

## Our Privacy Notice

### Introduction

All Money Matters Limited is a specialist mortgage packager who provides services to FCA regulated intermediaries in the UK. TFC and TFC Homeloans are trading styles of All Money Matters Limited.

All Money Matters Limited (company number 08580309) whose registered office is at Palladium House, 1-4 Argyll Street, London, W1F 7LD (“we”, “us” or “our”) is committed to protecting and respecting your privacy.

All Money Matters Limited is the data controller in respect of your personal data. You can contact us by e-mailing us here: waynesmethurst@allmoneymatters.co.uk or writing to us at TFC Homeloans, Second Floor, Boulton House, 17-21 Chorlton Street, Manchester, M1 3HY.

Data protection officer: Wayne Smethurst

### Why should you read this document?

During the course of dealing with us, we will ask you to provide us with detailed personal information relating to you or your clients existing circumstances including financial situations and credit history.

This document is important as it allows us to explain to you what we will need to do with the personal data collected, and the various rights you have in relation to Your Personal Data.

It provides you with details about the types of personal data that we collect from you, how we use that personal data and the rights you have to control our use of the personal data.

### Information we collect

We may collect and process the following personal data from your use of 1APP (your “information”):

- Information you give us: This is information you submit to us via 1APP, corresponding with us by phone, e-mail or otherwise and when you report a problem with the 1APP site. If you contact us, we will keep a record of that correspondence. The information you give to us may include your name, username, job title, company name, FCA number, company e-mail address and phone number.
- Information we collect about you: We may collect the following information:
  - technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
  - information about your use of 1APP, including information about records you create on the site (including the date and time records are created and the number of active records);
  - clients personal information pertaining to a mortgage loan/enquiry. This may include reviewing assets and liabilities, bank accounts, identity verification checks, credit checks, preventing and detecting fraud, money laundering or other crimes and any other requirements in accordance with rules set by the Financial Conduct Authority (FCA) or other applicable legislation.

We need your name, e-mail address and company contact details in order to provide you with access to 1APP, otherwise we will not be able to set you up as a user on the site.

### **How we use your information**

The purposes for which we use your information and the legal basis under data protection law on which we rely to do this are as follows:

- It is necessary for our legitimate interests or that of a third party. This includes:
  - authentication of users accessing 1APP;
  - using your e-mail address to send you activity messages;
  - using your contact details in order to respond to any enquiries that you submit through 1APP and to engage in further communications with you about your enquiry;
  - to develop, operate, deliver and improve our site and content, for administration and for internal operations, including troubleshooting, data analysis and testing;
  - anonymising activity data and sharing this with you or your organisation for product performance analysis and using it to provide us with activity insight statistics which will help us improve our service;
  - contacting you to ask you to participate in customer satisfaction surveys and market research (by e-mail or phone) and to undertake and analyse those surveys and research.
  
- You have given us your consent to use it to contact you about our products and services. You can withdraw your consent at any time by contacting us on the details provided above or, for marketing communications, by following the unsubscribe instructions set out in the relevant communication.
  
- It is necessary for compliance with a legal obligation. This includes when you exercise your legal rights under data protection law, for the establishment and defence of our legal rights and for compliance with legal and regulatory responsibilities that apply to us.

### **Data anonymisation and aggregated data**

Your information will be anonymised and converted into statistical or aggregated data in such a way as to ensure that you are not identified or identifiable from it. Aggregated data cannot be linked back to you as a natural person. It will be used to conduct research and analysis, including to produce statistical research and reports.

### **Disclosure to and use of your Information by Third Parties**

We may disclose your information to the following third parties:

- financial services providers that we work with may receive anonymised or aggregated activity data for product performance analysis and review;
- our third-party service providers, agents, subcontractors and other organisations for the purposes of providing services to us or directly to you on our behalf. Such third parties may include cloud service providers (such as hosting and email management), IT maintenance providers, advertising agencies and administrative service providers. When we use third party service providers, we only disclose to them any personal information that is necessary for

them to provide their service and we have a contract in place that requires them to keep your information secure and not to use it other than in accordance with our specific instructions;

- any third party who is restructuring, selling or acquiring some or all of our business or assets or otherwise in the event of a merger, re-organisation or similar event or in the event that we sell any business or assets, in which case we will disclose your information to the prospective buyer of such business or assets;
- if we are under a duty to disclose or share your information in order to comply with any legal or regulatory obligation or request.

### **Where we store your Information**

All information you provide to us is stored on our secure servers which are located within EU.

If at any time we transfer your information to, or store it in, countries located outside of the EEA (for example, if our hosting services provider changes) we will ensure that appropriate safeguards are in place for that transfer and storage as required by applicable law. This is because some countries outside of the EEA do not have adequate data protection laws equivalent to those in the EEA.

### **Security**

The transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to 1APP and any transmission is at your own risk. Once we have received any data, we will use strict procedures and security features to try to prevent unauthorised access.

Where we have given (or where you have chosen) a password which enables you to access the 1APP, you are responsible for keeping this password confidential. We advise you not to share your password with anyone.

### **Your rights**

Under data protection law, you have rights in respect of the personal data relating to you. You have the right:

- to be informed about the processing of your personal data (this is what this statement sets out to do);
- to have your personal data corrected if it's inaccurate and to have incomplete information completed – please note that you can update your details at any time by logging into your account;
- to object to processing of your personal data where we rely on legitimate interests to process it (see above);
- to restrict processing of your personal data in certain circumstances including where you contest the accuracy of it, you have objected to it and we are assessing whether we can continue processing it for our legitimate interest or we no longer need your information but you ask us to keep it to establish, exercise or defend a legal claim;
- to have your personal data erased in certain circumstances including where it is no longer necessary for our purposes, you withdraw your consent or you object to the processing and we have no overriding legitimate interest to continue using it;
- to withdraw your consent to our processing of your personal data where we've relied on your consent;

- to request access to your personal data and information about how we process it;
- to move, copy or transfer your personal data in certain circumstances and where feasible; and
- rights relating to automated decision making, including profiling.

The way we process your information and the legal basis on which we rely to process it will affect the extent to which these rights apply. If you would like to discuss or exercise any of these rights, please contact us using the details provided above.

You have the right to lodge a complaint with the Information Commissioner's Office where your information has or is being used in a way that you believe does not comply with data protection laws. We encourage you to contact us before making any complaint and we will seek to resolve any issues or concerns you may have.

### **Payment of application fees by client**

We do not store information about your clients' debit or credit card or other means of payment. We will forward a link from Barclays to enable payment of the TFC Homelands packager fee and, if applicable, the valuation fee. It is your responsibility to advise your client/s and ensure payment is made, as per our terms and conditions of business).

### **Use of information we collect through automated systems when you visit our website**

#### **Cookies**

Cookies are small text files that are placed on your computer's hard drive by your web browser when you visit any website. They allow information gathered on one web page to be stored until it is needed for use on another, allowing a website to provide you with a personalised experience and the website owner with statistics about how you use the website so that it can be improved.

Some cookies may last for a defined period of time, such as one day or until you close your browser. Others last indefinitely.

Your web browser should allow you to delete any you choose. It also should allow you to prevent or limit their use.

Our website uses cookies. They are placed by software that operates on our servers, and by software operated by third parties whose services we use.

When you first visit our website, we ask you whether you wish us to use cookies. If you choose not to accept them, we shall not use them for your visit except to record that you have not consented to their use for any other purpose.

If choose not to use cookies or you prevent their use through your browser settings, you will not be able to use all the functionality of our website.

We use cookies in the following ways:

- to track how you use our website;
- to record whether you have seen specific messages we display on our website;
- to keep you signed in our site;

- to record your answers to surveys and questionnaires on our site while you complete them;
- to record the conversation thread during a live chat with our support team.

Personal identifiers from your browsing activity:

Requests by your web browser to our servers for web pages and other content on our website are recorded.

We record information such as your geographical location, your Internet service provider and your IP address. We also record information about the software you are using to browse our website, such as the type of computer or device and the screen resolution.

We use this information in aggregate to assess the popularity of the webpages on our website and how we perform in providing content to you.

If combined with other information we know about you from previous visits, the data possibly could be used to identify you personally, even if you are not signed in to our website.

#### **Retention period for personal data.**

Except as otherwise mentioned in this privacy notice, we keep your personal information only for as long as required by us:

- to provide you with the services you have requested;
- to comply with FCA Regulation, other law, including for the period demanded by our tax authorities;
- to support a claim or defence in court.

#### **Changes to this Privacy Policy**

We may review this policy from time to time and any changes will be notified to you by posting an updated version on this site and/or by contacting you by email. Any changes will take effect seven days after the date on which we post the modified terms on this site or the date of our email, whichever is the earlier.

We recommend you regularly check for changes and review this policy whenever you visit the site. If you do not agree with any aspect of the updated policy you must immediately notify us and cease using this site and accessing your user account.