



PRIVACY POLICY

VERSION 1.5

Keystone Property Finance

42 Kings Hill Avenue, Kings Hill, West Malling, Kent ME19 4AJ

Contents

Keystone Property Finance	1
INTRODUCTION.....	3
WHY WE PROVIDE YOU WITH OUR PRIVACY NOTICE	3
OUR PRIVACY STATEMENT.....	3
HOW THE LAW PROTECTS YOU.....	3
WAYS WE MAY USE YOUR PERSONAL INFORMATION	4
OUR REASONS FOR WHEN WE MAY USE YOUR PERSONAL INFORMATION	4
OUR LEGITIMATE REASONS WHEN WE MAY USE YOUR PERSONAL INFORMATION	4
WHAT TYPE OF PERSONAL INFORMATION WE'LL GATHER	5
• Financial:	5
• Contact:	5
• Socio-demographic:	5
• Transactional:	5
• Contractual:	5
• Locational:	5
• Behavioural:.....	5
• Social Relationships:.....	5
• Open Data and Public Records:	5
• Communications:	5
• Technical:	5
• Usage Data:.....	5
• Documentary Data:	5
• National Identifier:	5
• Contact Preference:	5
SPECIAL TYPES OF DATA WE MAY GATHER.....	6
WHERE WE'LL GATHER PERSONAL INFORMATION	6
WHO WE'LL SHARE YOUR PERSONAL INFORMATION WITH.....	7
HOW WE'LL USE YOUR INFORMATION TO MAKE AUTOMATED DECISIONS TO APPROVE LENDING SERVICES.....	8
CREDIT REFERENCE AGENCIES (CRAs)	8
FRAUD PREVENTION AGENCIES (FPAs)	9
WHAT WE PROCESS AND SHARE WITH THE FPAs.....	9
AUTOMATED DECISIONS FOR FRAUD PREVENTION	10
CONSEQUENCES OF PROCESSING	10

DATA TRANSFERS	10
SENDING DATA OUTSLIDE OF THE EEA.....	10
YOUR RIGHTS	11
IF YOU CHOOSE NOT TO GIVE PERSONAL INFORMATION	11
MARKETING	11
HOW LONG WE KEEP YOUR PERSONAL INFORMATION	12
HOW TO GET A COPY OF YOUR PERSONAL INFORMATION.....	12
LETTING US KNOW IF YOUR PERSONAL INFORMATION IS INCORRECT	12
WHAT IF YOU WANT US TO STOP USING YOUR PERSONAL INFORMATION?	12
OPEN BANKING	13
HOW TO WITHDRAW YOUR CONSENT	15
HOW TO COMPLAIN.....	15
FUTURE FORMATS FOR SHARING DATA	15

INTRODUCTION

We are Keystone Property Finance Limited, a lender providing products and lending services for buy-to-let mortgages. We are registered in England and Wales (No.06262873) with our registered office address at 17 Kings Hill Avenue, Kings Hill, West Malling, ME19 4UA.

Our data controller can be contacted by phone on 0345 148 9086, or by email at compliance@keystonepropertyfinance.co.uk, or alternatively by post to Keystone Property Finance, 42 Kings Hill Avenue, Kings Hill, West Malling, Kent, ME19 4AJ.

WHY WE PROVIDE YOU WITH OUR PRIVACY NOTICE

Applicable Data Protection laws (including the General Data Protection Regulation and the Data Protection Act 2018), impose obligations on us as the data controller, when we collect or create, hold, amend, disclose, share or otherwise use or erase/destroy (collectively referred to as processing) your personal data and give you, as the data subject, rights over your personal data.

One such obligation is to process, (e.g. collect, hold, use or erase) your personal data fairly, lawfully and in a transparent manner.

This privacy notice meets that obligation by explaining what personal data we will hold about you, how we will process your personal data, why we process your personal data and the lawful grounds on which we are processing it. It also sets out some of your legal rights.

We may change this privacy notice in the future. If we make any substantial and/or material changes and those changes materially affect you, we will inform you of any changes before they take effect.

OUR PRIVACY STATEMENT

This privacy notice is to let you know how we promise to look after your personal information. This includes what you tell us about yourself, what we learn by having you as a customer, and the choices you give us about what marketing you want us to send you. This notice explains how we do this and tells you about your privacy rights and how the law protects you.

HOW THE LAW PROTECTS YOU

As well as our Privacy Promise, your privacy is protected by law. This section explains how it works.

Data Protection law says that we are allowed to use personal information only if we have a proper reason to do so. This includes sharing it outside Keystone Property Finance Limited.

The law says we must have one or more of these reasons:

- To fulfil a contract we have with you, or
- When it is our legal duty, or
- When it is in our legitimate interest, or
- When you consent to it.

A legitimate interest is when we have a business or commercial reason to use your information. But even then, it must not unfairly go against what is right and best for you. If we rely on our legitimate interest, we will tell you what that is.

WAYS WE MAY USE YOUR PERSONAL INFORMATION

This privacy notice is to let you know how we intend to look after your personal information, how we'll do this and informs you about your privacy rights and how the law protects you. This includes what you tell us about yourself, what we learn about you as our customer, and the choices you give us about what marketing you want us to send you. We'll use your personal information to list a few as shown below:

- To manage our relationship with you or your business.
- To develop new ways to provide service for our customers and to grow our business in an efficient and proper way.
- To develop and carry out marketing activities and to study how our customers use services from us and manage our brands and services.
- To manage how we work with other companies that provide services to us and our customers.
- To detect, investigate, report, and seek to prevent financial crime.
- To manage risk for us, our customers and any of our partnering businesses.
- To obey laws and regulations that apply to us.
- To respond to complaints and seek to resolve them.
- To exercise our rights set out in business agreements.

OUR REASONS FOR WHEN WE MAY USE YOUR PERSONAL INFORMATION

- Your consent.
- For fulfilling contracts and business agreements.
- Our legitimate interests, and
- Our legal duty

OUR LEGITIMATE REASONS WHEN WE MAY USE YOUR PERSONAL INFORMATION

- Keeping our records up to date, working out and, telling you how any of our services may interest you.
- Defining types of new products or services and inform you of it.
- Seeking your consent when we need it to contact you.
- Being efficient about how we fulfil our legal duties and contractual duties.
- Improving how we deal with financial crime and complying with our legal duties.
- Complying with regulations that apply to us.

WHAT TYPE OF PERSONAL INFORMATION WE'LL GATHER

- **Financial:**
 - Your financial position, status and history.
- **Contact:**
 - Where you live and how to contact you.
- **Socio-demographic:**
 - These are details about your work or profession, nationality, education and general income group.
- **Transactional:**
 - Details about fee payment to us for services provided.
- **Contractual:**
 - Details about the services we provide to you.
- **Locational:**
 - Data we get about where you are, such as may come from your mobile phone or the address where you connect a computer to the internet.
- **Behavioural:**
 - Details about how you use our services and website.
- **Social Relationships:**
 - About your associated relationships.
- **Open Data and Public Records:**
 - Details about you that are in public records such as the Electoral Register and information about you that is openly available on the internet.
- **Communications:**
 - What we learn about you from letters, emails, webchats and telephone conversations between us.
- **Technical:**
 - Details on the devices and technology you use.
- **Usage Data:**
 - Other data about how you use our products and services.
- **Documentary Data:**
 - Details about you such as passport, drivers licence, or birth certificate to name a few, that are stored in documents in different formats, or copies of them.
- **National Identifier:**
 - Your National Insurance number provided by the government to identify you.
- **Contact Preference:**
 - Any permissions, consents or preferences that you give us. This includes information about how you like us to contact you and your preference of the format we send documents out to you – such as preference for large font or communication only by post or email, or both.

SPECIAL TYPES OF DATA WE MAY GATHER

The law and other regulations treat some types of personal information as special. We will only collect and use these types of data if we are required for specific reasons and if the law allows us to do so:

- Racial or ethnic origin
- Religious or philosophical beliefs
- Trade union membership
- Genetic and bio-metric data
- Health data including gender
- Criminal convictions and offences

WHERE WE'LL GATHER PERSONAL INFORMATION

We may collect personal information about you (or your business) from these sources:

- Data you give to us:
 - When you apply for our services
 - When you talk to us on the phone or in branch
 - When you use our websites, mobile device apps, web chat or any other social media services
 - In emails and letters
 - In financial reviews and interviews
 - In customer surveys
 - If you take part in our competitions or promotions.
- Data we collect when you use our services:
 - Payment and transaction data.
 - Profile and usage data. This includes the profile you create to identify yourself when you connect to our internet, or mobile and telephone services. It also includes other data about how you use it. We gather this data from devices you use to connect to those services, such as computers and mobile phones, using cookies and other internet tracking software.
- Data from third parties we work with:
 - Companies that introduce you to us
 - Financial advisers
 - Card associations
 - Credit reference agencies
 - Insurers
 - Lenders
 - Social networks

- Fraud prevention agencies
- Land agents
- Public information sources such as Companies House
- Loyalty scheme operators
- Market researchers
- Agents working on our behalf
- Government and law enforcement agencies.

WHO WE'LL SHARE YOUR PERSONAL INFORMATION WITH

We may share your personal information within Keystone Property Finance Limited to provide our services and products including other organisations such as:

- Agents and advisers who we use to help run your accounts and services, collect what you owe, and explore new ways of doing business
- HM Revenue & Customs, regulators and other authorities
- UK Financial Services Compensation Scheme
- Credit reference agencies
- Fraud prevention agencies
- Companies we have a joint venture or agreement to co-operate with
- Organisations that introduce you to us
- Companies that we introduce you to
- Market researchers
- Companies you ask us to share your data with.

In addition to the above, we may need to share your personal information with other organisations to provide you with the product or service you have chosen:

- If you use direct debits, we will share your data with the Direct Debit scheme.
- If you apply for a mortgage through us, we may share information within Keystone Property Finance Limited and payment collection agencies.
- We may choose to sell, transfer, or merge parts of our business, or our assets. Or we may seek to acquire other businesses or merge with them.
- If the change to our business happens, then other parties may use your data in the same way as set out in this notice.
- During any such process, we may share your data with other parties. We'll only do this if they agree to keep your data safe and private.

HOW WE'LL USE YOUR INFORMATION TO MAKE AUTOMATED DECISIONS TO APPROVE LENDING SERVICES

We sometimes use systems to make automated decisions based on personal information we have – or are allowed to collect from others – about you or your business. This helps us to make sure our decisions are quick, fair, efficient and correct, based on what we know. These automated decisions can affect the products, services or features we may offer you, or the price that we charge you for them.

We'll use a credit scoring system to decide whether to lend money to you or your business, when you apply for mortgage lending. It uses past data to assess how you're likely to act while paying back any money you borrow. This includes data about similar accounts you may have had before and on data from your application form, credit reference agencies and data we may already hold. Credit scoring methods are tested regularly to make sure they are fair and unbiased.

You have rights in relation to automated decision making: if you want to know more please contact us using the details above.

- You can ask that we do not make our decision based on the automated score alone.
- You can object to an automated decision, and ask that a person reviews it.
- If you want to know more about these rights, please contact us on the above.

CREDIT REFERENCE AGENCIES (CRAs)

- We may carry out credit and identity checks when you apply for our services for you or your business. We may use Credit Reference Agencies to help us with this.
- We will share your personal information with CRAs and they will give us information about you. The data we exchange can include:
 - Name, address and date of birth
 - Credit application
 - Details of any shared credit
 - Financial situation and history
 - Public information, from sources such as the electoral register and Companies House.

We'll use this data to:

- Make sure what you've told us is true and correct
- Help detect and prevent financial crime

When we ask CRAs about you or your business, they will note it on your credit file. This is called a credit search. Other lenders may see this and we may see credit searches from other lenders.

If you apply for a product with someone else, we will link your records with theirs. We will do the same if you tell us you have a spouse, partner or civil partner – or that you are in business with other partners or directors.

You should tell them about this before you apply for a product or service. It is important that they know your records will be linked together, and that credit searches may be made on them.

CRAs will also link your records together. These links will stay on your files unless one of you asks the CRAs to break the link. You will normally need to give proof that you no longer have a financial link with each other.

You can find out more about the CRAs on their websites, in the Credit Reference Agency Information Notice. This includes details about:

- Who they are
- Their role as fraud prevention agencies
- The data they hold and how they use it
- How they share personal information
- How long they can keep data
- Your data protection rights.

Here are links to the information notice for each of the three main Credit Reference Agencies:

- [TransUnion](#) (previously known as CallCredit)
- [Equifax](#)
- [Experian](#)

FRAUD PREVENTION AGENCIES (FPAs)

Before we provide products, services or financing to you, we undertake checks for the purposes of preventing fraud and money laundering and to verify your identity. These checks require us to process personal data about you.

WHAT WE PROCESS AND SHARE WITH THE FPAs

The personal data you have provided, we have collected from you, or we have received from third parties will be used to prevent fraud and money laundering, and to verify your identity. This may include your:

- Name
- Date of birth
- Residential address and address history
- Contact details, such as email addresses and phone numbers
- Financial data
- Data relating to your or your businesses products or services
- Employment details
- Data that identifies computers or other devices you use to connect to the internet. This includes your Internet Protocol (IP) address.
- Vehicle details

When we and fraud prevention agencies process your personal data, we do so on the basis that we have a legitimate interest in preventing fraud and money laundering, and to verify identity, in order to protect our business and to comply with laws that apply to us. Such processing is also a contractual requirement of the services and financing you have requested.

We, and fraud prevention agencies, may also enable law enforcement agencies to access and use your personal data to detect, investigate and prevent crime.

Fraud prevention agencies can hold your personal data for different periods of time, and if you are considered to pose a fraud or money laundering risk, your data can be held for up to six years.

AUTOMATED DECISIONS FOR FRAUD PREVENTION

As part of the processing of your personal data, decisions may be made by automated means. This means we may automatically decide that you pose a fraud or money laundering risk if:

- Our processing reveals your behaviour to be consistent with that of known fraudsters or money launderers; or is inconsistent with your previous submissions; or
- You appear to have deliberately hidden your true identity.

You have rights in relation to automated decision making: if you want to know more please contact us using the details above.

CONSEQUENCES OF PROCESSING

If we, or a fraud prevention agency, determine that you pose a fraud or money laundering risk, we may refuse to provide the services and financing you have requested, or to employ you, or we may stop providing existing services to you.

A record of any fraud or money laundering risk will be retained by the fraud prevention agencies, and may result in others refusing to provide services, financing or employment to you. If you have any questions about this, please contact us on the details above.

DATA TRANSFERS

Whenever fraud prevention agencies transfer your personal data outside of the European Economic Area (EEA), they impose contractual obligations on the recipients of that data to protect your personal data to the standard required in the European Economic Area. They may also require the recipient to subscribe to 'international frameworks' intended to enable secure data sharing.

SENDING DATA OUTSIDE OF THE EEA

We will only send your data outside of the European Economic Area ('EEA') to:

- Comply with a legal duty.

We do not transfer information to our agents or advisers outside of the EEA, but if we do, we will make sure that it is protected in the same way as if it was being used in the EEA. We'll use one of these safeguards:

- Transfer it to a non-EEA country with privacy laws that give the same protection as the EEA. Learn more [on the European Commission Justice website](#).

- Put in place a contract with the recipient that means they must protect it to the same standards as the EEA. Read more about this here [on the European Commission Justice website](#),
- For data sent to the USA, transfer it only to organisations that are part of Privacy Shield. This is a framework that sets privacy standards for data sent between the US and EU countries. It makes sure those standards are similar to what is used within the EEA. You can find out more [about data protection on the European Commission Justice website](#).

YOUR RIGHTS

Your personal data is protected by legal rights, which include your rights to:

- Object to our processing of your personal data;
- Request that your personal data is erased or corrected;
- Request access to your personal data.

For more information or to exercise your data protection rights, please contact us using the contact details above.

You also have the right to complain to the Information Commissioner's Office (ICO) <https://ico.org.uk/concerns/>, which regulates the processing of personal data.

IF YOU CHOOSE NOT TO GIVE PERSONAL INFORMATION

We may need to collect personal information by law, or under the terms of a contract we have with you.

If you choose not to give us this personal information, it may delay or prevent us from meeting our obligations. It may also mean that we cannot perform services needed to process your applications, run your accounts or policies. It could mean that we cancel a product or service you have with us.

Any data collection that is optional would be made clear at the point of collection.

MARKETING

We may use your personal information to tell you about relevant products and offers. This is what we mean when we talk about 'marketing'.

The personal information we have for you is made up of what you tell us, and data we collect when you use our services, or from third parties we work with.

We study this to form a view on what we think you may want or need, or what may be of interest to you.

We can only use your personal information to send you marketing messages if we have either your consent or a 'legitimate interest'. That is when we have a business or commercial reason to use your information. It must not unfairly go against what is right and best for you.

You can ask us to stop sending you marketing messages by contacting us at any time.

We may ask you to confirm or update your choices, if you take out any new products or services with us in future. We will also ask you to do this if there are changes in the law, regulation, or the structure of our business.

If you change your mind you can update your choices at any time by contacting us.

HOW LONG WE KEEP YOUR PERSONAL INFORMATION

We will keep your personal information for as long as you are a customer of Keystone Property Finance Limited.

After you stop being a customer, we may keep your data for up to 7 years:

- To respond to any questions or complaints.
- To show that we treated you fairly.
- To maintain records according to rules that apply to us.

We may keep your data for longer than 7 years if we cannot delete it for legal, regulatory or technical reasons. We may also keep it for research or statistical purposes. If we do, we will make sure that your privacy is protected and only use it for those purposes.

HOW TO GET A COPY OF YOUR PERSONAL INFORMATION

You can access your personal information we hold by emailing us at compliance@keystonepropertyfinance.co.uk

Alternatively, you can write to us at our registered address:

Keystone Property Finance Limited , 42 Kings Hill Avenue, Kings Hill, West Malling, Kent, ME19 4AJ

LETTING US KNOW IF YOUR PERSONAL INFORMATION IS INCORRECT

You have the right to question any information we have about you that you think is wrong or incomplete. Please contact us if you want to do this.

If you do, we will take reasonable steps to check its accuracy and correct it.

WHAT IF YOU WANT US TO STOP USING YOUR PERSONAL INFORMATION?

You have the right to object to our use of your personal information, or to ask us to delete, remove, or stop using your personal information if there is no need for us to keep it. This is known as the 'right to object' and 'right to erasure', or the 'right to be forgotten'.

There may be legal or other official reasons why we need to keep or use your data. But please tell us if you think that we should not be using it.

We may sometimes be able to restrict the use of your data. This means that it can only be used for certain things, such as legal claims or to exercise legal rights. In this situation, we would not use or share your information in other ways while it is restricted.

You can ask us to restrict the use of your personal information if:

- It is not accurate.
- It has been used unlawfully but you don't want us to delete it.
- It not relevant any more, but you want us to keep it for use in legal claims.
- You have already asked us to stop using your data but you are waiting for us to tell you if we are allowed to keep on using it.

If you want to object to how we use your data, or ask us to delete it or restrict how we use it, please contact us.

OPEN BANKING

This section of our Privacy Policy relates to Open Banking and should be read in conjunction with the other clauses in our Privacy Policy. In the event of conflict with any other clauses, this clause shall prevail.

What is Open Banking?

Open Banking is the secure way of providing access to your bank or building society account to providers who are registered for this purpose.

Registered providers and participating banks and building societies are listed under the Open Banking Directory.

Open Banking was set up by the UK Government to encourage more competition and innovation in the financial services sector.

As a forward thinking lender, we support the use of Open Banking as it allows us to process loan applications efficiently, securely and in our consumer's best interests.

By permitting access to your bank or building society account information we are able to make a better lending decision as we shall be able to verify your income, outgoings and other matters in order to assess what loan terms would be suitable for you based upon what you can reasonably afford to repay.

Further information about Open Banking is available from www.openbanking.org.uk.

How will my personal data be shared and used for the purposes of Open Banking?

By proceeding with your loan application via our website you expressly consent to us sharing your personal, contact and loan application details ("the Shared Personal Data") with our registered Open Banking partner, Perfect Data Solutions Limited ("PDS") who are also a credit reference agency. During your loan application we shall safely and securely direct you to PDS's secure portal ("the Portal") for the purposes of granting PDS access to your bank or building society account information ("Transaction Information"). As soon as your Transaction Information is received it shall be reported back to us in the form of a completed search in order that we may continue to process your loan application ("the Permitted Purpose").

Further information about PDS including their registered provider and regulatory status is available from www.lendingmetrics.com.

Is Open Banking secure?

PDS are registered under the Open Banking Directory as an account information service provider and are also regulated by the Financial Conduct Authority as a payment services firm under number 802599. Any data you submit via the Portal will be encrypted and its usage tracked as part of set Open Banking data security standards.

We are responsible for the secure transmission of any Shared Personal Data to PDS, for safely directing you to the Portal and for the safe receipt and usage of your Transaction Information.

You will not be required to share your banking password or log in details with either us or PDS. Once you have given your explicit consent to share your bank account information on the Portal you will be directed to your own bank or building society's login page where you will enter in your own login details directly.

We are not responsible for your direct data transmissions with PDS or with your own bank or building society.

How will my Shared Personal Data and Transaction Information be used?

PDS shall, subject to their own terms and conditions and privacy policy, and, if your bank or building society is registered to provide access under the Open Banking Directory, obtain your Transaction Information and submit this back to us for the Permitted Purpose. By way of example, the Transaction Information that we shall receive is likely to include information relating to your income, outgoings and credit worthiness.

PDS shall be entitled to re-access your Transaction Information for up to 90 days from the date of your original search result in order to refresh the search results, obtain a snapshot of your data or gather additional data.

PDS shall hold the Shared Personal Data and the Transaction Information they receive and retain according to their own terms and conditions and privacy policy, available on the Portal, which you will be required to read and consent to once directed to their website.

As PDS are also a credit reference agency they may also share and keep a record of your Shared Personal Data and Transaction Information.

Will you use my Transaction Information data for any other purpose?

The Transaction Information we receive about you will only be used for the Permitted Purpose. We do not sell or share Transaction Information with any third party.

The information contained in the rest of this Privacy Policy deals with how we collate, use, transfer, store, delete and other terms applicable to your personal data including Shared Personal Data and Transaction Information.

Do I have to provide you with my consent to proceed?

Where your bank or building society have already permitted access to your Transaction Information you shall need to contact them directly in order to withdraw your consent under their particular Open Banking terms and conditions.

Are any of my other rights under this Privacy Policy affected?

Your individual data protection and privacy rights including the right to access, correct, delete, object, restrict, withdraw consent, request transfer and / or make a complaint, continue to apply to relevant personal data we control or process and are dealt with elsewhere in this Privacy Policy.

Under Open Banking as your personal data is shared by your bank or building society and accessed by PDS you may also be able to exercise your individual data protection and privacy rights against either of them pursuant to their own terms and conditions and privacy policies.

HOW TO WITHDRAW YOUR CONSENT

You can withdraw your consent at any time. Please contact us if you want to do so.

If you withdraw your consent, we may not be able to provide certain products or services to you. If this is so, we will tell you.

HOW TO COMPLAIN

Please let us know if you are unhappy with how we have used your personal information. You can contact us by phone, email or, post.



0345 148 9086



compliance@keystonepropertyfinance.co.uk



Keystone Property Finance, 42 Kings Hill Avenue, Kings Hill
West Malling, Kent ME19 4AJ

You also have the right to complain to the Information Commissioner's Office. Find out on their website how to [report a concern](#).

FUTURE FORMATS FOR SHARING DATA

The Data Privacy laws changed on 25 May 2018. From this date you will have the right to get your personal information from us in a format that can be easily re-used. You can also ask us to pass on your personal information in this format to other organisations.

We are working with our industry to improve the way your data is shared. We'll update this notice if required with more details.