

Key Solutions Privacy Policy

1. About Key Solutions Mortgages Limited and how you can contact us

Key Solutions Mortgages Limited is a private limited company registered at Companies House under the identifier 03022389.

You can contact us in the following ways:

Our registered address: Westwick House
 Summer Lane
 West Wick
 Weston-super-Mare
 BS24 7TE

Phone Number: 01934 520 777
E-mail: enquiries@ksmortgages.co.uk
Web: www.ksmortgages.co.uk

We are registered with the Information Commissioner, which is the UK's independent authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals. Our registration number is Z8889450. This privacy policy was last updated June 2021

2. The type of personal information we collect

Our business is acting as a mortgage and protection intermediary. Pursuant to the provision of this service, we may collect and process the following information:

- Personal identifiers, contacts and characteristics (for example, name and contact details)
- Your nationality and/or residence status
- Your dependents
- Your employment status, income and expenditure
- Your banking and credit history
- Your property and tenancy status and history
- Payment and/or direct debit information
- Your health, family and medical history



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This list is not intended to be exhaustive. Some lenders or insurers may request case-specific information in order to determine if they are able to offer their products or services to you.

3. How we get the personal information and why we have it

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- Assessing your ability to obtain secured borrowing
- Submitting applications for secured borrowing on your behalf
- Assessing your ability to obtain insurance products
- Submitting applications for insurance products on your behalf

We may also receive personal information indirectly, from the following sources in the following scenarios:

- If it is supplied by a co-applicant to a mortgage or insurance product we are arranging for you
- If you are referred to us by a third party
- If we are required to conduct checks to verify your identity in order to prevent or limit the spread of identity theft or financial crime

We may share this information with:

- Banks, building societies and credit providers
- Insurance providers
- TransUnion (identity checking)
- Providers of hosted call recording technology
- The Financial Conduct Authority
- The Financial Ombudsman Service
- Three60 CRM (customer relationship software)
- Twenty7Tec (mortgage sourcing software)
- iPipeline UK (protection sourcing software)

We may share your information with our expert partners but we will always seek your consent before doing so:

- Nest GI Ltd (home insurance specialists)

We may be required to share your information if we are compelled to by an act of parliament or by order of a court.



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We may also be required to share your information with the National Crime Agency if we believe there is a risk you are associated with an act of fraud or money laundering or where we have a lawful obligation to protect the public from crime or dishonesty.

4. Legal grounds for processing your information

Under the General Data Protection Regulation (GDPR), the lawful bases we may rely on for processing this information are as follows:

(a) Your consent. You are able to remove your consent at any time. You can do this by contacting enquiries@ksmortgages.co.uk. Processing your information with your consent could include:

- Where you have given us your permission to pass information on to a third-party service provider
- Where you have given us your permission to send you direct marketing
- Where you have given us your permission to publish reviews of our service
- Where we invite you to participate in competitions, prize draws, surveys or other market/customer research

(b) We have a contractual obligation. This is often the lawful basis for companies to obtain data if they are providing you with a service. However, as we acting as an intermediary on your behalf and no legal contract exists between us, we do not rely upon this basis to process customer information. We may rely upon this basis in the following situations:

- Contracts held with suppliers
- Employment contracts

(c) We have a legal obligation. We may be obliged to share your information under this lawful basis if we are compelled to by a court order or at the request of a regulatory body, such as the Financial Conduct Authority or Financial Ombudsman Service.

(d) We have a vital interest and (e) we need it to perform a public task. In both of these instances, we might be compelled to share your data if doing so is deemed to be in the greater public interest, such as:

- Suspicion of money laundering and/or terrorist financing, whether committed or intended
- Suspicion of fraud, tax evasion or other crimes, whether committed or intended
- Upholding our duty to protect the public interest



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(f) Legitimate Interest. In most instances, you will share your data with us because you want us to perform certain services on your behalf. We are therefore deemed to be acting in your legitimate interest. This allows us to use your data to provide services at your request, as long as our interest in using the data does is not outweighed by your rights to privacy. In practice, this means we can only use your data in ways you could reasonably expect or where we can prove a compelling justification for processing. **We rely on this lawful basis for the provision of advice to you and any subsequent applications we make on your behalf.**

How we store your personal information

Your information is securely stored either in the United Kingdom or within the confines of the European Union under equivalent legislation.

We keep client records as follows:

- If you chose to take out a financial product as a result of a recommendation we make to you, we will retain a record of the data used by us to determine suitability and affordability of said recommendations (along with a record of the interactions between us) in order to meet our regulatory obligations and assist you with any complaints that may arise. We are entitled to retain such records for the planned lifetime of the products plus a further 6 years.
- If you chose to take our recommendation for financial products and we submit an application on your behalf but you do not go on to become a client of the provider concerned, we are entitled to retain your records for 6 years in order to evidence our compliance with anti-money laundering and prevention of financial crime requirements.
- If we make a recommendation to you but you chose not to use our service in order to submit an application to the provider or providers concerned, we are entitled to retain your records for 3 years. This is to ensure we can provide sufficient evidence to our regulator to substantiate the suitability of our advice.
- If we engage with you regarding the provision of our service but are not able to assist you at that time we may keep your records for up to 1 year. This is done to enable us to more easily assist you if you chose to retain our services again during this time period.



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Your data protection rights

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal information.

Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing - You have the the right to object to the processing of your personal information in certain circumstances.

Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances. You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at enquiries@ksmortgages.co.uk if you wish to make a request.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at enquiries@ksmortgages.co.uk

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>



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