



DATA PRIVACY NOTICE

We take your privacy very seriously and we ask that you read this privacy notice carefully as it contains important information on who we are, how and why we collect, store, use and share personal data, your rights in relation to your personal data and on how to contact us and supervisory authorities in the event you have a complaint.

Italicised words in this privacy notice have the meaning set out in the Glossary of Terms at the end of this document.

Who we are

Premier Mortgage Service Limited, a company registered in England and Wales (company number 05011650) whose registered office is at Pixham End, Dorking, Surrey RH4 1QA.

When we mention "PMS", "we", "us" or "our" we are referring to Premier Mortgage Service Limited.

We are an appointed representative of Sesame Limited. Sesame Limited is a company registered in England and Wales (company number 2844161) whose registered office is at Pixham End, Dorking, Surrey RH4 1QA. Sesame Limited is authorised and regulated by the Financial Conduct Authority. Sesame Limited's Financial Services Register number is 150427.

We collect, use and are responsible for certain personal data about you. When we do so we are required to comply with data protection law and we are responsible as a *data controller* of that personal data for the purposes of those laws.

The personal data we collect and use

In the course of providing the *PMS services* we may collect the following personal data when you provide it to us:

- *contact information*
- *identity information*
- *financial information*
- *performance records*
- employment history
- data about criminal convictions or offences

Information collected from other sources

We may also obtain personal information from other sources. Where we obtain this information from another party it is their responsibility to make sure they explain that they will be sharing personal data with us and, where necessary, ask permission before sharing information with us.

How we use your personal data

The below table sets out:

- how we use your personal data
- the lawful bases upon which we collect and use your personal data
- who we routinely share your personal data with (some of these third party recipients may be based outside the European Economic Area — for further information including on how we safeguard your personal data when this occurs, see 'Transfer of your information out of the EEA' below)

Rationale/Reason for Processing	Lawful Basis for Processing	Third party recipients linked to that activity
<ul style="list-style-type: none"> • to provide you with the <i>PMS services</i> • to administer your contract with us • to correspond with you in relation to the <i>PMS services</i> • to update our records 	Performance of a contract	External supplier(s) of software services through which we manage our communications with you
<ul style="list-style-type: none"> • to set up your agencies with <i>product providers</i> on our panels (including notifying them of any changes to your details) • administering the payment of procuration fees and commission as a result of business placed through our panels 	Performance of a contract	<i>Product providers</i>
<ul style="list-style-type: none"> • to administer your attendance at our events, including the issue of CPD certificates 	Performance of a contract	External supplier(s) of software services through which we manage our event registrations
<ul style="list-style-type: none"> • where applicable, to set you up with access to our technology and compliance IT packages 	Performance of a contract	External supplier(s) of technology and compliance IT packages, including mortgage sourcing and protection product quote and apply systems
<ul style="list-style-type: none"> • following attendance at our events, to pass your registration details on to <i>product providers</i> 	Consent	<i>Product providers</i>
<ul style="list-style-type: none"> • to provide you with details of products and services from us and third parties that may be of interest to you in accordance with your 	Consent or legitimate interests depending upon the nature of the marketing	External supplier(s) of email marketing platform services which send marketing communications on our behalf

preferences. For more information see 'Marketing' below		
<ul style="list-style-type: none"> to provide management information packs to <i>product providers</i> 	Legitimate interests – we have a legitimate interest in providing management information packs to <i>product providers</i> in order that they can better identify how to engage and support you, including the provision of educational support and training on their products. This may enable you to offer more holistic advice across a range of products	<i>Product providers</i>
<ul style="list-style-type: none"> to manage legal claims 	Legitimate interests – we have a legitimate interest in protecting <i>ourselves</i> from breaches of legal obligations owed to <i>us</i> and to defend <i>ourselves</i> from litigation. This is needed to ensure that <i>our</i> legal rights and interests are managed appropriately	<i>Our</i> professional indemnity insurers and insurance adviser <i>Our</i> external solicitors
<ul style="list-style-type: none"> to evidence satisfaction of any request made by you in accordance with your rights under <i>data protection regulation</i> 	Compliance with a legal obligation	Information Commissioner's Office
<ul style="list-style-type: none"> to perform administrative tasks in relation to the above referenced uses of your data 	Legitimate interests – we have a legitimate interest in transmitting personal data to other organisations within <i>our</i> group for centralised administration purposes	The Sesame Bankhall group

Criminal record data

Criminal record data is considered more sensitive and so is subject to additional levels of protection under *data protection regulation*.

Where a *product provider* requests it, we may process criminal conviction or offence information when we set up our agencies with *product providers* on our general insurance panels. When we do so, in addition to the lawful basis for processing this information set out above, we will be processing it based upon your consent.

You're free at any time to change your mind and withdraw your consent. The consequence might be that we are unable to provide you with full access to our panels.

Marketing

We may use personal data we hold about you to help us identify, tailor and provide you with details of products and services from us that may be of interest to you. We will only do so where we have either obtained your consent or have a legitimate business reason to do this and in either case will do so in accordance with any marketing preferences you have provided to us.

In addition, where you provided your consent, we may provide you with details of products and services of third parties where they may be of interest to you.

You can opt out of receiving marketing at any time. If you wish to amend your marketing preferences please contact us:

By phone: 0345 230 8000

By email: marketing@trustpms.com

In addition, you can opt out of receiving marketing at any time by clicking the 'unsubscribe' link at the bottom of every email.

Whether information has to be provided by you, and if so why

We will tell you if providing some personal data is optional, including if we ask for your consent to process it. In all other cases you must provide your personal data in order for us to provide you with the *PMS services*.

How long your personal data will be kept

We will hold your personal data for differing periods of time depending upon the reason we have for processing it. The following criteria are used to determine data retention periods for your personal data:

- Retention in case of queries – we will retain your personal data for as long as we reasonably consider it necessary to deal with your queries (e.g. any questions you may have in relation to the *PMS services*).
- Retention in case of claims – we will retain your personal data for as long as we reasonably consider that you might legally bring a claim against us.
- Retention in accordance with legal and regulatory requirements – we will retain your personal data after we have ceased providing services to you for as long as we are required/permitted to retain it for based upon our legal and regulatory obligations.

Transfer of your information out of the EEA

We may transfer your personal data to certain of *our* suppliers and sub-contractors which are located outside the European Economic Area (EEA). Where we do so we will make sure that it is protected in a similar way as if it was being used in the EEA. We'll use one of these safeguards:

- the transfer will be to a non-EEA country with privacy laws that give the same protection as the EEA
- the transfer will be subject to a European Commission approved contract designed to help safeguard your privacy rights and give you remedies in the unlikely event of a misuse of your personal data
- the transfer will be to organisations that are part of Privacy Shield (this is a framework that sets privacy standards for data sent between the US and EU countries and it makes sure those standards are similar to the standards used within the EEA)
- the transfer will be subject to binding corporate rules (agreements governing transfers made between organisations within a corporate group)

You have a right to ask us for more information about any transfer of your personal data outside of the EEA, including the safeguards in place. To learn more, please see 'Your rights' below.

Your rights

You have legal rights under *data protection regulation* in relation to your personal data. These are set out under the below headings:

- To access personal data
- To correct / erase personal data
- To restrict how we use personal data
- To object to how we use personal data
- To ask us to transfer personal data to another organisation
- To object to automated decisions
- To find out more about how we use personal data

We may ask you for proof of identity when making a request to exercise any of these rights. We do this to ensure we only disclose information or change your details where we know we are dealing with the right individual.

We will not ask for a fee, unless we think your request is unfounded, repetitive or excessive. Where a fee is necessary, we will inform you before proceeding with your request.

We aim to respond to all valid requests within one month. It may however take us longer if the request is particularly complicated or you have made several requests. We will always let you know if we think a response will take longer than one month. To speed up *our* response, we may ask you to provide more detail about what you want to receive or are concerned about.

We may not always be able to fully address your request, for example if it would impact the duty of confidentiality we owe to others, or if we are otherwise legally entitled to deal with the request in a different way.

To access personal data

You can ask us to confirm whether or not we have and are using your personal data. You can also ask to get a copy of your

personal data from us and for information on how we process it.

To rectify / erase personal data

You can ask that we rectify any information about you which is incorrect. We will be happy to rectify such information but would need to verify the accuracy of the information first.

You can ask that we erase your personal data if you think we no longer need to use it for the purpose we collected it from you.

You can also ask that we erase your personal data if you have either withdrawn your consent to us using your information (if we originally asked for your consent to use your information), or exercised your right to object to further legitimate use of your information, or where we have used it unlawfully or where we are subject to a legal obligation to erase your personal data.

We may not always be able to comply with your request, for example where we need to keep using your personal data in order to comply with *our* legal obligation or where we need to use your personal data to establish, exercise or defend legal claims.

To restrict our use of personal data

You can ask that we restrict *our* use of your personal data in certain circumstances, for example

- where you think the information is inaccurate and we need to verify it;
- where *our* use of your personal data is not lawful but you do not want us to erase it;
- where the information is no longer required for the purposes for which it was collected but we need it to establish, exercise or defend legal claims; or
- where you have objected to *our* use of your personal data but we still need to verify if we have overriding grounds to use it.

We can continue to use your personal data following a request for restriction where we have your consent to use it; or we need to use it to establish, exercise or defend legal claims, or we need to use it to protect the rights of another individual or a company.

To object to use of personal data

You can object to any use of your personal data which we have justified on the basis of our legitimate interest, if you believe your fundamental rights and freedoms to data protection outweigh *our* legitimate interest in using the information. If you raise an objection, we may continue to use the personal data if we can demonstrate that we have compelling legitimate interests to use the information.

To request a transfer of personal data

You can ask us to provide your personal data to you in a structured, commonly used, machine-readable format, or you can ask to have it transferred directly to another *data controller* (e.g. another company).

You may only exercise this right where we use your personal data in order to perform a contract with you, or where we asked for your consent to use your personal data. This right does not apply to any personal data which we hold or process outside automated means.

To contest decisions based on automatic decision making

If we made a decision about you based solely by automated means (i.e. with no human intervention), and the decision made by us produces a legal effect concerning you, or

significantly affects you, you may have the right to contest that decision, express your point of view and ask for a human review. These rights do not apply where we are authorised by law to make such decisions and have adopted suitable safeguards in our decision making processes to protect your rights and freedoms.

To obtain a copy of our safety measures for transfers outside of Europe

You can ask for a copy of, or reference to, the safeguards we have put in place when your personal data is transferred outside of the European Economic Area. We are not required to share details of these safeguards where sharing such details would affect our commercial position, or create a security risk.

You can contact us for more information

If you are not satisfied with the level of information provided in this privacy notice, you can ask us about what personal data we have about you, what we use your information for, who we disclose your information to, whether we transfer it abroad, how we protect it, how long we keep it for, what rights you have, how you can make a complaint, where we got your data from and whether we have carried out any automated decision making using your personal data.

If you would like to exercise any of the above rights, please:

- email or write to our Data Protection Officer at dataprivacy@sbg.co.uk or Premier Mortgage Service Limited, Fourth Floor, Jackson House, Sibson Rd, Sale M33 7RR;
- let us have enough information to identify you, e.g. name, address, date of birth;
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- let us know the information to which your request relates.

Keeping your personal data secure

We have appropriate security measures in place to prevent personal data from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal data to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Our supervisory authority

If you are not happy with the way we are handling your information, you have a right to lodge a complaint with the Information Commissioners Office (www.ico.org.uk).

We ask that you please attempt to resolve any issues with us before the ICO.

How to contact us

Please contact our Data Protection Officer if you have any questions about this privacy notice or the information we hold about you.

If you wish to contact our Data Protection Officer, please send an email to dataprivacy@sbg.co.uk or write to Premier Mortgage Service Limited, Fourth Floor, Jackson House, Sibson Rd, Sale M33 7RR.

Glossary of Terms

PMS, we, us or our	Premier Mortgage Service Limited, a company registered in England and Wales (company number 05011650) whose registered office is at Pixham End, Dorking, Surrey RH4 1QA.
contact information	these are details that can be used to contact a person, including title, first name, surname, personal telephone number, fax, email address, home address, country, postcode or city of residence. This may also include work contact information such as work telephone number, fax, work email and work address
data controller	means a natural or legal person (such as a company) which determines the means and purposes of processing of personal data. For example, we are your data controller as we determine how we will collect personal data from you, the scope of data which will be collected, and the purposes for which it will be used in the course of us providing you with the PMS services
data protection regulation	applicable data privacy and protection laws
FCA	the Financial Conduct Authority, being the independent watchdog that regulates financial services
financial information	this is information relating to your financial status, including bank account details, debts and county court judgments
identity information	this is any information that can be used to distinguish a person or verify their identity, such as name, date of birth, place of birth, gender, marital status, national identity card/number, passport, drivers licence and national insurance number
performance records	this is information about your performance as an adviser, including details of your compliance record, disciplinary record and any complaint made against you
PMS services	these are the services we provide to you, which may include: <ul style="list-style-type: none"> • access to the PMS Mortgage Club • access to our protection panels • access to our general insurance panels • provision of ancillary IT, technology and compliance services
product provider	a company which provides mortgage, protection and/or general insurance products