INDEPENDENT LENDING The Old Bank 997 Abbeydale Road Millhouses Sheffield S7 2QE



Bespoke Financial Solutions

t 03333 448878 e <u>admin@independentlending.co.uk</u> www.independentlending.co.uk

Independent Lending Privacy Notice

Who we are

Independent Lending are a trading style of Vitty Alexander Financial Services Ltd which are Commercial Finance Brokers based at The Old Bank, 997 Abbeydale Road, Millhouses, Sheffield, S7 2QE.

Vitty Alexander Financial Services Ltd Trading as Independent Lending is authorised and regulated by the Financial Conduct Authority (FCA) for advising on and arranging residential mortgages. Commercial Finance is where the borrower is acting by way of business and is not regulated by the FCA. Our registered and trading address is The Old Bank, 997 Abbeydale Road, Millhouses, Sheffield, S7 2QE.

What data do we collect?

Our Company collects the following data:

- Personal identification information (Name, email address, phone number, gender, nationality, civil/marital status, etc.) and documents that are necessary to verify your identity
- Company financial and trading information
- Bank account details, tax information, loans and credit commitments, personal and company credit history, sources of income and expenditure, family circumstances and details of dependents
- Health status and history, details of treatment and prognosis, medical reports (further details are provided below specifically with regard to the processing we may undertake in relation to this type of information)
- Any pre-existing mortgage/finance and/or insurance products and the terms and conditions relating to these

How do we collect your data?

You directly provide Our Company with most of the data we collect. We collect data and process data when you:

- Register online or other communication methods for our services.
- Voluntarily complete a customer survey or provide feedback on any of our message boards or via email.
- Use or view our website via your browser's cookies.

Our Company may also receive your data indirectly from the following sources:

- We may also obtain some information from third parties, for example, credit checks, information from your employer, and searches of information in the public domain such as the voters roll and Companies House.
- Software that is able to verify your credit status. We will only do this if we have consent from you for us or our nominated processor to access your information in this manner.
- With regards to electronic ID checks we would not require your consent but will inform you of how such software operates and the purpose for which it is used.

Special Category Data

In the course of your interactions with **Independent Lending** you may share information that is classified as 'Special Category Data'. This could include data about:

- Race
- Ethnic origin
- Politics
- Religion
- Trade union membership
- Genetics
- Biometrics
- Health
- Sex life
- Sexual orientation

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Registered Address: The Old Bank, 997 Abbeydale Road, Millhouses, Sheffield, S7 2QE. Registration Number: 5479920



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Where you do share information relating to any of these categories e.g., when you may share information about your health or a characteristic of vulnerability **Independent Lending** will always seek explicit consent from you to store and process such information.

How will we use your data?

Our Company collects your data so that we can:

- Process your application and manage your request.
- Email you with special offers on other products and services we think you might like.
- To monitor the performance of our products and services to ensure consumer outcomes are being achieved
- Responding to any queries you may have in relation to any mortgage/finance product or insurance policy you may take out, or to inform you of any developments in relation to those products and/or polices of which we might become aware.

Data Type	Data use
Personal identifiable information	Part of due diligence process and referral to
	appropriate product provider.
Company financial and trading information	Part of due diligence process and referral to
	appropriate product provider.
Bank account details, tax information, loans and	Part of due diligence process and referral to
credit commitments, personal and company	appropriate product provider.
credit history, sources of income and	
expenditure, family circumstances and details of	
dependents	
Financial Info (Inc Products)	Part of due diligence process and referral to
	appropriate product provider.
Bank information	Part of due diligence process and referral to
	appropriate product provider.
Special category data	Part of due diligence process and referral to
	appropriate product provider.
Contact information	To contact you about our services or products.

Lawful Basis for Processing Data

Data Type	Lawful Basis for Processing
Personal identifiable information	Contract
Company financial and trading information	Contract
Bank account details, tax information, loans and credit commitments, personal and company credit history, sources of income and expenditure, family circumstances and details of dependents	Contract
Financial Info (Inc Products)	Contract
Bank information	Contract
Special category data	Contract
Contact information	Contract

If you agree, Our Company will share your data with our partner companies so that they may offer you their products and services.

- Mortgage lenders / Finance lenders / Insurance providers
- Third parties who we believe will be able to assist us with your enquiry or application, or who are able to support your needs as identified. These third parties will include but may not be limited to, our compliance advisers, product specialists, estate agents, providers of legal services such as estate planners, conveyancing, surveyors and valuers (in each case where we believe this to be required due to your particular circumstances).
- We do not share your data for marketing purposes.



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When Our Company processes your data, it may send your data to, and also use the resulting information from, credit reference agencies to prevent fraudulent purchases.

Credit Reference Agency Information Notice (CRAIN)

Independent Lending may share your personally identifiable information with credit reference agencies, for example, as part of the lawful basis 'performance of a contract.' For more information on how credit reference agencies process personal data please visit <u>here</u>.

How do we store your data?

Our Company securely stores your data at Independent Lending, The Old Bank, 997 Abbeydale Road, Sheffield, S7 2QE and electronically.

Data Location	Security
Paper records	Locked cabinet or strong room
Electronic records	Secure cloud storage (UK)

Our Company will keep your data electronically or in paper form for a minimum period of 6 years following the service you receive from us, although your data could be held for a longer period where this may be needed to meet the requirements of our regulatory bodies. Once this time period has expired, we will delete your data by confidential disposal of any paper records and deletion of electronic files.

Marketing

Independent Lending understands that with the introduction of the Consumer Duty, it is likely the level of communications issued by our business will increase. This will be necessary to support customers to understand the products and services offered and to provide support to customer throughout the lifecycle of the relationship.

Our Company would like to send you information about products and services of ours that we think you might like.

If you have agreed to receive marketing, you may always opt out at a later date.

You have the right at any time to stop Our Company from contacting you for marketing purposes or giving your data to other members of the Our Company Group.

What are your data protection rights?

Our Company would like to make sure you are fully aware of all of your data protection rights. Every user is entitled to the following:

The right to access – You have the right to request Our Company for copies of your personal data. We may charge you a small fee for this service.

The right to rectification – You have the right to request that Our Company correct any information you believe is inaccurate. You also have the right to request Our Company to complete the information you believe is incomplete.

The right to erasure – You have the right to request that Our Company erase your personal data, under certain conditions.

The right to restrict processing – You have the right to request that Our Company restrict the processing of your personal data, under certain conditions.

The right to object to processing – You have the right to object to Our Company's processing of your personal data, under certain conditions.

The right to data portability – You have the right to request that Our Company transfer the data that we have collected to another organization, or directly to you, under certain conditions.



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If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us at our email:

Call us at: 03333 448878

Or write to us: Independent Lending, The Old Bank, 997 Abbeydale Road, Sheffield, S7 2QE

Cookies

Independent Lending does use cookies to track and test customer engagement and actions throughout the customer journey or customer communications. **Independent Lending** understand that under the Privacy and Electronic Communications Regulation (<u>PECR</u>) opt-in consent is required.

Cookies are text files placed on your computer to collect standard Internet log information and visitor behaviour information. When you visit our websites, we may collect information from you automatically through cookies or similar technology.

For further information, visit <u>www.allaboutcookies.org</u>.

How do we use cookies?

Our Company uses cookies in a range of ways to improve your experience on our website, including:

- Keeping you signed in
- Understanding how you use our website

What types of cookies do we use?

There are a number of different types of cookies, however, our website uses:

Functionality – Our Company uses these cookies so that we recognize you on our website and remember your previously selected preferences. These could include what language you prefer and location you are in. A mix of first-party and third-party cookies are used.

How to manage cookies

You can set your browser not to accept cookies, and the above website tells you how to remove cookies from your browser. However, in a few cases, some of our website features may not function as a result.

Privacy policies of other websites

Independent Lending's website contains links to other websites.] If you click on a link to another website, our privacy policy no longer applies, and we recommend you review that sites privacy policy to establish how they will process your data.

Changes to our privacy policy

Our Company keeps its privacy policy under regular review and places any updates on this web page. This privacy policy was last updated on 14 February 2024.

How to contact us

If you have any questions about Our Company's Privacy Policy, the data we hold on you, or you would like to exercise one of your data protections rights, please do not hesitate to contact us.

Email us at: stuart.vitty@indpendentlending.co.uk Call us: 03333 448878 Or write to us at: **Independent Lending, The Old Bank, 997 Abbeydale Road, Sheffield, S7 2QE**

How to contact the appropriate authority

Should you wish to report a complaint or if you feel that Our Company has not addressed your concern in a satisfactory manner, you may contact the Information Commissioner's Office at <u>www.ico.org.uk</u>