



SMART MORTGAGE GROUP LIMITED

REGISTERED OFFICE: 135 SHAKESPEARE AVENUE
HAYES MIDDLESEX UB4 0BQ

DIRECTLY AUTHORISED BY FINANCIAL CONDUCT
AUTHORITY

FCA NUMBER 301655

PRIVACY NOTICE

Privacy Notice

Who We Are

Smart Mortgage Group Limited ('we' or 'us' or 'our') gather and process your personal information in accordance with this privacy notice and in compliance with the relevant data protection Regulation and laws. This notice provides you with the necessary information regarding your rights and our obligations, and explains how, why and when we process your personal data.

Smart Mortgage Group Limited's registered office is at **135 Shakespeare Avenue Hayes Middlesex UB4 0BQ** and we are a company registered in England and Wales under company number **4710621**. We are registered on the Information Commissioner's Office Register; registration number **Z783739X**, and act as the **data controller & data processor** when processing your data. Our designated Data Protection Officer/Appointed Person is **Jay Mehta**, who can be contacted at **135 Shakespeare Avenue Hayes Middlesex UB4 0BQ Tel Number 07876753582 or 0208 5616555**.

Information That We Collect

Smart Mortgage Group Limited processes your personal information to meet our legal, statutory and contractual obligations and to provide you with our products and services. We will never collect any unnecessary personal data from you and do not process your information in any way, other than as specified in this notice.

The personal data that we collect from is: -

- Name
- Date of Birth
- Home Address
- Personal Email
- Business Email
- Home Telephone Number
- Mobile Telephone Number
- National Insurance Number
- Passport Number
- Driver's License Number
- Special Category Data (*i.e. health/medical information, details about religion, sexuality etc*)

We collect information in the below ways: -
(i.e. online form, website order etc)

How We Use Your Personal Data (Legal Basis for Processing)

Smart Mortgage Group Limited takes your privacy very seriously and we will never disclose, share, or sell your data without your consent unless required to do so by law. We only retain your data for as long as is necessary and for the purpose(s) specified in this notice. Where you have consented to us providing you with promotional offers and/or marketing, you are free to withdraw this consent at any time. ***The purposes and reasons for processing your personal data are detailed below: -***

- ***Example:*** We collect your personal data in the performance of a contract or to provide a service and to ensure that orders are completed and can be sent out to your preferred address
- ***Example:*** We collect and store your personal data as part of our legal obligation for business accounting and tax purposes
- ***Example:*** We have a legal obligation to share your personal data with [insert company name] who are a credit reference agency and provide us with financial background checks prior to you commencing employment with us
- ***Example:*** We will occasionally send you marketing information where we have assessed that it is beneficial to you as a customer and in our interests. Such information will be non-intrusive and is processed on the grounds of legitimate interests

Your Rights

You have the right to access any personal information that **Smart Mortgage Group Limited** processes about you and to request information about: -

- What personal data we hold about you
- The purposes of the processing
- The categories of personal data concerned
- The recipients to whom the personal data has/will be disclosed
- How long we intend to store your personal data for
- If we did not collect the data directly from you, information about the source

If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to do so as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.

You also have the right to request the erasure of your personal data or to restrict processing (*where applicable*) in accordance with the data protection laws; as well as to object to any direct marketing from us. Where applicable, you have the right to data portability of your information and the right to be informed about any automated decision-making we may use.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure.

Sharing and Disclosing Your Personal Information

We do not share or disclose any of your personal information without your consent, other than for the purposes specified in this notice or where there is a legal requirement. **Smart Mortgage Group**

Limited uses a third-party/third-parties to provide the below services and business functions; however, all processors acting on our behalf only process your data in accordance with instructions from us and comply fully with this privacy notice, the data protection laws, and any other appropriate confidentiality and security measures.

Safeguarding Measures

Smart Mortgage Group Limited takes your privacy seriously and takes every reasonable measure and precaution to protect and secure your personal data. We work hard to protect you and your information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures in place, **including: -measures such as SSL, TLS, encryptions, pseudonymization, restricted access, IT authentication, firewalls, anti-virus/malware etc.**

Transfers Outside the UK *(if applicable)*

Personal data in the United Kingdom is protected by the UK GDPR but some other countries may not necessarily have the same high standard of protection for your personal data. **Smart Mortgage Group Limited does** not transfer or store any personal data outside the UK.

OR;

Smart Mortgage Group Limited utilise some products or services *(or parts of them)* that may be hosted/stored in **[insert non-UK countries]**, which means that we may transfer any information which is submitted by you through the website outside the United Kingdom for the below purposes: - **[Insert what services you utilise outside the UK (i.e., website hosting, email servers, marketing database (i.e. MailChimp, Ecommerce, Email Server etc))]**

Therefore, when you **use our website/send us an email/sign up to our newsletter etc**, the personal information you submit may be stored on servers that are hosted in **non-UK countries**. Where this is the case, we will take steps to ensure that those providers use the necessary level of protection for your information and abide by strict agreements and measures set out by **Smart Mortgage Group Limited** to protect your data and comply with the relevant data protection laws.

Consequences of Not Providing Your Data *[if relying on statutory/contractual requirement basis]*

You are not obligated to provide your personal information to **Smart Mortgage Group Limited**, however, as this information is required for **us to provide you with our services/deliver your products/legitimate interests**, we will not be able to offer some/all our services without it.

Legitimate Interests *[if applicable]*

As noted in the *'How We Use Your Personal Data'* section of this notice, we occasionally process your personal information under the legitimate interests' legal basis. Where this is the case, we have carried out a thorough Legitimate Interests' Assessment (LIA) to ensure that we have weighed your interests and any risk posed to you against our own interests; ensuring that they are proportionate and appropriate.

We use the legitimate interests' legal basis for processing **purpose for processing is based on legitimate interests** and have identified that our interests are **state the legitimate interests that you are relying on**.

How Long We Keep Your Data

Smart Mortgage Group Limited only ever retains personal information for as long as is necessary and we have strict review and retention policies in place to meet these obligations. We are required under UK tax law to keep your basic personal data (*name, address, contact details*) for a minimum of 6 years after which time it will be destroyed.

Where you have consented to us using your details for direct marketing, we will keep such data until you notify us otherwise and/or withdraw your consent.

Special Categories Data *[if applicable]*

Owing to the products, services or treatments that we offer, **Smart Mortgage Group Limited** sometimes needs to process sensitive personal information (*known as special category data*) about you]. Where we collect such information, we will only request and process the minimum necessary for the specified purpose and identify a compliant legal basis for doing so.

Where we rely on your consent for processing special category data, we will obtain your explicit consent through **a signature/explicit mechanism**. You can modify or withdraw consent at any time, which we will act on immediately unless there is a legitimate or legal reason for not doing so.

If you consent to us collecting and using your **health/medical** for the purposes stated above, please sign below and print your name: -

Signature _____

Print Name: _____

Marketing *[if applicable]*

CONSENT EXAMPLE

Occasionally, **Smart Mortgage Group Limited would** like to contact you with the **specify products/services/promotions** that we provide. If you consent to us using your contact details for this purpose, you have the right to modify or withdraw your consent at any time by using the opt-out/unsubscribe options or by contacting **Smart Mortgage Group Limited directly**.

If you **consent** to us contacting you with the above-mentioned marketing and offers, please tick to say how you would like to be contacted: -

Post Email Telephone Text Message (SMS) Automated Call

LEGITMIATE INTERESTS EXAMPLE

Smart Mortgage Group Limited will occasionally send you **specify products/services/promotions** by **email/SMS/post** that have been identified as being beneficial to our customers and in our interests. Such information will be relevant to you as a customer and is non-intrusive and you will always have the option to opt-out/unsubscribe at any time.

If you would prefer **not** to receive the above-mentioned marketing and offers, please tick below: -

I wish to opt-out of marketing

Lodging A Complaint

Smart Mortgage Group Limited only processes your personal information in compliance with this privacy notice and in accordance with the relevant data protection laws. If, however you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint with the supervisory authority.

Smart Mortgage Group Limited

Mr. Jay Mehta

135 Shakespeare Avenue Hayes Middlesex UB4 OBQ

Tel Number 0208 561 6555 or Mobile Number 07876753528 or

Email Address: jay@smartmortgagegroup.co.uk

Information Commissioner's Office

Wycliffe House, Water Lane, Wilmslow SK9 5AF

Telephone: 0303 123 1113 (*local rate*) or 01625 545 745 (*national rate*)

Fax: 01625 524 510

Email: enquiries@ico.org.uk