

**LIFT**-Mortgages

# Privacy Notice



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## 1. Introduction

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Our privacy policy contains important information about what personal details we collect, what we do with that information; who we may share it with and why; and your choices and rights when it comes to the personal information you have given us.

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## 2. Information we collect & use

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Information about you that we collect and use includes:

- Information about who you are e.g. your name, date of birth and contact details
- Information connected to your product or service with us e.g. your bank details
- Information about your contact with us e.g. meetings, phone calls, emails/letters
- Information that is automatically collected e.g. via cookies when you visit our website
- Information classified as “sensitive” personal information e.g. relating to your health, marital or civil partnership status. This information will only be collected and used when it’s needed to provide the product or service you requested, or to comply with our legal obligations
- Information you may provide about other people e.g. joint applicants or beneficiaries
- Information on children where a plan is being implemented for their benefit

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## 3. Where we collect your information

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We may collect your personal information directly from you, from a variety of sources, including:

- Meetings with one of our financial planners
- A product or service application form
- Telephone conversations with us
- Emails or letters you send to us
- Participating in research surveys to help us understand you better and improve our products and services
- Our online services, such as the website and the Personal Finance Portal

We may need to gather personal information about your close family members and dependants in order to provide our service to you effectively. In such cases it will be your responsibility to ensure that you have the consent of the people concerned to pass their information on to us. We will provide a copy of this privacy notice for them or, where appropriate, ask you to pass the privacy information to them.

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## 4. What we collect & use your information for

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We will only collect your information with your permission where it is necessary, fair and lawful to do so. We will collect and use your information only where:

- You have given us your consent for marketing
- The collection is necessary to provide the product or service you have requested
- It is necessary for us to meet our legal or regulatory obligations
- It is in the legitimate interests of LIFT-Mortgages, e.g. to deliver appropriate information and guidance in relation to regulatory or legal change

If you do not wish us to collect and use your personal information in these ways, it may mean that we will be unable to provide you with services. The primary legal basis that we intend to use for the processing of your data is to fulfil our contractual obligations. The information that we collect about you is essential for us to be able to carry out the services that you require from us effectively. Without collecting your personal data we would also be unable to fulfil our legal and regulatory obligations.

Where special category data is required we will obtain your explicit consent in order to collect and process this information. You should be aware that you have the right to withdraw this consent at any time.

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## 5. Who we may share your information with

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We may share your information with third parties for the reasons outlined in "What we collect & use your information for". These third parties include:

- Companies who are providing you with the recommended product or service, for example an investment platform or insurance company
- Our regulators and supervisory authority e.g. the Financial Conduct Authority (FCA) or the Information Commissioner's Office (ICO)
- Law enforcement, credit and identity check agencies for the prevention and detection of crime
- HM Revenue & Customs (HMRC) e.g. for the processing of tax relief on pension payments for the prevention of tax avoidance

We will never sell your details to someone else. We will work within our obligations to keep your information safe and secure.

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## 6. Where your information is processed

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Your information is processed only in the UK. However some of the third parties which we pass information to may process data outside of the UK.

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## 7. How we protect your information

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We take information and system security very seriously and we strive to comply with our obligations at all times. Any personal information which is collected, recorded or used in any way, whether on paper, online or any other media, will have appropriate safeguards applied in line with our data protection obligations.

Your information is protected by controls designed to minimise loss or damage through accident, negligence or deliberate actions. Our employees also protect sensitive or confidential information when storing or transmitting information electronically and must undertake annual training on this.

Our security controls are aligned to industry standards to enable LIFT to manage the risks to the confidentiality, integrity and availability of your information.

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## 8. How long we keep your information

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We will retain all client information indefinitely once advice has been provided. This is due to the regulatory framework we work under, and the requirement to be able to demonstrate suitability of advice for the lifetime of our clients.

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## 9. Your rights

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You have the following rights in relation to your data:

- **Right to be informed** – you have a right to receive clear and easy to understand information on what personal information we have, why and who we share it with; as detailed within this document.
- **Right of access** – you have the right of access to your personal information. If you wish to receive a copy of the personal information we hold on you, you may make a data subject access request (DSAR).
- **Right to request** that your personal information be rectified – if your personal information is inaccurate or incomplete, you can request that it is corrected.

- **Right to be forgotten** – you can ask for your information to be deleted or removed if there is not a compelling reason for LIFT to continue to have it.
- **Right to restrict processing** – you can ask that we block or suppress the processing of your personal information for certain reasons. This means that we are still permitted to keep your information – but only to ensure we don't use it in the future for those reasons you have restricted. A typical example would be marketing.
- **Right to data portability** – you can ask for a copy of your personal information for your own purposes to use across different services. In certain circumstances, you may move, copy or transfer the personal information we hold to another company in a safe and secure way.
- **Right to object** – you can object to LIFT processing your personal information where: it's based on our legitimate interests; for direct marketing; and if we were using it for scientific/historical research and statistics.
- **Rights related to automatic decision making including profiling** – you have the right to ask LIFT to:
  - Give you information about its processing of your personal information
  - Request human intervention or challenge a decision where processing is done solely by automated processes
  - Carry out regular checks to make sure that our automated decision making and profiling processes are working as they should

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## 10. How to make a complaint

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We will always strive to collect, use and safeguard your personal information in line with data protection laws. If you do not believe we have handled your information as set out in our privacy policy, please contact Matthew Smith, our Compliance Officer by either of the following mediums:

Email: [matthew.smith@lift-financial.com](mailto:matthew.smith@lift-financial.com)

Tel: 0161 929 2626

Address: Century House, Regent Road, Altrincham, Cheshire, WA14 1RR

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