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## Privacy Policy

Registered in England and Wales No. 06262873

Registered Office: 42 Kings Hill Avenue Kings Hill, West Malling, Kent, ME19 4AJ

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# 1 Introduction

- 1.1 Keystone Property Finance Limited (KPF) provides mortgages to Buy to Let (BTL) landlords, who are borrowing primarily for business purposes.
- 1.2 This Privacy Policy sets out how we obtain, use and protect your personal information. The company is known as the 'Data Controller', which means that we decide the purpose and means of the processing.
- 1.3 In the course of considering your application for finance and managing your mortgage account with us, we ask for a range of personal data. This helps us to correctly assess and come to a decision about your application and ensures we meet the various obligations imposed on lenders by law. We make every effort to keep the information we hold about you accurate and up to date throughout your relationship with us.
- 1.4 The Policy applies mainly to our applicants and customers, but it also covers other parties associated with them who may provide information to us, such as directors, shareholders and family members gifting funds. In addition, it is applicable to mortgage brokers and those using our website.

# 2 How we obtain your personal information

- 2.1 Your mortgage broker will be your initial point of contact with us. Your broker will be registered with us and will make you aware of this Privacy Policy at an early stage. They will provide us with the majority of the information we need to process your application. They will obtain your agreement to share your personal information with us.
- 2.2 If you provide information to your broker, including bank statements and identification documents, to be shared with us before a formal full mortgage application has been made in your name, we will use this information to help us provide an initial assessment of the merits of your application to your broker. If your application proceeds, this information may be added to it.
- 2.3 Once your application has been submitted to us, we will obtain information from third party sources, including, but not limited to:
  - credit reference agencies;
  - fraud reference agencies;
  - HMRC;
  - HM Land Registry;
  - Companies House;
  - local authorities;
  - surveyors/valuers;as well as open source information on the internet.

### 3 The type of information we collect

3.1 We collect the following information to support your application and our ongoing relationship with you as our customer. We receive most of this information through your broker, but some data will come from searches with third parties such as credit reference agencies. As part of your application, your broker will obtain your agreement to these searches at an early stage and draw your attention to this Policy.

3.2 Types of information collected (this list is not exhaustive):

**Personal details** - your name, (including any previous names), address (including previous addresses), date of birth

**Contact details** – your land and mobile telephone number

**Proofs of address** – this may include utility bills

**Photographic ID** – a passport may be required and may be checked electronically.

**Financial** – bank account details, bank statements, pay slips, and credit file information

**Employment** – your employer’s name and address and your length of employment

**Associates** – details about directors, joint applicants and beneficial owners, who are connected to you or your company or LLP. Where you supply information about associates, you confirm that they are aware of how their information will be used as set out in this Privacy Policy

**Associated Businesses** – limited company and other corporate structures that you own, are director or shareholder of, or have been in the past, or where you are a Person of Significant Control (PSC)

**Portfolio information** – the details of your current Buy to Let portfolio

**Criminal Convictions/Offences** – details of convictions including their dates – certain convictions may mean we are unable to lend to you.

**Cookies** – some limited statistics regarding the use of our website.

### 4 How we use your information and the legal bases for this

4.1 We want to be clear about how we use, or process, your personal information and the lawful bases, or grounds, that we have for doing so. We rely on four main lawful bases:

**-Contractual Necessity**

We need to process your personal information in order to set up an application for you. This is done at your request, prior to entering into a contract if your application is successful. Once you have entered into a contract with us, we will fulfil our obligations in the contract throughout the term of our relationship with you as well as our responsibilities to you as a customer.

**-Legitimate Interest**

The law allows us to use your personal information to further our legitimate interests as a mortgage lender, as long as these do not conflict with your own interests or fundamental rights and freedoms.

**-Legal Obligation**

We are obliged by law to process certain personal information in specific ways depending on the situation. We may also become subject to court orders or law enforcement agency instructions at certain times.

**-Consent**

Lastly, when you tell us information that is deemed 'special category', such as health conditions you may suffer from, or personal circumstances that might impact your ability to manage your account with us, we will need to ask you for your specific consent to record and process this data.

This is so that our customer contact staff can be aware of particular background or requirements you may have, and of what we can do to make it easier for you to deal with us. You may withdraw this consent later at any time.

4.2 We list the main types of processing we undertake and the lawful bases that apply to each below:

<b>Processing</b>	<b>Lawful basis/bases</b>
Assess new applications for mortgage finance	-contractual necessity -legitimate interest -legal obligation
Confirm and verify identity of persons in all interactions	-contractual necessity -legitimate interest -legal obligation
Obtain accurate valuations of properties for lending purposes	-contractual necessity -legitimate interest
Assess applications to renew or extend mortgage finance for our existing customers	-contractual necessity -legitimate interest -legal obligation
Assess financial standing of Directors of a limited company borrower, shareholders and giftors	-contractual necessity -legitimate interest -legal obligation
Manage our relationship with our customers	-contractual necessity -legitimate interest
Advise/update about changes to products, services, facilities, contact details, mortgage conditions, incidents	-contractual necessity -legitimate interest

Prevent fraud and money laundering, including enquires about source of deposit or mortgage overpayments.	-contractual necessity -legitimate interest -legal obligation
Check and verify instructions that we receive from our customers	-contractual necessity -legitimate interest
As obliged by law in connection with any suspicious activity	-legal obligation
Advise of fixed rate term expiry, Standard Variable Interest rate (SVR)	-contractual necessity -legitimate interest
Assist our customers where they get into financial difficulty	-legitimate interest
Update credit reference agencies with payment performance data on a regular basis	-contractual necessity -legitimate interest
Investigate and respond to complaints	-contractual necessity -legitimate interest
Monitor telephone calls to help improve standards and resolve disputes	-legitimate interest
Analyse complaints in order to address root causes, including system issues, staff training, document wording	-legitimate interest
Where directed to do so by a court	-legal obligation
To provide accessibility and reasonable adjustments where required	-legitimate interest -legal obligation
With third parties for account management purposes	-contractual necessity -legitimate interest
Where required to manage contentious legal matters and disputes	-contractual necessity -legitimate interest -legal obligation
Trace customers with whom we have lost contact	-legitimate interest
Recover debts and enforce other conditions	-legitimate interest
Request that breaches of Mortgage Conditions be rectified	-contractual necessity -legitimate interest
Analysis as part of management information, control of risk and decision making, including review by external auditors	-legitimate interest
Assess quality and accuracy of processing in order to maintain staff performance standards and compliance with processes and policies	-legitimate interest
Confirm payment details when making refunds	-legitimate interest
Maintain our systems, databases and controls	-legitimate interest
Protect our legal rights and interests	-legitimate interest
Manage transfer of accounts/assets to other owners - where relevant	-legitimate interest

<b>Sensitive Information Processing</b>	
Information regarding your health, medical conditions, or personal circumstances that may make it more difficult for you to manage your account with us, either temporarily or in the longer term.	-consent

## 5 How we share your information and with whom

- 5.1 We will share your information with a number of third parties in order to meet our obligations as a lender under current UK law, particularly in regard to the prevention of financial crime, including money laundering and fraud.
- 5.2 We rely on our panel solicitor firms, detailed on our website, to represent us in your conveyancing transaction and will allocate your case to one of these firms, normally when we are ready to offer. Where you appoint your own solicitor, we will pass information to them. (Please note: if you are borrowing through a limited company/Special Purpose Vehicle (SPV)/Limited Liability Partnership (LLP), we must be represented by one of our panel firms. Please check our website for further details.)
- 5.3 We may share your information with the following parties or organisations (this list is not exhaustive):
- your broker and other advisers, e.g. accountants or tax advisors
  - credit reference agencies (See Section 6 for further details)
  - fraud prevention agencies (See Section 7 for further details)
  - organisations providing screening services in connection with sanctions and PEPs (Politically Exposed Persons)
  - electronic identification providers
  - valuers
  - solicitors acting on your case
  - fellow directors, shareholders
  - guarantors
  - third party service providers who help maintain your accounts with us
  - card associations
  - the Direct Debit Scheme
  - payment processors (e.g. BACS)
  - field agents employed by us to confirm compliance with our mortgage conditions or carry out other instructions on our behalf
  - local authorities in connection with any property licensing requirements
  - insurance companies
  - repossession agents
  - auction houses
  - third parties that you have authorised to act on your behalf regarding your account(s) with us
  - law enforcement agencies

- Government authorities or bodies, such as HMRC and to search the Insolvency Register
- any company to who we may assign or transfer our rights and obligations relating to your account in the future
- external auditors of our business

5.4 We do not share your information with any other party for marketing purposes.

## 6 Credit Reference Agencies (CRAs)

6.1 We provide certain personal data to CRAs when you apply to us, and receive the results from them in the form of a credit file report. Our request is recorded as a 'search', and each search is noted on your credit file. We may also conduct subsequent checks with the CRAs during our relationship with you.

These searches enable us to:

- confirm your identity
- assess creditworthiness and your ability to afford financial products
- view financial information from other lenders, utility suppliers and telecoms businesses
- check information you have already supplied to us, such as address history
- understanding your financial links and associations
- keep your personal information up to date
- help prevent fraud and money laundering
- make decisions about how to help you should you fall into financial difficulty

6.2 When you apply for a mortgage with someone else, the CRAs will link your records with theirs when we make searches. These parties will be known as 'financial associates'.

You should tell these other parties about this before you apply in joint names for finance with us.

This link will remain until you or your associate successfully applies to the CRAs for a 'Disassociation' to break it. You can check for any financial associations by contacting the CRAs for a copy of your credit file. Details about how to do this can be found in the Credit Reference Agency Information Notice for the relevant CRA, contact details can be found in 6.4.

6.3 We provide a monthly update on the status of any mortgage account(s) you hold with us to Experian. This information forms part of your credit file and will be visible to other financial organisations with whom you have a relationship.



- 6.4 There are three main Credit Reference Agencies in the UK. They are authorised and regulated by the Financial Conduct Authority (FCA) to conduct business as CRAs. While we deal only with Experian at the time of writing, we provide the contact details of all three below, and a link to their respective Credit Reference Agency Information Notice (CRAIN).

The CRAIN provides comprehensive information about their role, how they obtain personal data, what they use it for, and how you can contact them.

CRA	Contact Details
Equifax Limited	Post: Equifax Limited, Customer Service Centre PO Box 10036, Leicester, LE3 4FS Web address: <a href="https://www.equifax.co.uk/Contact-us/Contact_Us_Personal_Solutions">https://www.equifax.co.uk/Contact-us/Contact_Us_Personal_Solutions</a> Email: <a href="mailto:UKDPO@equifax.com">UKDPO@equifax.com</a> Phone: 0333 321 4043 or 0800 014 2955  CRAIN: <a href="https://www.equifax.co.uk/privacy-hub/crain">https://www.equifax.co.uk/privacy-hub/crain</a>
Experian Limited	Post: Experian, PO BOX 9000, Nottingham, NG80 7WP Web address: <a href="https://www.experian.co.uk/consumer/">https://www.experian.co.uk/consumer/</a> Phone: 0344 481 0800 or 0800 013 8888  CRAIN: <a href="#">CRAIN</a>
TransUnion International UK Limited	Post: TransUnion, One Park Lane, Leeds, West Yorkshire, LS3 1EP Web address: <a href="https://www.transunion.co.uk/consumer/consumer-enquiries">https://www.transunion.co.uk/consumer/consumer-enquiries</a> Email: <a href="mailto:consumer@transunion.co.uk">consumer@transunion.co.uk</a> Phone: <a href="tel:03300247574">0330 024 7574</a>  CRAIN: <a href="https://www.transunion.co.uk/legal/privacy-centre/pc-credit-reference">https://www.transunion.co.uk/legal/privacy-centre/pc-credit-reference</a>

## 7 Fraud Prevention Agencies

- 7.1 Fraud Prevention Agencies (FPA)s exist to help prevent fraud and money laundering.
- 7.2 Before we provide mortgage finance 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.
- 7.3 The personal data you have provided via your mortgage broker, we have collected from you, or that we have received from third parties, will be used to prevent fraud and money laundering, and to verify your identity.
- 7.4 The personal information that will be processed includes, for example: name, address, date of birth, contact details, financial information, employment details and device identifiers.

- 7.5 We and fraud prevention agencies may also enable law enforcement agencies to access and use your personal data to detect, investigate and prevent crime.
- 7.6 We process your personal data 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 or financing you have requested.
- 7.7 If you provide false or inaccurate information and fraud is suspected, we may pass your details to FPAs. These organisations may allow law enforcement agencies and other firms such as financial institutions, to access the data they hold.
- 7.8 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.
- 7.9 **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 lending facilities or services to you, or we may stop providing existing services to you.
- 7.10 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 using the details in Section 16 of this Policy.
- 7.11 **Data Transfers** - Fraud prevention agencies may allow the transfer of your personal data outside of the UK. This may be to a country where the UK Government has decided that your data will be protected to UK Standards, but if the transfer is to another type of country, then the fraud prevention agencies will ensure your data continues to be protected by establishing appropriate safeguards are in place.
- 7.12 **Your Rights** – You have legal rights in relation to your personal data, 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.
- 7.13 For more information or to exercise your data protection rights, please contact us. Our contact details can be found in Section 16. You can ask us for the names and contact details of the fraud prevention agencies that we share information with.
- 7.14 You also have a right to complain to the Information Commissioner’s Office, which regulates the processing of personal data. Their details are provided later in this Policy in Section 16.

## 8 Sharing data outside the UK

- 8.1 We may pass information outside the UK, but only when the person or organisation we are sending the data to has robust rules to protect the data or we have an appropriate contract in place.
- 8.2 We will take all reasonable steps to ensure your personal data is kept securely.
- 8.3 Fraud prevention agencies may allow the transfer of your personal data outside of the UK. This may be to a country where the UK Government has decided that your data will be protected to UK standards, but if the transfer is to another type of country, then the fraud prevention agencies will ensure your data continues to be protected by ensuring appropriate safeguards are in place.

## 9 Other parties connected to our applicants/customers

- 9.1 If you are linked/associated with one of our applicants or customers, we may conduct searches and enquiries as part of our due diligence and lending assessment.
- 9.2 Specifically, we will obtain information on **directors** and **shareholders** and **beneficial owners** of a limited company or SPV applying for a mortgage with us. Your consent will be obtained through the application process itself; a shareholder consent form; or an additional director form, whichever is appropriate.
- 9.3 We also make enquiries where you are a **family member gifting money** for, or towards, a deposit for a mortgage. Your consent will be obtained on a Deed of Gift form.
- 9.4 If one of our customers asks you to act on their behalf on certain matters relating to their mortgage, we ask that a **third party** mandate is completed and signed, which will include your name, address and contact details.
- 9.5 Where you are acting for our customer if they have passed away, we will verify your identity and make checks to satisfy ourselves that you are the **relevant person** to handle their affairs.

## 10 Looking after your personal information

- 10.1 We use a range of the latest safeguards to protect your data, including constant monitoring of our database.
- 10.2 If we are unable to identify you, we may ask you to contact us in an alternative way or use other ways to confirm your identity. This is to prevent data being inadvertently disclosed to unauthorised third parties.

## **11 Call Monitoring and Recording**

11.1 We may monitor and record our telephone calls with you to:

- maintain and improve our communication standards;
- train and develop our staff;
- investigate complaints and disputes;
- help prevent and detect fraud;
- ensure compliance with our obligations under security of card data.

11.2 We create, store and access recordings under strict controls in order to meet these objectives.

## **12 Communication**

12.1 We rely on our extensive network of mortgage brokers, who are regulated by the Financial Conduct Authority (FCA), to help you choose the right mortgage for you. Our advertisements are intended for professional mortgage brokers only. Our website and documentation carry notices to this effect.

12.2 If you take out a mortgage with us, we will from time to time contact you to keep you informed about relevant dates and options that may apply to you while you are with us.

This may include:

- advising you when your fixed interest rate is due to expire and revert to our Standard Variable Rate (SVR), or;
- letting you know that you may be eligible to increase your borrowing with us.

12.3 We are obliged to let you know about these and other features and aspects of your mortgage so that you can manage your account with us effectively and achieve your financial objectives.

## **13 How long data is retained for**

13.1 In accordance with Data Protection principles, we consider how long we keep the different types of personal data we hold, taking into account the various reasons for which it is needed.

13.2 We may keep records for up to six years after our relationship with you ends, in order to meet our legal obligations and demonstrate that we have discharged our responsibilities correctly.

13.3 In certain exceptional circumstances we may keep data for longer, for example: where we have been directed to retain it by a court, or where a law enforcement organisation or regulator is undertaking an investigation.

- 13.4 Credit reference agencies and 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.
- 13.5 Where we have no further need to retain personal information, we will permanently and securely delete or anonymise it.

## 14 Your rights

- 14.1 By law you have a number of rights in connection with your personal data. A brief description of the rights you have is given below. If you want to know more, or exercise your rights under data protection law, you can contact our Data Protection Officer. Please see Section 16 for contact details.

- 14.2 Your rights under Data Protection law:

**Right to be informed** - you are entitled to know how we collect, use, store and delete your personal information.

**Right to access** – You can ask for a copy of the personal information we hold about you. This is normally known as a Data Subject Access Request (DSAR).

**Right to rectification** – if you believe the data we hold is inaccurate, you can ask us to correct it for you.

**Right to erasure** – under certain circumstances you can request that we delete your data. This right is sometimes known as the ‘right to be forgotten’. Please note that sometimes we are obliged to refuse requests to erase data, due to the other overriding obligations and requirements placed on us.

**Right to restriction of processing** – you can ask us to restrict the processing of your personal information where you believe that:

- any of the information we hold about you is inaccurate
- we no longer need to process your information for the original purposes
- we are not using your information in a lawful manner

**Right to portability** – this right allows you to obtain and reuse your personal data easily from one IT environment to another in a safe and secure way. Certain conditions apply to this right.

**Right to object** – in certain circumstances you can object to your personal data being processed. For instance, you have the right to prevent your information being used for direct marketing purposes.

**Rights related to automated decision making including profiling** – this is the right not to be subject to a decision based solely on automated processing.

## 15 Cookies

- 15.1 We use cookies and similar technologies on our website. Cookies are small files placed on your device that allow website servers to recognise you when you revisit the site, and to tailor your browsing experience to your specific needs and interests.
- 15.2 We use cookies to help us understand how our site is used, improve the user experience and measure how our advertising campaigns are received.
- 15.3 You can opt out of accepting cookies on our website, by using the dialogue box presented to you when you access it for a new session.

## 16 Contact us

- 16.1 You can contact our **Data Protection Officer** for further details about how we obtain use and protect your personal data, and to exercise your rights under data protection law.

Email	<a href="mailto:Compliance@keystonepropertyfinance.co.uk">Compliance@keystonepropertyfinance.co.uk</a>
Telephone	0345 350 3696 ( 08.30 to 17.30 Mon to Fri)
Post	The Data Protection Officer Keystone Property Finance Limited 42 Kings Hill Avenue Kings Hill West Malling ME19 4AJ

- 16.2 If you are unhappy with the way that we have handled your data, or you believe that there has been a data breach, or have any other complaint regarding our service, please contact our **Complaints Officer** on the following details (please note the email addresses are similar):

Email	<a href="mailto:Complaints@keystonepropertyfinance.co.uk">Complaints@keystonepropertyfinance.co.uk</a>
Telephone	01732 756051 ( 08.30 to 17.30 Mon to Fri)
Post	The Complaints Officer Keystone Property Finance Limited 42 Kings Hill Avenue Kings Hill West Malling ME19 4AJ

16.3 Should you remain unhappy after contacting us to complain about a data protection matter or concern around your personal information, you can complain to the Information Commissioner's Office (ICO) which is the UK's supervisory authority for data protection.

16.4 The ICO contact details are below:

Website	<a href="https://ico.org.uk/global/contact-us/">https://ico.org.uk/global/contact-us/</a>
Helpline	0303 123 1113
Post	Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

## 17 Changes to this Privacy Policy

17.1 We keep this Policy under regular review to ensure that it remains up to date.

17.2 From time to time we may make changes to the way we process personal data or to the purposes we use it for. Where appropriate, such as changes for which you would reasonably expect us to give you notice, we will contact you to let you know beforehand.