

Bluestone Mortgages Ltd

Privacy Policy

Bluestone takes privacy very seriously. It is very important to us to maintain the confidentiality of any personal details or other information you may provide us with. This Policy sets out what sort of information we collect and hold about you, how that information is collected, how we use your information and how information may be corrected and/or updated.

Use of your personal data

This Privacy Policy is issued by Bluestone Mortgages Ltd of 1st Floor, Melbourne House, 44-46 Aldwych, London WC2B 4LL ("**Bluestone**", "**we**", "**us**").

Bluestone is the controller of this personal data. Should you have any questions regarding the use of your personal information, we can be contacted by calling 0800 368 1833 or by writing to Privacy, 1st Floor, Melbourne House, 44-46 Aldwych, London WC2B 4LL.

Personal Data that we Collect from You and Other Sources

Bluestone will collect and process personal data relating to you, from you in connection with your application for a mortgage (an "**Application**") or mortgage loan agreement that we may enter into with you (a "**Mortgage**"). We may also process such data in relation to any guarantor of, or joint applicant for the loan.

In the processing of your Application and the administration of your account, we may also collect personal data relating to you from other sources, including:

- Credit reference agencies ("**CRAs**") and fraud prevention agencies ("**FPAs**");
- Bluestone Group records;
- archives of publicly held information such as the Electoral Register and registers of court judgments;
- your current and previous lenders, employers, landlords, accountant and, bankers;
- the Land Registry
- HM Revenue and Customs; and
- any intermediary or solicitor instructed by you in relation to the Application.

This personal data may include:

- name, address, contact details, email address, telephone numbers;
- date of birth, and if relevant, residency, citizenship, nationality, and any information about your health and any vulnerability;
- financial details, including your income and expenditure, savings, borrowings and debts
- employment record;
- marital status and details of your dependents;
- your transactional history;
- nature of occupier status (eg whether you are a tenant or owner occupier) and address history;
- information from CRAs and FPAs.

We may also make a credit search with CRAs, which will record details of that search whether or not your Application is successful. Each search will be registered on your credit file(s) individually, and a number of searches within a short period may impact on your ability to obtain credit. If the Application is made in joint names and we search the files of a CRA, an **“association”** will be created with the other person(s) named in the Application. We or other lenders may take this association into account in future applications for credit or financial services. The association will remain between you until one of you successfully applies for **“disassociation”** with the credit reference agencies. Information held about you by credit reference agencies may be linked to records relating to other persons. Your Application will be assessed with reference to any **“associated”** records.

Purposes of Processing and Legal Basis

We may use that data to:

- verify your identity;
- make credit decisions relating to you;
- ensure any offer, which is made to you is appropriate to your circumstances;
- administer your account;
- trace you, and enforce, or allow forbearance in relation to a Mortgage with you;
- comply with our obligations to regulators;
- generate and analyse statistics to assist us in running our business;
- assist FPAs to prevent money laundering and financial crime and CRAs and to facilitate responsible lending;
- to consider and deal with any complaints you may have or any other problems which may arise in relation to your Mortgage;
- send you promotional and marketing materials in relation to products or services that we think may be of interest to you, subject to any preferences that you express when we collect your contact details or subsequently. You can opt out of receiving promotional and marketing materials from us at any time by writing to us at Privacy, First Floor, Melbourne House, 44-46 Aldwych, London, WC2B 4LL.
- establish, exercise or defend legal claims; or
- or for any other purpose for which you provide us with your personal information.

We may also process such data in relation to any guarantor of, or joint applicant for, the Mortgage.

We may check the validity of any identification document you provide to prove your identity with the issuing authority of that document.

The legal bases on which we collect, process and transfer your information in the manner described above are:

- that this is necessary for the performance of our Mortgage with you or in order to take steps at your request prior to entering into a contract;
- that this is necessary for the purposes of our legitimate interests in conducting our business in a responsible and commercially prudent manner. We will not process your personal data for these purposes if to do so would constitute an unwarranted interference with your own interests, rights and freedoms; and
- that this is necessary for compliance with a legal or regulatory obligation that applies to us.

The legal bases on which we collect, process and transfer special categories of data relating to you in the manner described above are:

- that you have given your explicit consent to such processing.

Recipients of Data

In connection with the above purposes, we may disclose your personal data to other organisations, including:

- CRAs and FPAs - we may periodically submit information to these agencies throughout the term of your Mortgage. If you do not repay money owed to us on time and in full, we may inform CRAs who will record the outstanding debt, and this may impact on your ability to obtain credit.
- any intermediary assisting you with your Application
- other Bluestone group companies,
- our regulators,
- any company providing insurance or other products in connection with the Mortgage,
- third parties which provide services to us in connection with the Mortgage;
- your guarantors, and any adult occupiers of the property;
- our guarantors, investors, or funders and any entity proposing to do so;
- actual or proposed assignees of our rights against you;
- any party with whom we or our agents have, or are considering entering into, a contractual agreement in relation to the mortgage;
- any receiver, and any party who it may be necessary to inform in connection with any contemplated litigation against you;
- professionals employed in relation to the mortgage documents, or as advisors to persons referred to above.

Direct Marketing

If you have expressly agreed to us contacting you, or sharing your Information with third parties, for the purpose of conducting confidential market research or sending you details of products or services that we think may be of interest to you, we may also pass your information to such third party suppliers for these purposes. You will have the right at any time to stop us from contacting you, or giving your details to others, for these purposes. You can write us at Privacy, First Floor, Melbourne House, 44-46 Aldwych, London, WC2B 4LL if you wish it to stop.

Retention

We will not hold your data for longer than is necessary. We will retain and hold your personal data, and all details and documents relating to your loan, for up to twelve years after the date on which either your loan is repaid, or your Application does not proceed, or the date of expiry of an Agreement with you, or for such period of time thereafter as is necessary to comply with our legal and regulatory obligations.

Transfers Abroad

In connection with the above we might transfer your personal data outside the United Kingdom and outside the European Economic Area, including to a jurisdiction which is not recognised by the European Commission as providing for an equivalent level of protection for personal data as is provided for in the European Union. If and to the extent that we do so, we will ensure that appropriate measures are in place to comply with our obligations under applicable law governing such transfers. These may include entering into a contract governing the transfer that contains the 'standard contractual clauses' approved for this purpose by the European Commission. If you would like to receive further details of the measures that we have taken in this regard, we can be contacted by calling 800 368 1833 or by writing to Privacy, First Floor, Melbourne House, 44-46 Aldwych, London, WC2B 4LL.

Requirement to Provide Data

You are not under a statutory or contractual duty to provide us with any personal data. However, there are some pieces of information that you must provide to us so that we can process your Application. If you do not provide us with this information, we may not be able to process your Application or enter into a Mortgage with you.

Automated Decision Making

As part of the processing of your personal information, decisions may be made by automated means, e.g. we may use credit scoring methods or other automated decision making systems to assess your credit status. 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.

Your Rights

You have the following rights, in certain circumstances and subject to certain restrictions, in relation to your personal data:

- **Right to access the data** – You have the right to request a copy of the personal data that we hold about you, together with other information about our processing of that personal data.
- **Right to rectification** – You have the right to request that any inaccurate data that is held about you is corrected, or if we have incomplete information you may request that we update the information such that it is complete.
- **Right to erasure** – You have the right to request us to delete personal data that we hold about you. This is sometimes referred to as the right to be forgotten.
- **Right to restriction of processing or to object to processing** – You have the right to request that we no longer process your personal data for particular purposes, or to object to our processing of your personal data for particular purposes.
- **Right to data portability** – You have the right to request us to provide you, or a third party, with a copy of your personal data in a structured, commonly used machine readable format.

If you wish to exercise any of the rights set out above, we can be contacted by calling 0800 368 1834 or by writing to Privacy, Bluestone Mortgages Limited, First Floor, Melbourne House, 44-46 Aldwych, London, WC2B 4LL.

Please telephone us on 0800 368 1833 if you want to have details of the CRAs and FPAs from whom we obtain and to whom we pass information about you.

A copy of the Experian Credit Reference Agency Information Notice (CRAIN) can be found here: <http://www.experian.co.uk/crain/index.html>

Complaints

If you have any queries or complaints in connection with the processing of your personal data, please contact us by phone at the customer service number 0800 368 1834 or by email at complaints@bluestone.co.uk, or in writing to our contact address:

Privacy,

Bluestone Mortgages Limited,

First Floor, Melbourne House,

44-46 Aldwych

London

WC2B 4LL

You also have a right to complain to the Information Commissioner's Office if you are not happy with the way we have used your information or addressed your rights. Details of how to lodge a complaint can be found at (<https://ico.org.uk/make-a-complaint/>), or you can call the Information Commissioner's Office on 0303 123 1113.