



**Birdlip
Christchurch
Road Ferndown
Dorset BH22 8TA
BH22 8TA**

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 your 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

Willowlace Ltd t/a Debbie J Boyes Professional Mortgage Advisors collects, uses and is responsible for certain personal data about you. When we do so we are required to comply with *data protection regulation* and we are responsible as a *data controller* of that personal data for the purposes of those laws.

When we mention **Willowlace Ltd** "we", "us" or "our" we are referring to **Willowlace Ltd t/a Debbie J Boyes Professional Mortgage Advisors**. You can contact us at Birdlip, Christchurch Road, Ferndown, Dorset, BH22 8TA.

Willowlace Ltd is an Appointed Representative of *Sesame*. This means that *Sesame* is responsible for the regulated activities performed by us as set out in the *Initial Disclosure Document* given to you by us. In other words, *Sesame* is responsible for making sure that authorised sales we make to you and advice we give to you are compliant with the rules and regulations that apply to financial services in the UK and with *Sesame's* policies and procedures.

We and *Sesame* have certain shared systems (and so shared access to your personal data). This means that in respect of certain personal data of yours, we and *Sesame* will be joint *data controllers*.

The manner in which *Sesame* will process your data is set out in a separate Privacy Notice which we will provide to you at the start of our engagement. If you require a copy of this Privacy Notice, please ask us.

The personal data we collect and use

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

- *contact information*

- *identity information*
- *financial information*
- *payment information*
- *employment status and details*
- *lifestyle information*
- *health information*
- *data about criminal convictions or offences*
- *details of any vulnerability*
- *details of your dependents and/or beneficiaries under a policy, donor(s) of funds for mortgage deposit, tenant/landlord information etc (if you are providing information about another person, we expect you to ensure that they know that they are doing so and are content with their information being provided to us. You might find it helpful to show them this Privacy Notice and if they have any concerns please contact us in one of the ways described below.)*
- product details (existing and new mortgage, insurance etc), property details (residential, commercial and buy to let), pension, investments, etc where applicable.
- *soft facts eg sports, hobbies, aspirations, preferences, expected retirement ages etc*
- *credit history*
- *lenders and insurance companies may require other information but you will be informed of the requirements in advance.*

Information collected from other sources

We also obtain personal data from other sources in the course of providing our *intermediary services*. 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.

The personal data we obtain from other sources may include the following:

- **From lenders and/or product providers:**
 - *product details*
- **From Sesame Limited:**
 - details of any complaint about our services and/or the suitability of any advice we give you
- **From other relevant professionals**
 - Information about, for example, HMRC Tax Returns, Accounts etc

- Information regarding a property you are buying or remortgaging
- Information about pension, investments, etc where applicable
- Information from Housing Associations/Letting Agents/Landlords etc
- **From identification and verification checking agencies:**
 - *identity information*
 - *sanction check information*

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 <i>intermediary services</i> • to assist in the administration of any <i>products</i> you have obtained through us 	Performance of a contract	<i>Sesame Bankhall Group</i> <i>Sesame Group India Pvt Ltd</i> <i>The Aviva Group (Sesame's parent company)</i> <i>Lenders/product providers</i> <i>External Solicitors</i> <i>Other professionals eg Independent Financial Advisors, Accountants, Valuers etc</i>
<ul style="list-style-type: none"> • to apply for decisions in principle for mortgage products and/or quotations for protection and/or general insurance products on your behalf • to apply for <i>products</i> on your behalf 	Performance of a contract	<i>Sesame Bankhall Group</i> <i>Sesame Group India Pvt Ltd</i> <i>The Aviva Group (Sesame's parent company)</i> Lenders/product providers External supplier(s) of software services through which we review, source and apply for decisions in principle, quotations and/or products on your behalf
<ul style="list-style-type: none"> • to refer you to other professionals to provide you with advice 	Consent	<i>These vary from time to time and we will inform you prior to sharing your information</i>
<ul style="list-style-type: none"> • to manage complaints 	Compliance with a legal obligation	<i>Sesame Bankhall Group</i> <i>Sesame Group India Pvt Ltd</i> <i>The Aviva Group (Sesame's parent company)</i> <i>The Financial Ombudsman Service</i> <i>The Financial Conduct Authority</i> <i>Lender/Product Provider</i> <i>Our/Sesame's external solicitors</i> <i>Our/Sesame's professional indemnity insurers and insurance adviser</i> <i>External consultants/advisers to assist in assessing complaints</i> <i>The Aviva Group (Sesame's parent company)</i>
<ul style="list-style-type: none"> • to manage legal claims 	Legitimate interests – we have a legitimate interest in protecting <i>ourselves</i> from	<i>Sesame Bankhall Group</i> <i>Sesame Group India Pvt Ltd</i> <i>The Aviva Group (Sesame's parent</i>

	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>company</i>) <i>Our/Sesame's external solicitors</i> <i>Our/Sesame's professional indemnity insurers and insurance adviser</i> <i>The Aviva Group (Sesame's parent company)</i>
<ul style="list-style-type: none"> to share with Sesame as the company responsible for making sure that all sales we make to you and advice we give to you are compliant with the rules and regulations that apply to financial services in the UK and with their policies and procedures 	Compliance with a legal obligation	<i>Sesame Bankhall Group</i> <i>Sesame Group India Pvt Ltd</i> <i>The Aviva Group (Sesame's parent company)</i> <i>The Financial Conduct Authority</i> <i>Lender/Product Provider</i> <i>External consultants/advisers to assist in assessing complaints</i> <i>The Aviva Group (Sesame's parent company)</i>
<ul style="list-style-type: none"> to obtain feedback from you on the service you have received from <i>us</i> 	Legitimate interests – we have a legitimate interest in operating <i>our</i> business. This includes ensuring that the service we provide is of a satisfactory standard	<i>Sesame Bankhall Group</i> <i>Sesame Group India Pvt Ltd</i> <i>The Aviva Group (Sesame's parent company)</i> <i>External supplier(s) of software services to obtain feedback from you as an when used</i> <i>Posted/emailed Client Survey</i>
<ul style="list-style-type: none"> to retain records of any services or advice provided to you in accordance with <i>our</i> regulatory obligations 	Compliance with a legal obligation	<i>Sesame Bankhall Group</i> <i>Sesame Group India Pvt Ltd</i> <i>The Aviva Group (Sesame's parent company)</i> <i>External supplier(s) of data storage and data hosting services to retain records on our behalf</i>
<ul style="list-style-type: none"> to retain records of any services or advice provided to you by us in order to defend potential legal claims or complaints 	Legitimate interests – we have a legitimate interest in defending <i>ourselves</i> from legal claims and complaints. This is needed to ensure that <i>our</i> legal rights and interests are managed appropriately	<i>Sesame Bankhall Group</i> <i>Sesame Group India Pvt Ltd</i> <i>The Aviva Group (Sesame's parent company)</i> <i>External supplier(s) of data storage and data hosting services to retain records on our behalf</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 preferences. For more information see 'Marketing' below 	Consent Legitimate interests	<i>These vary from time to time and we will inform you prior to sharing your information</i>
<ul style="list-style-type: none"> to detect, prevent and investigate fraudulent applications for <i>products</i> to undertake investigations into allegations of misconduct and/or criminal offences to notify the relevant authorities of any suspicious activity following an investigation undertaken by <i>us</i> into allegations of misconduct and/or criminal offences 	Compliance with a legal obligation. We also consider that we have a legitimate interest in protecting <i>ourselves</i> , other parties and the financial services industry more widely in detecting, preventing and investigating financial crime and/or misconduct	<i>Sesame Bankhall Group</i> <i>Sesame Group India Pvt Ltd</i> <i>The Aviva Group (Sesame's parent company)</i> <i>The Financial Conduct Authority</i> <i>Lenders/product providers</i> <i>National Crime Agency (NCA)</i> <i>Police</i> <i>HMRC</i>

<ul style="list-style-type: none"> to undertake anti-money laundering, identification and verification checks, including assessment of your <i>sanction check information</i> (any personal data obtained for the purposes of meeting with The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations Act 2017 will only be processed for the purposes of preventing money laundering or terrorist financing, unless the use of the data is permitted by or under another enactment other than those Regulations, or we have another lawful basis for processing it) 	Compliance with a legal obligation	<p><i>Sesame Bankhall Group</i> <i>Sesame Group India Pvt Ltd</i> <i>The Aviva Group (Sesame's parent company)</i></p> <p><i>External supplier(s) to conduct anti-money laundering, identification and verification checks on our behalf who consult external identification and anti-money laundering databases</i></p> <p><i>Lenders/product providers</i></p>
<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 trace your whereabouts to contact you about any advice provided to you 	Compliance with a legal obligation	Tracing agents
<ul style="list-style-type: none"> to perform administrative tasks in relation to the above referenced uses of your data 	Legitimate Interest	<p><i>Sesame Bankhall Group</i> <i>Sesame Group India Pvt Ltd</i> <i>The Aviva Group (Sesame's parent company)</i></p> <p><i>Lender/Product Providers</i></p> <p><i>Trello</i></p> <p><i>APP.123FORMBUILDER.COM</i></p>
<ul style="list-style-type: none"> to ensure you continue to receive advice should we cease trading for reasons such as bankruptcy, death or if we leave the Sesame Network and do not wish to continue to provide services to you. 	Legitimate Interest	<p><i>Sesame Bankhall Group</i> <i>Sesame Group India Pvt Ltd</i> <i>The Aviva Group (Sesame's parent company)</i></p> <p><i>Another advisor in the Sesame Network</i></p> <p><i>Lender/product provider</i></p>
<ul style="list-style-type: none"> to identify any commission or fee payments due to us as a result of the service we have provided to you 	Legitimate interest	<p><i>Sesame Bankhall Group</i> <i>Sesame Group India Pvt Ltd</i> <i>The Aviva Group (Sesame's parent company)</i></p> <p><i>Lender/product provider</i></p>

Special category data and criminal records data

Certain types of personal data are considered more sensitive and so are subject to additional levels of protection under data protection legislation. These are known as 'special categories of data' and include data concerning your health, racial or ethnic origin, genetic data and sexual orientation. Data relating to criminal convictions or offences is also subject to additional levels of protection.

We may process:

- health information and lifestyle information when providing *intermediary services as part of our advice or application* in relation to a protection insurance product; and/or
- criminal conviction or offence information when providing *intermediary services* and any advice or

application in relation to a general insurance product.

In addition to the lawful basis for processing this information set out in the above table, we will be processing it either (i) for the purpose of advising on, arranging or administering an insurance contract or (ii) for the establishment, exercise or defence of legal claims.

In the course of our activities relating to the prevention, detection and investigation of financial crime, we may process criminal conviction or offence information. Where we do so, in addition to the lawful basis for processing this information set out in the above table, we will be processing it for the purpose of compliance with regulatory requirements relating to unlawful acts and dishonesty.

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 obtained your consent or where we have a legitimate business reason to do this and 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: 01202 874100

By email: mortgages@willowlaced.co.uk

By Post: Birdlip, Christchurch Road, Ferndown, Dorset, BH22 8TA

In addition, you can opt out of receiving marketing at any time by clicking the 'unsubscribe' link in 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 *intermediary 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 retentions periods for your personal data :-

Type of Record	Retention Period
Client file containing a record of any <i>intermediary services</i> provided by us	For as long as we reasonably consider that: <ul style="list-style-type: none"> we may need to deal with your queries you might legally bring a claim against us
Complaint file containing a record of any claim you have brought against us	For as long as we reasonably consider that you might legally bring an additional or repeat claim against us
Marketing lists	<i>You are able to unsubscribe at any time and will then be removed from our marketing lists</i>
Results of anti-money laundering, identification and verification checks, including assessment of your <i>sanction check information</i>	For as long as we are required/permitted to retain this personal data based upon our legal and regulatory obligations
Fraud and financial crime files	For as long as we reasonably consider that:

	<ul style="list-style-type: none"> we are required/ permitted to retain this personal data based upon our legal and regulatory obligations they may be required in the establishment, exercise or defence of legal claims
Records of satisfaction of any request made by you in accordance with your rights under <i>data protection regulation</i>	3 years from the date the request was satisfied
Records of any commission or fee payments due to us as a result of the service we have provided to you	For as long as we reasonably consider that we need to retain these for audit purposes

Transfer of your information out of the EEA

We may transfer your personal data to the following which are located outside the European Economic Area (EEA) as follows:

- Sesame Group India Pvt Limited, based in India. This is a company in the same group as Sesame which is used to :
 - Access the suitability of any advice provided to you and/or the competency of us in compliance with Sesame's monitoring and oversight obligations
 - Undertake anti-money laundering, identification and verification checks, including assessment of your sanction check information.

India does not have the same data protection laws as the United Kingdom and EEA. Whilst the European Commission has not given a formal decision that India provides an adequate level of data protection similar to those which apply in the United Kingdom and EEA, any transfer of your personal data 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.

- Suppliers and sub-contractors which provide services to us. If we do transfer your personal data to our suppliers and sub-contractors outside of the EEA, 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 a framework that sets privacy standards for data sent between the US and EU countries and makes sure

those standards are similar to the standards used within the EEA

- o 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 understand how *we* protect information transferred outside EEA
- 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 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* (eg 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 (ie 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 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, for how long we keep it, 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 Debbie Boyes, Data Protection Officer at mortgages@willowlaced.co.uk or Willowlace Ltd, Birdlip, Christchurch Road, Ferndown, Dorset, BH22 8TA
- let us have enough information to identify you, eg 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.

Data anonymisation and aggregation

Your personal data may be converted into statistical or aggregated data which cannot be used to identify you, then used to produce statistical research and reports.

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 approaching the ICO.

How to contact us

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

If you wish to contact **Debbie Boyes**, Data Protection Officer please send an email to mortgages@willowlaced.co.uk or write to Willowlace Ltd, Birdlip, Christchurch Road, Ferndown, Dorset, BH22 8TA

Glossary of Terms

we, us or our	Willowlace Ltd t/a Debbie J Boyes Professional Mortgage Advisors a company registered in (England and Wales) 08345357 and having its registered office at Birdlip, Christchurch Road, Ferndown, Dorset, BH22 8TA		
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 <i>intermediary services</i>		
data protection regulation	applicable data privacy and protection laws		
employment status	this is information about your work, if you are employed, self-employed, unemployed, a student or on job seeker allowance etc		
FCA	the Financial Conduct Authority, being the independent watchdog that regulates financial services		
financial information	this is information relating to your financial status, including salary/income, outgoings/expenditure, and tax status		
health information	this is information relating to your medical history, including symptoms, diagnoses, procedures and outcomes, as well as information about your height and weight. This could include previous and current or persistent medical conditions and family medical history		
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 etc		
intermediary services	these are the services we provide to you in relation to the products, which may include: <ul style="list-style-type: none"> • advising on the <i>products</i> • applying for a decision in principle or quotation on your behalf in relation to a <i>product</i> • arranging or administering a <i>product</i> on your behalf 	lenders	a mortgage lender and/or specialist mortgage distributor providing us with access to specialist lenders
		lifestyle information	this includes both work and leisure behaviour patterns. Most relevant to your <i>products</i> may be your smoker status, alcohol consumption, health, retirement age and exercise habits etc
		product	this is the mortgage, protection and/or general insurance product in respect of which we provide <i>intermediary services</i> to you (i) provided you with advice, (ii) applied for a Decision in Principle or quotation for and/or (iii) arranged or administers on your behalf
		product provider	a company which provides protection and/or general insurance products
		sanction check information	this is information relating to your politically exposed persons (PEPs) status and Her Majesty's Treasury Financial Sanctions status, which is recorded to prevent fraud and money laundering
		vulnerability	a vulnerable Client is someone who, due to their personal circumstances, is especially susceptible to detriment, particularly when an advisory firm is not acting with appropriate levels of care. These Clients are more likely to suffer severe detriment if something goes wrong. Details of vulnerability fall into the following categories: health; resilience (financial); life events; capability (financial knowledge/confidence)
		Sesame	Sesame Limited is authorised and regulated by the Financial Conduct Authority. Sesame Limited's Financial Services Register No is 150427
		Advisor	your mortgage/protection/general insurance Advisor and/or their advisory firm
		Initial Disclosure Document	the insurance or mortgage disclosure document given to you by us
		Network	any company of which we are an appointed representative prior to us joining Sesame or which they become an Appointed Representative after leaving Sesame (a network is the company responsible for making sure that sales we make to you and advice we give to you are compliant with the rules and regulations that apply to financial services in the UK)
		Payment Information	this is information that can be used to make redress/compensation payments to a person, such as bank account name, bank account number, sort code and bank branch address.