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## Mortgage & Money Management Ltd

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### Privacy Statement

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#### Who We Are

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Mortgage & Money Management 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 “Mortgage and Money Management”, “M&MM”, “we”, “us” or “our” we are referring to Mortgage & Money Management Ltd .

When we mention “contract”, we are referring to processing personal data in connection to applications we process on your behalf

Mortgage & Money Management Ltd is a company registered in England and Wales (company number 05808146) whose registered office is at CAMBRIDGE HOUSE, 16 HIGH STREET, SAFFRON WALDEN, ESSEX, ENGLAND. CB10 1AX. Our trading office is 25 Buntingford Road, Puckeridge, Hertfordshire, SG11 1RT. Mortgage & Money Management Ltd is authorised and regulated by the Financial Conduct Authority. Our Financial Services Register number is 452616.

You can find out more about us on our website at [www.mortgageandmoneymanagement.co.uk](http://www.mortgageandmoneymanagement.co.uk)

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#### The Personal Data We Collect And Use

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Mortgage and Money Management are an independent mortgage & insurance broker. This involves searching the whole of the mortgage and protection markets to ensure we find the right mortgage most relevant to your circumstances. To offer the best advice possible we may ask for details that may not be deemed directly relevant, however this information could potentially add value to the overall advice and recommendations we make. This information includes, but is not limited to:

- Name and address history
- Contact details – telephone numbers & email addresses
- Details of any dependents
- Details of current employment and history
- Details of secured & unsecured debt
- Other essential and non-essential monthly outgoings
- Credit history
- Other assets

How you answer these questions will determine what other questions we ask you because all lenders have different eligibility and affordability criteria. We will explain this process fully and ensure you understand why certain types of information may be relevant.

If you are providing information about another person, the other person must know that you are doing this and are content with their information being provided to us.

If a mortgage or insurance product is applied for through us, we will collect your direct debit details to pass on to your lender. In addition, some products recommended may include an upfront cost, such as a valuation fee, so we may ask for your payment information.

Mortgage lenders are data controllers in their own right and have their own privacy notices. However, lenders may automatically profile your information against their lending criteria and Credit Reference Agencies as soon as your information is forwarded to them, so this may affect your credit score. We will always bring this to your attention as part of the process. We will also make you aware in advance when lenders are likely to collect any fees from your accounts.

When arranging insurance for our customers, we will also collect 'sensitive' information about health and lifestyle as this is required by the insurance providers and allows us to ensure the right recommendations are made before an application.

If you are an existing customer of Mortgage & Money Management, we may use the information we already hold to research a new product, and we will always check that these details are accurate and up to date before any application is submitted.

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

Purpose/Activity	Lawful Basis for Processing
To initially engage with you to discuss your requirements.	To gain Consent
To process and deliver your application for a mortgage or protection product.	Performance of a contract with you Necessary for our legitimate interests (to ensure all applications are completed to an acceptable standard and to ensure any fees due to us are received).
To manage our relationship with you which will include: <ul style="list-style-type: none"> <li>• Notifying you about changes to our terms or privacy policy <ul style="list-style-type: none"> <li>• Customer reviews/surveys</li> </ul> </li> <li>• To contact you when existing products near expiry/review protection needs</li> </ul>	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 complaint handling	To comply with a legal obligation Necessary for our legitimate interests (to ensure that complaints can be responded to accurately)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences.	Necessary for our legitimate interests (to analyse customer usage, update our website, to develop our business and to inform our marketing strategy.

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## Who Your Personal Data Is Shared With

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In order to fulfil our contractual obligations, we'll share your personal data with the following third parties:

- Mortgage lenders
- Insurance providers
- General insurance providers
- Customer Relationship Management and Product Sourcing Systems (day to day processing of your data).
- Estate agents (if you were introduced to us by one of our estate agent partners)
- Lead suppliers (if you were introduced to us by a third party)
- Any recommended conveyancers where you wish to proceed with a quote.
- Will Writing providers where you wish to proceed with a quote

It may be necessary to share your personal data with the following data processors to fulfil our services and regulatory obligations:

- Iress via Acre Software to provide mortgage illustrations
- Assureweb via Acre Software to provide insurance comparisons
- Uinsure via Acre Software to provide an insurance quote
- Equifax via Acre Software to provide an Electronic ID check
- Mailchimp for marketing campaigns
- The Financial Conduct Authority (regulatory purposes);
- The Information Commissioner's Office (law enforcement);
- National Crime Agency (Law enforcement)
- Other law enforcement bodies (law enforcement);

Sharing information with these organisations allows us to better understand your needs.

- Online Advertising Platforms such as Facebook and Google

We may also disclose information to either the Financial Service Ombudsman or the Financial Conduct Authority where they request this to resolve complaints.

Occasionally, we may receive requests from third parties with authority to obtain disclosure of personal data, such as the police, regulatory bodies or legal advisers in connection with any alleged criminal offence, unlawful activity or suspected breach of the Terms of Use and or the breach of other terms and conditions or otherwise where required by law or where we suspect harm or potential harm to others. We will co-operate with any law enforcement authorities or court order requesting or directing us to disclose the identity or location of or any other information about anyone breaching any relevant terms and conditions or otherwise for the prevention or detection of crime or the apprehension or prosecution of offenders. We shall not be obliged to give you any further notice of this.

No data is transferred outside the EEA.

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## How We Store Your Data

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Your information is securely stored in electronic format using our customer relationship management system, Acre Software

Additionally, we also make use of market leading product sourcing technology provided by Iress, Ipipeline and AIR sourcing.

We keep the above personal information for as long as is necessary to fulfil our regulatory and legal responsibilities. This means that we will retain your information for as long as you are legally able to file a complaint or as long as we have a legal obligation to do so under Anti-Money Laundering legislation. We will then dispose your information by permanently deleting from our files.

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## Your Legal Rights Regarding Your Data

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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. 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 when this information was 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.

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## Keeping Your Data Secure

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We understand the importance of keeping your personal information secure. We use a variety of technologies and procedures to protect your private data from being accessed, used or disclosed in any way it shouldn't be. The security arrangements we've put in place include physical, organisational, and technological measures and controls. Together, they help to protect the personal information we hold from risks including loss, theft and unauthorised access.

We regularly review our policies and procedures to make sure they remain relevant.

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## How Long We Keep Your Personal Data

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To ensure that we are able to meet our legal, regulatory and customer obligations, we will retain client information for the following time periods:

- If you become a client of a lender/insurer as a result of the advice we provide to you, we will keep a full record of your interactions to enable us to meet our regulatory obligations, to evidence we gave suitable advice and to enable us to answer any complaints that may arise as a result of our advice. The Financial Conduct Authority lays down rules relating to how long information should be held for and we will keep your information to meet these requirements. We will not keep your information for longer than is necessary.

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## Marketing

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We may use your information to contact you about other products that may be of interest to you. We make sure that you are able to opt out of marketing communications at any time in a way that is convenient to you, including the method you used to contact us. Where we use online advertising platforms the data you supply to us will be matched by them to any profile they have of you.

We may contact you to conduct market research. We occasionally run promotions, competitions and prize draws but if we ask you for your contact details we will ensure these are not used for marketing unless you are happy to consent to that separately.

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## Cookie Policy

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We use cookies on our website. By using this website, you consent to the use of cookies.

Our Cookies Policy explains what cookies are, how we use cookies, how third-parties we may partner with may use cookies on the Service, your choices regarding cookies and further information about cookies.

What are cookies

- Cookies are small pieces of text sent by your web browser by a website you visit. A cookie file is stored in your web browser and allows the Service or a third-party to recognize you and make your next visit easier and the Service more useful to you.
- Cookies can be “persistent” or “session” cookies.

How we use cookies

- When you use and access our website, we may place a number of cookies files in your web browser.
- We use cookies for the following purposes: to enable certain functions of the website, to provide analytics and to store your preferences.
- We use both session and persistent cookies on the site

Third-party cookies

- In addition to our own cookies, we may also use various third-parties cookies to report usage statistics of the Website.

What are your choices regarding cookies

- If you'd like to delete cookies or instruct your web browser to delete or refuse cookies, please visit the help pages of your web browser.
- Please note, however, that if you delete cookies or refuse to accept them, you might not be able to use all of the features we offer, you may not be able to store your preferences, and some of our pages

might not display properly.

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## Changes To Privacy Statement

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We will undertake regular reviews of our Privacy Statement to ensure we continue to comply with our obligations to be transparent about how we use your personal information and that it is as concise, transparent, intelligible and as easily accessible as it can be.

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## Contact

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To exercise any of your rights detailed above you can contact us as detailed below:

In writing:

Mortgage & Money Management Ltd, 25 Buntingford Road, Puckeridge, Herts. SG11 1RT

Email: [dataprotection@mandmm.co.uk](mailto:dataprotection@mandmm.co.uk)

Call: 01920 821333

We take the privacy of your personal information very seriously. If you ever feel you need to complain about how we've handled your personal information and data you can contact us as follows:

In writing:

Mortgage & Money Management Ltd, 25 Buntingford Road, Puckeridge, Herts. SG11 1RT

Email: [complaints@mandmm.co.uk](mailto:complaints@mandmm.co.uk)

Call: 01920 821333

If you're still unhappy with any aspect of how we handle your personal information, you also have the right to contact the Information Commissioner's Office (ICO). The ICO is the UK's independent body set up to uphold information rights. You can contact it as follows:

Via its website: <https://ico.org.uk>

In writing:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

SK9 5AF

Call: 0303 123 1113