

# Mortgage Intelligence Holdings - Authorisation Privacy Notice (Appointed Representative)

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# 1. Mortgage Intelligence Holdings Ltd (MIH) Authorisation Privacy Notice (AR)

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The MIH privacy notice provides information on how MIH, any of its subsidiaries, and any related 3<sup>rd</sup> party providers collect, use, secure, transfer and share your information. Your information is being collected and processed by Mortgage Intelligence Holdings Ltd and will be used primarily for undertaking our regulatory responsibility for assessing the suitability of your application to become an Appointed Representative of the Network. All information provided and obtained will be processed in accordance with the General Data Protection Regulation.

MIH has its head office at:

Roddis House  
12 Old Christchurch Road  
Bournemouth  
Dorset  
BH1 1LG

## 1.1. Types of Information Collected.

MIH will typically collect but not limited to:

First Name	Middle Name	Surname	Previous Name/Marriage Certificate/Deed Poll
Date of Birth	Present Address	Residential status	Credit Card statements
Landlord Details	Nationality	NI Number	Personal debt details
Photographic ID	Address Verification	Bank Statements	Solicitor details
Self Employed/Ltd Co Accounts	Employer Name/address	Personal/secured loan details	Accountant details
Personal expenditure	Employer phone number	Phone numbers	Bank details
Criminal offences /convictions	Directorship details	Qualifications	Assets/liabilities details
Previous employer details	Email address	Previous addresses	Data Protection Licence details
Personal business conduct	Partner/spouse details	Visa details	Certificate of Incorporation

## 1.2. Methods of Collection

In order to meet their regulatory responsibilities in respect of authorisation and ongoing fitness and propriety, MIH collects via their Appointed Representatives and prospective Appointed Representatives, information relevant to their finances and background from:

- yourself
- Business associates
- Employers
- "Trusted" sources including:
  - Government / Land / Police registers
  - Credit / Default Agencies
  - Financial Institutions (Banks, Building Societies, Loan Agencies, Credit Card companies)
  - Insurance Companies
  - Law firms
  - Accountants
  - Through consent to third parties disclosing information about you to us that they have collected

Such information will generally be collected directly via the use of any of our standard forms, face to face, over the internet, via email, or through a telephone conversation with you. We may also collect personal information through our affiliates or suppliers.

In addition, you may choose to submit information directly to us via several methods, including:

- through MIH and affiliates websites
- in response to marketing or other communications
- through social media
- by signing up for a MIH product or service
- through participation in an offer, program or promotion
- in connection with an actual or potential business or employment relationship with us

You may also agree to third parties disclosing information about you to us that those third parties have collected.

We, our service providers and partners collect certain information by using automated means, such as cookies and web beacons, when you interact with our advertisements, mobile applications, or visit our websites, pages or other digital assets. The information we collect in this manner may include: IP address, browser type, operating system, referring URLs and information on actions taken or interaction with our digital assets.

We may use third-party web analytics services on our websites and mobile apps. The analytics providers that administer these services use technologies such as cookies and web beacons to help us analyse how visitors use our websites and apps.

"Your Rights and Choices" section of this Privacy Notice specifies your ability to limit the usage of the information collected.

### 1.3. Purposes of Collection

Generally, we will collect, use and hold your information for the purposes of:

- Assessing applications for the purpose of joining the Network
- Undertaking our regulatory responsibility for the ongoing fitness and propriety of our Appointed Representatives
- Conducting business, developing relationships with business partners
- Dealing with lenders and providers to assist in providing customers with a product or service
- Processing payments / transactions including: Accounting, Authorisation, Auditing, Billing, Reconciliation, Collection, Complaints, Enquiries, Credit Checks and related dispute resolution activities
- Protecting against and preventing fraud, unauthorised transactions, money laundering, tax evasion, claims, other liabilities and managing risk exposure and agent /franchise quality, integrity, compliance and security of business processes
- Creating and managing any accounts, associated authentication criteria (IDs and passwords) you may have with MIH and third parties
- Provide, administer and communicate with you about MIH services, offers, programs and promotions, their issuers, acquirers, retailers and partners
- Compile business directories, including business contact information
- Operating, monitoring, evaluating and improving our products, services, websites, mobile applications, other digital assets and business:
  - Developing new products and services
  - Managing communications, assessing effectiveness and optimising advertising
  - Functionality of our websites, mobile applications and other digital assets
- Enforcing MIH "Terms of Use", other legal rights as may be required by applicable laws and regulations or requested by any judicial process or governmental agency having or claiming jurisdiction over MIH or its affiliates.
- Complying with industry standards and MIH policies

### 1.4. Lawful basis of processing

MIH processes your information under the following basis:

Mortgage Intelligence Holdings – Authorisation Privacy Notice (AR) (Version 1.0)

- Performance of a contract: where you enter into a contract with MIH and we need to process your information as part of this contract
- Legitimate interests: some information is processed by MIH as part of its legitimate interests which include fraud, risk assessment, due diligence, network and information security, suppressions and managing opting out of communications, profiling, direct marketing, monitoring, web analytics, cloud storage, acquisitions, updating customer details, and core products and services provided by the data controller
- Public interest: some information is processed in accordance with public interest
- Consent: where we process information under consent we will seek your clear and unambiguous consent prior to processing your data

## 1.5. Information We Share

We do not sell or otherwise disclose personal information we collect about you, except as described in this Privacy Notice or as indicated via a consent process at the time the data is collected. We share the information we collect with, but not limited to:

- Vetted affiliates / Financial Institutions / Insurance Companies / Mortgage Companies for business facilitation to provide required services
- Vetted affiliates for the purpose of conducting consumer research
- Formally contracted service providers to perform services on our behalf:
- Hosting Datacentres, Infrastructure, Applications (Development / Support) , Cloud Services (Software as a Service – SaaS, Platform as a Service – PaaS , Infrastructure as a Service – IaaS)
- Helpdesk, Call Centres etc.  
We contractually require these service providers to safeguard the privacy and security of personal information they process on our behalf and authorise them to use or disclose the information only as necessary to perform services on our behalf or comply with legal requirements
- Law firms
- Auditors
- Our parent companies (Countrywide Group Plc. and associated companies)
- Credit agencies, Land Registry Office, Her Majesty's Revenue and Customs (HMRC), Financial Conduct Authority (FCA) and other relevant regulatory bodies
- Additionally we may share information about you, if required legally, to prevent harm or financial / reputation loss, for investigation of suspected or actual fraudulent or illegal activities
- Prospective employers requesting references

On website features can be accessed where we partner with other entities that are not affiliated with MIH. These include social networking, geo-location tools etc. are operated by third parties (indicated appropriately) who may use or share personal information in accordance with their own privacy policies. It is recommended that you review the third parties' privacy policies if you use the relevant features.

MIH reserve the right to transfer your information in the event of a sale or transfer (wholly or partially) of our business or assets, with reasonable efforts for the acquirer to protect / use your information consistent with our Global Privacy Notice. You can exercise your rights to contact the acquiring entity with questions concerning the protection and processing of your information.

## 1.6. How long do we keep information for

We will keep information for a reasonable amount of time in order to perform the purposes listed above.

We only keep your information for as long as necessary. We generally keep personal information for 7 years after last contact with you. However MIH reserves the right to keep information for longer if we feel that this is in the legitimate interests of MIH.

## 1.7. International Data Transfers

MIH may transfer the personal information collected about you to recipients in countries other than the country in which the information was originally collected. Those countries may not have the same data protection laws as

Mortgage Intelligence Holdings – Authorisation Privacy Notice (AR) (Version 1.0)

the country in which you initially provided the information. When we transfer your information to other countries, we will protect that information as described in this Privacy Notice or as otherwise disclosed to you at the time the data is collected (e.g. via program specific privacy notice).

### 1.8. Profiling

For the purposes of business conduct, enhancement, identification of fraud, money laundering and other potential unauthorised activities, MIH may engage in profiling activities via direct use or anonymisation of sensitive personal information.

### 1.9. Direct Profiling

Direct profiling is engaged for the fair and lawful purposes, to provide MIH the ability to enforce MIH "Terms of Use", legal reporting as may be required by applicable laws, regulations, policies / standards or requested by any judicial process or governmental agency having or claiming jurisdiction over MIH or its affiliates; including, but not limited to:

- Benchmarking performance, disciplinary actions, improvement plans and awards
- Financial Viability analysis / reports
- Anti-money laundering
- Tax reporting
- Credit defaulting / exposure

### 1.10. Indirect Profiling

Indirect profiling via anonymisation of personal information is also used for preparing and furnishing aggregated data reports showing anonymised information, including, but not limited to, the following:

- Compilations, analyses, analytical and predictive models and rules, and other aggregated reports for the purpose of advising our partners / affiliates and servicing institutions, retailers and other customers regarding past and potential future patterns of service usage, spending, fraud, and other insights that may be extracted from this data
- Compiling and communicating promotional and marketing information about products and services that MIH, affiliates and other organisations that we have affiliations with have and that may be of interest to you
- Conducting market research
- Facilitating our internal business operations, including the fulfilment of any legal requirements

### 1.11. Your Rights and Choices

Your rights regarding the sensitive / personal information we maintain about you enable you to exercise choices about what personal information we collect from you, how we use that information, and how we communicate with you.

### 1.12. Access and Correction

You may have the right to:

- obtain confirmation that we hold personal information about you
- request access to and receive information about the personal information we maintain about you
- receive copies of the personal information we maintain about you

The right to access personal information may be limited in some circumstances by local law requirements. To exercise these rights, please see details below of requirements:

#### 1.13.1 Update and correct inaccuracies in your personal information

If you feel that the information we hold about you is incorrect or inaccurate you can contact us outlining the information you feel is incorrect or inaccurate.

If we refuse to correct your personal information, we will provide you with a written notice that sets out the reasons for our refusal (unless it would be unreasonable to provide those reasons) and provide you with a statement regarding the mechanisms available to you to make a complaint. We will provide you with access to information we hold about you.

### 1.13.2 Object to the processing of your personal information

If you would like to object to any processing of your information by MIH you can contact us outlining what processing of information you would like to object to.

### 1.13.3 Have the information blocked, anonymised or deleted.

If you would like MIH to delete, block or anonymise information we hold about you, you can contact us outlining what information you would like deleted, blocked or anonymised.

To update your preferences, ask us to remove your information from our mailing lists or submit a request to access, update, correct or delete your personal information, please contact us as specified in the “How To Contact Us” section below.

## 1.14. Opting out of processing

You can opt out of collection of personal information by automated means e.g. when visiting our website or visiting third-party websites and interacting with our adverts, by using the Cookie Consent tool displayed in the website (the browser you use may provide options on how to opt out of receiving certain types of cookies). However, without cookies you may not be able to use all of the website features and/or online services. Where websites require a login, cookies will be required and you will therefore be accepting the use of cookies.

Some of our service providers and partners may collect information about your online activities over time and across third-party websites to customise and target our adverts.

You can at any time tell us not to send you marketing communications by:

- e-mail [privacy@experiencemi.co.uk](mailto:privacy@experiencemi.co.uk)
- unsubscribing via the “unsubscribe link” within the marketing e-mails you receive from us, or
- contacting MIH as indicated below

## 1.15. Withdrawal of consent

If we obtain your information by consent you have the right to withdraw any consent you previously provided to us.

If we process your information under legitimate interest you can object at any time on legitimate grounds, to the processing of your personal information.

**MIH will apply your preferences going forward.** Doing so will mean that you cannot take advantage of certain MIH and affiliate products, services and promotions.

The right to consent removal may be limited in some circumstances by local law requirements and you will be informed appropriately.

## 1.16 How to Contact Us / Complaints and Feedback

If you:

- believe we fall short of your expectations in processing your personal information
- wish to make a complaint about a breach of your personal information, applicable privacy laws / principles or have a concern about MIH privacy practices
- would like access and/or update information or preferences you provided to us,

Please e-mail us at: [privacy@experiencemi.co.uk](mailto:privacy@experiencemi.co.uk)

Or write to us at:

Roddis House  
12 Old Christchurch Road  
Bournemouth  
Dorset  
BH1 1LG

To assist us in responding to your request, please give full details of the issue. We attempt to review and respond to all complaints within a reasonable time.

If we cannot for lawful reasons complete your request we will explain this to you to the extent that we lawfully can.

### 1.17 How We Protect Personal Information

The security of your personal information is very important and MIH is committed to protecting the information we collect. We maintain administrative, technical and physical safeguards designed to protect the personal information you provide or we collect against accidental, unlawful or unauthorised destruction, loss, alteration, access, disclosure or use.

We use SSL encryption on a number of our websites from which we transfer certain personal information.

MIH stores personal information only for as long as it is necessary for the fulfilment of the purpose for which the personal information was collected, unless otherwise required or authorised by applicable law. We take measures to destroy or permanently de-identify personal information if required by law or if the personal information is no longer required for the purpose for which we collected it.

### 1.18 Review and Updates

This privacy notice may be updated from time to time and you should review it on a regular basis.