BTJ MORTGAGES LTD

DATA PRIVACY NOTICE

We take your privacy very seriously and *we* ask that you read this privacy notice carefully as it contains important information on who *we* are, how and why *we* collect, store, use and share personal data, your rights in relation to your personal data and on how to contact *us* and supervisory authorities in the event you have a complaint.

Italicised words in this privacy notice have the meaning set out in the Glossary of Terms at the end of this document.

Who we are

BTJ Mortgages LTD collects, uses and is responsible for certain personal data about you. When *we* do so *we* are required to comply with *data protection regulation* and *we* are responsible as a *data controller* of that personal data for the purposes of those laws.

When *we* mention "BTJ Mortgages", "*we*", "*us*" or "*our*" we are referring to BTJ Mortgages LTD.

We provide you with *intermediary services* in relation to the *products*. As explained in initial disclosure document.

We, BTJ Mortgages LTD are an appointed representative of Sesame Limited. Sesame Limited is a company registered in England and Wales (company number 2844161) whose registered office is at Pixham End, Dorking, Surrey RH4 1QA. Sesame Limited is authorised and regulated by the Financial Conduct Authority. Sesame Limited's Financial Services Register number is 150427.

We and Sesame Limited have certain shared systems (and so shared access to your personal data). This means that in respect of certain personal data of yours, *we* and Sesame Limited will be joint *data controllers*.

The manner in which Sesame Limited will process your personal data is set out in a separate privacy notice which *we* will provide you with at the start of *our* engagement. If you require a further copy of this privacy notice, please contact Sesame Limited at dataprivacy@sbg.co.uk or Data Protection Officer, Sesame Limited, Fourth Floor, Jackson House, Sibson Rd, Sale M33 7RR.

The personal data we collect and use

In the course of *our intermediary services we* may collect the following personal data when you provide it to *us*:

- *contact information*
- *identity information*
- *financial information*
- *employment status*
- *lifestyle information*
- *health information*
- data about criminal convictions or offences
- details of any *vulnerability*
- details of your dependents and/or beneficiaries under a policy **(If you are providing information about another person we expect you to ensure that they know you are doing so and are content with their information being provided to *us*. You might find it helpful to show them this privacy notice and if they have any concerns please contact *us* in one of the ways described below.)**
- *product* details

Information collected from other sources

We also obtain personal data from other sources in the course of providing our *intermediary services*. Where *we* obtain this information from another party it is their responsibility to make sure they explain that they will be sharing personal data with *us* and, where necessary, ask permission before sharing information with *us*.

The personal data *we* obtain from other sources may include the following:

- From *lenders* and/or *product providers*:
  - *product* details
- From Sesame Limited:
  - details of any complaint about *our* services and/or the suitability of any advice *we* give you
- From identification and verification checking agencies:
  - *identity information*
  - *sanction check information*

How we use your personal data

The below table sets out:

- how *we* use your personal data
- the lawful bases upon which *we* collect and use your personal data
- who *we* routinely share your personal data with (some of these third party recipients may be based outside the European Economic Area — for further information including on how *we* safeguard your personal data when this occurs, see 'Transfer of your information out of the EEA' below)

Rationale/Reason for Processing	Lawful Basis for Processing	Third party recipients linked to that activity
• to provide you with *intermediary services* • to assist in the administration of any *products* you have obtained through *us*	Performance of a contract	Sesame Limited
• to apply for decisions in principle for mortgage products and/or quotations for protection	Performance of a contract	*Lenders/product providers* External supplier(s) of software services through

and/or general insurance products on your behalf • to apply for *products* on your behalf		which *we* review, source and apply for decisions in principle, quotations and/or *products* on your behalf
• to manage complaints	Compliance with a legal obligation	Sesame Limited *Our* external solicitors *Our* professional indemnity insurers and insurance adviser
• to manage legal claims	Legitimate interests [– *we* have a legitimate interest in protecting *ourselves* from breaches of legal obligations owed to *us* and to defend *ourselves* from litigation. This is needed to ensure that *our* legal rights and interests are managed appropriately]	Sesame Limited *Our* external solicitors *Our* professional indemnity insurers and insurance adviser
• to share with Sesame Limited as the company responsible for making sure that all sales *we* make to you and advice *we* give to you are compliant with the rules and regulations that apply to financial services in the UK and with their policies and procedures	Compliance with a legal obligation	Sesame Limited
• to obtain feedback from you on the service you have received from *us*	Legitimate interests [– *we* have a legitimate interest in operating *our* business. This includes ensuring that the service we provide is of a satisfactory standard]	Sesame Limited External supplier(s) of software services to obtain feedback from you
• to retain records of any services or advice provided to you in accordance with *our* regulatory obligations	Compliance with a legal obligation	External supplier(s) of data storage and data hosting services to retain records on *our* behalf
• to retain records of any services or advice provided to you by your *adviser* in order to defend potential legal claims or complaints	Legitimate interests [– *we* have a legitimate interest in defending *ourselves* from legal claims and complaints. This is needed to ensure that *our* legal rights and interests are managed appropriately]	External supplier(s) of data storage and data hosting services to retain records on *our* behalf
• to provide you with details of products and services from us and third parties that may be of interest to you in accordance with your preferences. For more information see 'Marketing' below	[Consent][Legitimate interests]	n/a
• to detect, prevent and investigate fraudulent applications for *products* • to undertake investigations into allegations of misconduct and/or criminal offences • to notify the relevant authorities of any suspicious activity following an investigation undertaken by *us* into allegations of misconduct and/or criminal offences	Compliance with a legal obligation. [*We* also consider that we have a legitimate interest in protecting *ourselves*, other parties and the financial services industry more widely in detecting, preventing and investigating financial crime and/or misconduct]	The Financial Conduct Authority *Lenders/product providers* Sesame Limited National Crime Agency (NCA) Police HMRC
• to undertake anti-money laundering, identification and verification checks, including assessment of your *sanction check information* (any personal data obtained for the purposes of meeting with The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 will only be processed for the purposes of preventing money laundering or terrorist financing, unless	Compliance with a legal obligation	Sesame Limited External supplier(s) to conduct anti-money laundering, identification and verification checks on *our* behalf *Lenders/product providers*

the use of the data is permitted by or under another enactment other than those Regulations, or *we* have another lawful basis for processing it)		
• to evidence satisfaction of any request made by you in accordance with your rights under *data protection regulation*	Compliance with a legal obligation	Information Commissioner's Office

Special category data and criminal records data

Certain types of personal data are considered more sensitive and so are subject to additional levels of protection under data protection legislation. These are known as 'special categories of data' and include data concerning your health, racial or ethnic origin, genetic data and sexual orientation. Data relating to criminal convictions or offences is also subject to additional levels of protection.

We may process:

- *health information* and *lifestyle information* when providing *intermediary services* in relation to a protection insurance product; and/or
- criminal conviction or offence information when providing *intermediary services* in relation to a general insurance product.

In addition to the lawful basis for processing this information set out in the above table, *we* will be processing it either (i) for the purpose of advising on, arranging or administering an insurance contract or (ii) for the establishment, exercise or defence of legal claims.

In the course of our activities relating to the prevention, detection and investigation of financial crime, *we* may process criminal conviction or offence information. Where *we* do so, in addition to the lawful basis for processing this information set out in the above table, *we* will be processing it for the purpose of compliance with regulatory requirements relating to unlawful acts and dishonesty.

Marketing

We may use personal data we hold about you to help *us* identify, tailor and provide you with details of products and services from *us* that may be of interest to you. *We* will only do so where we have obtained your consent and then have a legitimate business reason to do this and will do so in accordance with any marketing preferences you have provided to *us*.

In addition, where you provided your consent, *we* may provide you with details of products and services of third parties where they may be of interest to you.

You can opt out of receiving marketing at any time. If you wish to amend your marketing preferences please contact us:

By phone: 07788552110

By email: jana@btjmortgages.co.uk

By Post: BTJ Mortgages LTD, Stallion cottage, Epping road, Nazeing, EN9 2DH

Whether information has to be provided by you, and if so why

We will tell you if providing some personal data is optional, including if *we* ask for your consent to process it. In all other cases you must provide your personal data in order for *us* to provide you with *intermediary services*.

How long your personal data will be kept

We will hold your personal data for differing periods of time depending upon the reason we have for processing it. These retention periods are set out below.

Type of Record	Retention Period
Customer file containing a record of any *intermediary services* provided by *us*	For as long as *we* reasonably consider that: • *we* may need to deal with your queries • you might legally bring a claim against *us*
Complaint file containing a record of any claim you have brought against *us*	For as long as *we* reasonably consider that you might legally bring an additional or repeat claim against *us*
Marketing lists	*For as long as we are required/permitted to retain this personal data based upon our legal and regulatory obligations*
Results of anti-money laundering, identification and verification checks, including assessment of your *sanction check information*	For as long as *we* are required/permitted to retain this personal data based upon *our* legal and regulatory obligations
Fraud and financial crime files	For as long as *we* reasonably consider that: • *we* are required/ permitted to retain this personal data based upon *our* legal and regulatory obligations • they may be required in the establishment, exercise or defence of legal claims
Records of satisfaction of any request made by you in accordance with your rights under *data protection regulation*	3 years from the date the request was satisfied

Transfer of your information out of the EEA

We will not transfer your personal data outside of the European Economic Area or to any organisation (or subordinate bodies) governed by public international law or which is set up under any agreement between two or more countries.

You have a right to ask *us* for more information about the safeguards *we* have put in place as mentioned above. To learn more, please see 'Your rights' below.

Your rights

You have legal rights under *data protection regulation* in relation to your personal data. These are set out under the below headings:

- To access personal data
- To correct / erase personal data
- To restrict how *we* use personal data
- To object to how *we* use personal data
- To ask *us* to transfer personal data to another organisation
- To object to automated decisions
- To find out more about how *we* use personal data

We may ask you for proof of identity when making a request to exercise any of these rights. *We* do this to ensure *we* only disclose information or change your details where *we* know *we* are dealing with the right individual.

We will not ask for a fee, unless *we* think your request is unfounded, repetitive or excessive. Where a fee is necessary, *we* will inform you before proceeding with your request.

We aim to respond to all valid requests within one month. It may however take us longer if the request is particularly complicated or you have made several requests. *We* will always let you know if *we* think a response will take longer than one month. To speed up *our* response, *we* may ask you to provide more detail about what you want to receive or are concerned about.

We may not always be able to fully address your request, for example if it would impact the duty of confidentiality *we* owe to others, or if *we* are otherwise legally entitled to deal with the request in a different way.

To access personal data

You can ask *us* to confirm whether or not *we* have and are using your personal data. You can also ask to get a copy of your personal data from *us* and for information on how *we* process it.

To rectify / erase personal data

You can ask that *we* rectify any information about you which is incorrect. *We* will be happy to rectify such information but would need to verify the accuracy of the information first.

You can ask that *we* erase your personal data if you think *we* no longer need to use it for the purpose *we* collected it from you.

You can also ask that *we* erase your personal data if you have either withdrawn your consent to *us* using your information (if *we* originally asked for your consent to use your information), or exercised your right to object to further legitimate use of your information, or where *we* have used it unlawfully or where *we* are subject to a legal obligation to erase your personal data.

We may not always be able to comply with your request, for example where *we* need to keep using your personal data in order to comply with *our* legal obligation or where *we* need to use your personal data to establish, exercise or defend legal claims.

To restrict our use of personal data

You can ask that *we* restrict *our* use of your personal data in certain circumstances, for example

- where you think the information is inaccurate and *we* need to verify it;
- where *our* use of your personal data is not lawful but you do not want *us* to erase it;
- where the information is no longer required for the purposes for which it was collected but *we* need it to establish, exercise or defend legal claims; or
- where you have objected to *our* use of your personal data but *we* still need to verify if *we* have overriding grounds to use it.

We can continue to use your personal data following a request for restriction where *we* have your consent to use it; or *we* need to use it to establish, exercise or defend legal claims, or *we* need to use it to protect the rights of another individual or a company.

To object to use of personal data

You can object to any use of your personal data which *we* have justified on the basis of our legitimate interest, if you believe your fundamental rights and freedoms to data protection outweigh *our* legitimate interest in using the information. If you raise an objection, *we* may continue to use the personal data if *we* can demonstrate that *we* have compelling legitimate interests to use the information.

To request a transfer of personal data

You can ask *us* to provide your personal data to you in a structured, commonly used, machine-readable format, or you can ask to have it transferred directly to another *data controller* (e.g. another company).

You may only exercise this right where *we* use your personal data in order to perform a contract with you, or where *we* asked for your consent to use your personal data. This right does not apply to any personal data which *we* hold or process outside automated means.

To contest decisions based on automatic decision making

If *we* made a decision about you based solely by automated means (i.e. with no human intervention), and the decision made by *us* produces a legal effect concerning you, or significantly affects you, you may have the right to contest that decision, express your point of view and ask for a human review. These rights do not apply where *we* are authorised by law to make such decisions and have adopted suitable safeguards in *our* decision making processes to protect your rights and freedoms.

You can contact us for more information

If you are not satisfied with the level of information provided in this privacy notice, you can ask *us* about what personal data *we* have about you, what *we* use your information for, who *we* disclose your information to, whether *we* transfer it abroad, how *we* protect it, how long *we* keep it for, what rights you have, how you can make a complaint, where *we* got your data from and whether *we* have carried out any automated decision making using your personal data.

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

- email or write to [our Data Privacy Manager] at jana@btjmortgages.co.uk or BTJ Mortgages LTD, Stallion Cottage, Epping Road, Nazeing, EN9 2DH;
- let us have enough information to identify you, e.g. name, address, date of birth;
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and

- let us know the information to which your request relates.

Keeping your personal data secure

We have appropriate security measures in place to prevent personal data from being accidentally lost, or used or accessed in an unauthorised way. *We* limit access to your personal data to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. *We* will notify you and any applicable regulator of a suspected data security breach where *we* are legally required to do so.

Our supervisory authority

If you are not happy with the way *we* are handling your information, you have a right to lodge a complaint with the Information Commissioners Office (www.ico.org.uk).

We ask that you please attempt to resolve any issues with us before the ICO.

How to contact us

Please contact **[**our Data Privacy Manager**]** if you have any questions about this privacy notice or the information *we* hold about you.

If you wish to contact **[**our Data Privacy Manager**]**, please send an email to jana@btjmortgages.co.uk or write to BTJ Mortgages LTD, Stallion Cottage, Epping Road, Nazeing, EN9 2DH.

Glossary of Terms

we, **us** or **our**	BTJ Mortgages LTD a company registered in England and Wales (company number 09835228) and having its registered office at Stallion cottage, epping road, nazeing, en9 2dh.
contact information	these are details that can be used to contact a person, including title, first name, surname, personal telephone number, fax, email address, home address, country, postcode or city of residence. This may also include work contact information such as work telephone number, fax, work email and work address
data controller	means a natural or legal person (such as a company) which determines the means and purposes of processing of personal data. For example, *we* are your data controller as *we* determine how *we* will collect personal data from you, the scope of data which will be collected, and the purposes for which it will be used in the course of *us* providing you with *intermediary services*
data protection regulation	applicable data privacy and protection laws
employment status	this is information about your work, if you are employed, self-employed, unemployed, a student or on job seeker allowance
FCA	the Financial Conduct Authority, being the independent watchdog that regulates financial services
financial information	this is information relating to your financial status, including salary/income, outgoings/expenditure, tax rate and P60
health information	this is information relating to your medical history, including symptoms, diagnoses, procedures and outcomes, as well as information about your height and weight. This could include previous and current or persistent medical conditions and family medical history
identity information	this is any information that can be used to distinguish a person or verify their identity, such as name, date of birth, place of birth, gender, marital status, national identity card/number, passport, drivers licence and national insurance number
intermediary services	these are the services we provide to you in relation to the products, which may include: • advising on the *products* • applying for a decision in principle or quotation on your behalf in relation to a *product* • arranging or administering a *product* on your behalf
lenders	a mortgage lender and/or specialist mortgage distributor providing *us* with access to specialist lenders (for a list of current lenders which *we* work with, please contact *us* – see *How to contact us* above)
lifestyle information	this includes both work and leisure behaviour patterns. Most relevant to your *products* may be your smoker status, alcohol consumption, health, retirement age and exercise habits
product	this is a mortgage, protection and/or general insurance product in respect of which we provide *intermediary services* to you
product provider	a company which provides protection and/or general insurance products (for a list of product providers which *we* work with, please contact *us* – see *How to contact us* above)
sanction check information	this is information relating to your politically exposed persons (PEPs) status and Her Majesty's Treasury financial sanctions status, which is recorded to prevent fraud and money laundering
vulnerability	a vulnerable consumer is someone who, due to their personal circumstances, is especially susceptible to detriment, particularly when an advisory firm is not acting with appropriate levels of care. These customers are more likely to suffer severe detriment if something goes wrong. Details of vulnerability fall in to the following categories: health; resilience (financial); life events; and capability (financial knowledge/ confidence)