

Privacy Policy

Ghale Mortgages Limited

Ghale Mortgages Limited Registered Office: 50a Station Road, Aldershot GU11 1BG. Registered in England Number: 11582217

Ghale Mortgages Limited is an appointed representative of Openwork Limited which are authorised and regulated by the Financial Conduct Authority.

Ghale Mortgages Limited is known in this document as “Ghale Mortgages”, “we” and “us”

As the controller of your data, Ghale Mortgages complies with Data Protection laws in the United Kingdom and the EU General Data Protection Regulation (GDPR). This Privacy Policy details how Ghale Mortgages processes your personal data.

The personal data we collect about you

Personal data collected, used, stored and transferred by us may include:

- **Identity Data** including forenames, last name, maiden name, date of birth, gender, marital status, and username or similar identifier
- **Contact Data** including home address, email address and telephone numbers
- **Financial Data** including banks statements, payment card details, savings, debts such as loans and credit cards, income & expenditure, employer & pension benefits, and other assets
- **Special Category Data** specifically medical history
- **Transaction Data** including payments made for products and services you have purchased from us
- **Technical Data** including internet protocol (IP) address, 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 used to access the Ghale Mortgages website
- **Profile and Usage Data** including purchases made by you, feedback and survey responses, and how you use our website, products and services
- **Marketing and Communications Data** including your preferences in receiving marketing from us and our business partners and your communication preferences

How do we collect your personal data?

Personal data is collected by us using the following methods:

- **Direct interactions** with an adviser in person, by post, phone, email or otherwise when sourcing and applying for mortgage or protection products, processing Identity, Contact and Financial categories of personal data.
- **Automated technologies** or interactions with our website, by using the web enquiry form or the Find A Mortgage function, processing Identity, Contact, Financial and Technical categories of personal data.

- **Third parties** or publicly available sources (processing Identity, Contact and Financial categories of personal data) such as:
- **Estate agents** with whom you may be interacting, but only with your consent;
- **New home builders**, as a legitimate interest of the builder in order to assess affordability for the property;
- **Enquiries** you may perform on third-party mortgage sourcing websites.

How do we use your personal data?

We use your personal data in the following circumstances and relying on the following lawful basis for processing:

Purpose/Activity	Type of Data	Lawful Basis for Processing
To initially engage with you to discuss your requirements	<ul style="list-style-type: none"> • Identity • Contact 	Consent
To process and deliver your application for a mortgage or protection product	<ul style="list-style-type: none"> • Identity • Contact • Financial • Special Category • Transaction • Marketing & Comms 	Performance of a contract with you Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: <ul style="list-style-type: none"> • Notifying you about changes to our terms or privacy policy • Customer reviews/surveys • Re-engagement when existing products near expiry/review protection needs 	<ul style="list-style-type: none"> • Identity • Contact • Profile & Usage • Marketing & Comms 	Performance of a contract with you To comply with a legal obligation Necessary for our legitimate interests (to re-engage with you to review your existing mortgage/protection needs, and to maintain and improve customer service standards)
To respond to case enquiries and input to & defend against complaints	<ul style="list-style-type: none"> • Identity • Contact • Profile & Usage • Transaction 	To comply with a legal obligation Necessary for our legitimate interests (to ensure that complaints can be responded to accurately)

Purpose/Activity	Type of Data	Lawful Basis for Processing
	<ul style="list-style-type: none"> • Marketing & Comms 	
To perform an affordability check for a new build property	<ul style="list-style-type: none"> • Identity • Contact • Profile & Usage 	Consent
To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	<ul style="list-style-type: none"> • Identity • Contact • Technical 	To comply with a legal obligation Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	<ul style="list-style-type: none"> • Identity • Contact • Profile & Usage • Marketing & Comms • Technical 	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	<ul style="list-style-type: none"> • Technical • Profile & Usage 	Necessary for our legitimate interests (to analyse customer usage, update our website, to develop our business and to inform our marketing strategy)

Change of purpose

We will only use your personal data for the purposes stated above, unless we reasonably consider that we need to use it for another reason and it is compatible with the original purpose. Please contact us for an explanation as to how any new processing compatible with the original purpose.

If we need to use your personal data for an unrelated purpose, we will notify you and explain the legal basis which allows us to do so. Please note that we may process

your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Changes to our Privacy Notice

We keep our Privacy Notice under regular review and we will place any updates on this web page. This Privacy Notice was last updated on 16th October 2019. Historic versions can be obtained by contacting us.

Marketing communications

You will also have the choice to opt-in to receiving other related marketing information and related products and services.

You can opt-out of receiving these types of communications at any time by contacting our Compliance team at compliance@mab.org.uk or by clicking on the relevant link in email communications you receive from us.

However please note that your personal information will not be passed to any third-party organisation for marketing purposes.

Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We also limit access to your personal data to only those Ghale Mortgages staff, advisers, business partners and suppliers who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

Website Third-party links

Ghale Mortgages website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

Sharing of personal data outside of the European Economic Area

Some of our external suppliers are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA. Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US.

We may also use specific contracts approved by the European Commission that provide the same level of protection for personal data as it has in the EEA.

Who we disclose personal data to

Your personal data may be shared with third parties for the following purposes:

Type of Recipient	Reason
Within Ghale Mortgages	Depending on your requirements, it may be necessary to share your personal data with Ghale Mortgages's specialist product providers in order for suitably qualified advisers to source relevant products and services or to re-engage with existing clients.
Lenders and protection product suppliers	To source and submit applications in order to conclude the contract for the mortgage/protection application and the ongoing servicing of these contracts
External Suppliers	Specialist IT system providers to facilitate the sourcing of products, to provide continuing advice, to inform you about relevant products and services, and to request feedback on customer service standards. It may also be necessary to share your personal information with non-affiliated companies who perform support services on our behalf including those that provide professional, legal or accounting advice to Ghale Mortgages.
Estate Agents/new home builders	We may share information about the progress of your application with estate agents and home builders with whom you are interacting
Regulators	Sharing information may be necessary to fulfil our legal obligations as a regulated profession, for example with the Financial Conduct Authority, to verify your identity and comply with Anti Money Laundering legislation, and

Type of Recipient	Reason
	otherwise co-operate with law enforcement, legal proceedings or regulatory authorities.
Others	Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses, then the new owners may use your personal data in the same way as set out in this privacy notice.

These companies are required to ensure appropriate security measures are in place and maintain the confidentiality of your personal data, and to use your personal data only in the course of providing such services and in accordance with Ghale Mortgages instructions.

How long is your personal data retained?

We only retain your personal data for as long as necessary. The table below outlines how long data is retained, and depends on the reason the personal data is used for:

Purpose of processing	Retention
Enquiry date obtained from third parties (Estate Agents, websites) that do not result in an application for a mortgage or protection product	2 years from the date the enquiry was received from the introducer
Affordability assessments for new build property	2 years from Decision in Principle if affordability check does not proceed to a full mortgage application
Withdrawn, stalled, incomplete failed mortgage/protection applications	2 years from the date the latest application was started
Successful mortgage	25 years from the date the mortgage is purchased or 7 years from the date the latest protection product expires

Your legal rights regarding your personal data

After these retention periods if there is no other on-going client relationship your personal data will either be securely deleted or anonymised so that it can be used for statistical purposes but without any method of identifying you individually.

You have the right to:

- **Request access** to your personal data. This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data. This enables you to have any incomplete or inaccurate data corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete personal data where there is no good reason for us continuing to process it. You can also to ask us to delete your personal data where you have successfully objected to the processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to delete the data for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction** of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Questions

If you have any questions or complaints relating to how we use your personal data, or if you wish to exercise any of your rights regarding your personal data, please contact the Information Security & Data Protection Manager, Matt Lowndes, by emailing hello@ghalemortgages.co.uk or by writing to us. We will respond to you as soon as is possible. The length of time will depend on the type and complexity of the request, but you will receive a response no later than one month from the initial request.

What if I am still not satisfied?

If you are not satisfied with how Ghale Mortgages has responded to your enquiry, you have the right to complain to the Information Commissioner's Office (ICO), who is the regulator for data protection in the United Kingdom.