfer our rights and to obtain finance, including taking pre-contractual steps, and a legal obligation and 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 or financing you have requested.

We, and fraud prevention agencies, may also enable law enforcement agencies to access and use your personal data to detect, investigate and prevent crime. 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. We hold your personal data for 6 years after the end of any mortgage contract.

We record all calls and retain the recordings of those calls in accordance with our retention periods. These calls will contain your personal data where you are identified or identifiable.

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## 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 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 using the details above.

## Consequences of Processing

We process your personal data to process your application, to operate and administer any product or services that we provide you with or at your request or otherwise and to exercise, protect and transfer our rights. If we, or a fraud prevention agency, determine that you pose a fraud or money laundering risk, we may refuse to provide the services and financing you have requested, or to employ you, or we may stop providing existing services to you.

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 on the details above.

We share your personal data with certain data processors to enable us to process your application, to operate and administer any product or services that we provide you with or at your request or otherwise and to exercise, protect and transfer our rights. We take steps to ensure that these data processors protect your personal data to the same level as we protect it and they can only use your data to provide these services to us and for no other reason. We may also share your personal data with our legal, financial, tax and audit service providers for our legitimate business interests and compliance with our legal and contractual obligations and for claims management purposes.

## International Data Transfers

Whenever fraud prevention agencies transfer your personal data outside of the European Economic Area, they impose contractual obligations on the recipients of that data to protect your personal data to the standard required in the European Economic Area by use of the standard contractual clauses of the European Commission entered into by the entities concerned:

**(<http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32004D0915>)**

**(<http://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX%3A32010D0087>)**

They may also require the recipient to subscribe to 'international frameworks' intended to enable secure data sharing. If you would like a copy of these data transfer agreements, please contact us directly.

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## Data Security

We use industry standard technical and organisational measures to keep your personal data secure.

## Your Rights

Your personal data is protected by legal rights, which include your rights to request the following:

- object to our processing of your personal data;
- restrict the processing of your personal data;
- request that your personal data is erased and/or corrected;
- porting of your personal data (the right to portability allows you to obtain some of your data in an open, machine-readable format) where the data is processed on the ground of consent and by automated means;
- request access to your personal data.

For more information or to exercise your data protection rights, please contact us using the contact details above. Please note that your rights are subject to the applicable data protection requirements and they are not absolute.

If you are unhappy about how your personal data has been used please refer to our Customer Complaints Handling Procedure which appears on the "Literature" page of our website at [www.fleetmortgages.co.uk](http://www.fleetmortgages.co.uk) or you may contact our DPO at [legalcompliance@fleetmortgages.co.uk](mailto:legalcompliance@fleetmortgages.co.uk). You also have a right to complain to the Information Commissioner's Office [www.ico.org.uk](http://www.ico.org.uk) which regulates the processing of personal data.