

# TOUCHSTONE

## CORPORATE LIMITED

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### **Customer Privacy Notice - 042026**

For the purpose of this privacy notice the data controller of your personal information is Touchstone Corporate Limited. **ICO Ref: ZA023529**

#### **Our legal grounds for holding your data:**

The UK's data protection laws allow us to use your personal data provided we have a lawful basis to do so. This includes sharing it in certain circumstances, as described below.

We consider we have the following reasons (legal bases) to use your personal data:

Performance of contract with you: we need to use your personal data to be able to successfully legally contract with you.

Compliance with our legal obligations: we need to use your personal data so as to comply with certain legislation such as financial crime legislation.

Legitimate interests: these are our business and commercial reasons for using your data, which we have balanced against your interests. We have certain legitimate interests in using your data which are not outweighed by your interests, fundamental rights or freedoms. These legitimate interests are to help prevent and detect financial crime, fraud and money laundering, to promote responsible lending, and to assist our compliance with the legal and regulatory requirements placed upon us.

Your consent: You can withdraw this consent at any time, in which case we will cease to use it, unless we have a right and a need to continue processing it for one of the other reasons set out above.

More information on how we use your personal data and for what purposes is set out below.

During the course of dealing with us, we will ask you to provide us with detailed personal information relating to your existing circumstances, your financial situation and in some cases your health and family health history (Your Personal Data).

This document is important as it allows us to explain to you what we will need to do with your Personal Data, and the various rights you have in relation to your Personal Data.

#### **What do we mean by "Personal Data"?**

**Your Personal Data** means any information that describes or relates to your personal circumstances.

Your Personal Data may identify you directly, for example your name, address, date or birth, National Insurance number and indirectly, for example, your employment situation, your physical and mental health history, or any other information that could be associated with your cultural or social identity.

In the context of providing you with assistance in relation to your Mortgage/Finance and/or insurance requirements Your Personal Data may include:

- 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 mortgage/finance and/or insurance products and the terms and conditions relating to these

### **The basis upon which our Firm will deal with Your Personal Data**

Where you ask us to assist you with for example your insurance, in particular life insurance and insurance that may assist you in the event of an accident or illness, we will ask you information about your ethnic origin, your health and medical history (**Your Special Data**). We will record and use Your Special Data in order to make enquiries of insurance providers in relation to insurance products that may meet your needs and to provide you with advice regarding the suitability of any product that may be available to you.

If you have parental responsibility for children under the age of 13, it is also very likely that we will record information on our systems that relates to those children and potentially, to their Special Data.

The arrangement of certain types of insurance may involve disclosure by you to us of information relating to historic or current criminal convictions or offences (together "**Criminal Disclosures**"). This is relevant to insurance related activities such as underwriting, claims and fraud management.

We will use Special Data and any Criminal Disclosures in the same way as Your Personal Data generally, as set out in this Privacy Notice.

Information on Special Category Data and Criminal Disclosures must be capable of being exchanged freely between insurance intermediaries such as Touchstone Corporate Limited, and insurance providers, to enable customers to secure the important insurance protection that their needs require.

### **How do we collect Your Personal Data?**

We will collect and record Your Personal Data from a variety of sources, but mainly directly from you. You will usually provide information during the course of our initial meetings or conversations with you to establish your circumstances and needs and preferences in relation to mortgages and insurance. You will provide information to us verbally and in writing, including email.

We may also obtain some information from third parties, for example, credit checks, information from your employer and searches of information in the public domain such as the voters roll. If we use technology solutions to assist in the collection of Your Personal Data, for example software that is able to verify your credit status, we will only do so if we have consent from you, for us, or our nominated processor to access your information in this manner. With regards to electronic ID checks we would not require your consent but will inform you of how such software operates and the purpose for which it is used.

**How We Use Your Personal Data** - In the course of handling Your Personal Data, we will:

Record and store Your Personal Data on our computer systems. This information can only be accessed by employees and advisors within our Firm and only when it is necessary to provide our service to you and to perform any administration tasks associated with or incidental to that service

Submit Your Personal Data to Product Providers/Mortgage Lenders/Commercial Lenders and/or Insurance Product providers both in paper form and electronic as well as on-line via a secure portal. The provision of this information to a third party is essential in allowing us to progress any enquiry or application made on your behalf and to deal with any additional questions or administrative issues that mortgage lenders and insurance providers may raise.

Use Your Personal Data for the purposes of responding to any queries you may have in relation to any mortgage/finance product or insurance policy you may take out, or to inform you of any developments in relation to those products and/or policies of which we might become aware

### **Sharing Your Personal Data**

From time to time Your Personal Data will be shared with Mortgage Lenders and Insurance providers as well as any other third parties including valuers. In each case, your Personal Data will only be shared for the purposes set out in this customer privacy notice, i.e. to progress your Mortgage/finance and/or insurance enquiry and to provide you with our professional services.

Please note that this sharing of Your Personal Data does not entitle such third parties to send you marketing or promotional messages: it is shared to ensure we can adequately fulfil our responsibilities to you, and as otherwise set out in this Customer Privacy Notice.

We do not envisage that the performance by us of our service will involve Your Personal Data being transferred outside of the European Economic Area.

### **Security and retention of Your Personal Data**

Your privacy is important to us and we will keep Your Personal Data secure in accordance with our legal responsibilities. We will take reasonable steps to safeguard Your Personal Data against it being accessed unlawfully or maliciously by a third party.

We also expect you to take reasonable steps to safeguard your own privacy when transferring information to us, such as not sending confidential information over unprotected email, ensuring email attachments are password protected or encrypted and only using secure methods of postage when original documentation is being sent to us.

Your Personal Data will be retained by us either electronically or in paper form for a minimum period of 6 years following the advice/service you receive from us, although your data could be held for a longer period where this may be needed to meet the requirements of our regulatory bodies.

## **Your data protection rights and choices in relation to your personal data - you can:**

- Right to be informed – Individuals have the right to be informed about the collection and use of their personal data - ask us to further explain how we use Your Personal Data
- The Right of access to your personal data - request copies of Your Personal Data that is under our control
- ask us to correct, delete or require us to restrict or stop using Your Personal Data (details as to the extent to which we can do this will be provided at the time of any such request)
- ask us to send an electronic copy of Your Personal Data to another organisation should you wish
- The right in relation to automated decision making and profiling – this allows individuals to object to their data being used in an automated individual decision-making process (making a decision solely by automated means without any human involvement) and profiling (automated processing of personal data to evaluate certain things about an individual). Profiling can be part of an automated decision-making process.

## **How to make contact with our Firm in relation to the use of Your Personal Data**

If you have any questions or comments about the way we are using your personal data, or wish to make contact in order to exercise any of your rights set out within this document please contact:

Philip Moore (Director) [pmoore@touchstonecommercial.co.uk](mailto:pmoore@touchstonecommercial.co.uk)

If we feel we have a legal right not to deal with your request, or to action it in a different way to how you have requested, we will inform you of this at the time.

You should also make contact with us as soon as possible on you becoming aware of any unauthorised disclosure of Your Personal Data, so that we may investigate and fulfil our own regulatory obligations.

If you have any concerns or complaints as to how we have handled Your Personal Data you may lodge a complaint with the UK's data protection regulator, the ICO, who can be contacted through their website at <https://ico.org.uk/global/contact-us/> or by writing to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.