

# TOUCHSTONE CORPORATE LIMITED

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## **Customer Privacy Notice**

For the purpose of this privacy notice the data controller of your personal information is Touchstone Corporate Limited.

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**

When we speak with you about your mortgage/finance and/or insurance requirements we do so on the basis that both parties are entering a contract for the supply of services.

In order to perform that contract, and to arrange the products you require, we have the right to use Your Personal Data for the purposes detailed below.

Alternatively, either in the course of initial discussions with you or when the contract between us has come to an end for whatever reason, we have the right to use Your Personal Data provided it is in our legitimate business interest to do so and your rights are not affected. For example, we may need to respond to requests from mortgage lenders, insurance providers and our Service Provider relating to the advice we have given to you, or to make contact with you to seek feedback on the service you received.

On occasion, we will use your personal data as part of our contractual responsibilities we may owe our regulator, The Financial Conduct Authority.

**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.

**How Long We Keep Your Data** – Your personal data will be retained by us electronically for a minimum of six years, or as long as the duration of this Firms relationship with you.

**Your rights in relation to your personal data** - you can:

- request copies of Your Personal Data that is under our control
- ask us to further explain how we use Your Personal Data
- 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

**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 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.

This privacy notice may be changed by us at any time. This Privacy Notice will be updated in due course to comply with the further requirements under the GDPR which comes into force on the 25<sup>th</sup> May 2018.