

## How your personal information is used by Foundation Home Loans

Your information will be held by Paratus AMC Limited which trades as Foundation Home Loans. More information on the Foundation Home Loans can be found at [www.foundationhomeloans.co.uk](http://www.foundationhomeloans.co.uk)

We are unable to consider your application to join our intermediary partners' panel and submit mortgage business unless we collect your personal information as part of your registration. We will use your information to manage our relationship with you effectively.

## How we use your personal information

This privacy notice is to let you know how we look after your personal information. This includes what you tell us about yourself, what we learn by having you as a customer, and the choices you give us about what marketing you want us to send you. This notice explains how we do this; tells you about your privacy rights and how the law protects you.

## Our Privacy Promise

We promise:

- To keep your data safe and private.
- Not to sell your data.
- To give you ways to manage and review your marketing choices at any time.

## Data Protection Law

This notice sets out most of your rights and how the law protects you.

Who we are

- Foundation Home Loans is a trading style of Paratus AMC Limited.
- Our registered Office is 5 Arlington Square, Downshire Way, Bracknell, Berkshire RG12 1WA.
- Paratus AMC Limited is authorised and regulated by the Financial Conduct Authority. Our registration number is 301128.
- You can find out more about us at [www.foundationhomeloans.co.uk](http://www.foundationhomeloans.co.uk)
- Or you can call us on 0344 770 8032
- Or write to:
  - The Data Protection Officer
  - Foundation Home Loans
  - 5 Arlington Square
  - Downshire Way
  - Bracknell
  - RG12 1WA

## How the law protects you

As well as our Privacy Promise, your privacy is protected by law. This section explains how that works.

Data Protection law says that we are allowed to use personal information only if we have a proper reason to do so. This includes sharing it outside Foundation Home Loans. The law says we must have one or more of these reasons:

- To fulfil a contract we have with you, or
- When it is our legal duty, or
- When it is in our legitimate interest, or
- When you consent to it.

There are certain pieces of information which are considered to be special categories of data. We will only record them if they are relevant to the management of your account (for example, if you have a medical condition which means you require a bespoke communication approach) and we will not record this information without your explicit consent. You are able to withdraw this consent at any time, just get in touch.

A legitimate interest is when we have a business or commercial reason to use your information. But even then, it must not unfairly go against what is right and best for you.

We have a legitimate interest in telling you about our products, services and any new developments that we think may interest you but only where we are permitted to do so. We will also invite participation in promotions, prize draws and competitions from time to time.

For some marketing activity we will need to ask for your consent to use your information.

Below we set out a list of all the ways that we may use your personal information, and which of the reasons we rely on to do so. This is also where we tell you what our legitimate interests are.

<b>What we use your personal information for:</b>	<b>Our reasons</b>	<b>Our legitimate interests</b>
<ul style="list-style-type: none"> <li>• To manage our relationship with you or your business.</li> <li>• To develop new ways to meet our customers' needs and to grow our business.</li> <li>• To develop and carry out marketing activities.</li> <li>• To study how our customers use products and services from us and other organisations.</li> <li>• To provide advice or guidance about our products and services.</li> </ul>	<ul style="list-style-type: none"> <li>• Your consent.</li> <li>• Fulfilling contracts.</li> <li>• Our legitimate interests.</li> <li>• Our legal duty.</li> </ul>	<ul style="list-style-type: none"> <li>• Keeping our records up to date, working out which of our products and services may interest you and telling you about them.</li> <li>• Developing products and services, and what we charge for them.</li> <li>• Defining types of customers for new products or services.</li> <li>• Seeking your consent when we need it to contact you.</li> <li>• Being efficient about how we fulfil our legal duties.</li> </ul>
<ul style="list-style-type: none"> <li>• To develop and manage our brands, products and services.</li> <li>• To test new products.</li> <li>• To manage how we work with other companies that provide services to us and our customers.</li> </ul>	<ul style="list-style-type: none"> <li>• Fulfilling contracts</li> <li>• Our legitimate interests.</li> <li>• Our legal duty.</li> </ul>	<ul style="list-style-type: none"> <li>• Developing products and services, and what we charge for them.</li> <li>• Defining types of customers for new products or services.</li> <li>• Being efficient about how we fulfil our legal and contractual duties.</li> </ul>
<ul style="list-style-type: none"> <li>• To deliver our products and services.</li> <li>• To make and manage customer payments.</li> <li>• To manage fees, charges and interest due on customer accounts.</li> <li>• To collect and recover money that is owed to us.</li> <li>• To manage and provide treasury and investment products and services.</li> </ul>	<ul style="list-style-type: none"> <li>• Fulfilling contracts</li> <li>• Our legitimate interests</li> <li>• Our legal duty.</li> </ul>	<ul style="list-style-type: none"> <li>• Being efficient about how we fulfil our legal and contractual duties.</li> <li>• Complying with regulations that apply to us.</li> </ul>

What we use your personal information for:	Our reasons	Our legitimate interests
<ul style="list-style-type: none"> <li>To detect, investigate, report, and seek to prevent financial crime.</li> <li>To manage risk for us and our customers.</li> <li>To obey laws and regulations that applies to us.</li> <li>To respond to complaints and seek to resolve them.</li> </ul>	<ul style="list-style-type: none"> <li>Fulfilling contracts</li> <li>Our legitimate interests</li> <li>Our legal duty.</li> </ul>	<ul style="list-style-type: none"> <li>Developing and improving how we deal with financial crime, as well as doing our legal duties in this respect</li> <li>Complying with regulations that apply to us.</li> <li>Being efficient about how we fulfil our legal and contractual duties.</li> </ul>
<ul style="list-style-type: none"> <li>To run our business in an efficient and proper way.</li> <li>This includes managing our financial position, business capability, planning, communications, corporate governance, and audit.</li> </ul>	<ul style="list-style-type: none"> <li>Our legitimate interests.</li> <li>Our legal duty.</li> </ul>	<ul style="list-style-type: none"> <li>Complying with regulations that apply to us.</li> <li>Being efficient about how we fulfil our legal and contractual duties.</li> </ul>
<ul style="list-style-type: none"> <li>To exercise our rights set out in agreements or contracts.</li> </ul>	<ul style="list-style-type: none"> <li>Fulfilling contracts.</li> </ul>	

## Groups of Personal Information

We use many different kinds of personal information, and group them together like this.

Types of personal information	Description
<b>Financial</b>	Your financial position, status and history.
<b>Contact</b>	Where you live and how to contact you.
<b>Socio-Demographic</b>	This includes details about your work or profession, nationality, education and where you fit into general social or income groupings.
<b>Transactional</b>	Details about payments to and from your accounts with us, and insurance claims you make.
<b>Contractual</b>	Details about the products or services we provide to you.
<b>Locational</b>	Data we get about where you are, such as may come from your mobile phone, the address where you connect a computer to the internet, or when you pay our fees with your card.
<b>Behavioural</b>	Details about how you use our products and services.
<b>Technical</b>	Details on the devices and technology you use.
<b>Communications</b>	What we learn about you from letters, emails, and conversations between us.
<b>Social Relationships</b>	Your family, friends, and other relationships.
<b>Open Data and Public Records</b>	Details about you that are in public records such as the Electoral Register, and information about you that is openly available on the internet.
<b>Usage Data</b>	Other data about how you use our products and services.
<b>Documentary Data</b>	Details about you that is stored in documents in different formats, or copies of them. This could include things like your passport, drivers licence, or birth certificate.
<b>Special types of data</b>	<p>The law and other regulations treat some types of personal information as special. We will only collect and use these types of data if the law allows us to do so:</p> <ul style="list-style-type: none"> <li>Racial or ethnic origin</li> <li>Religious or philosophical beliefs</li> <li>Trade union membership</li> <li>Genetic and bio-metric data</li> <li>Health data including gender</li> <li>Criminal convictions and offences</li> </ul>
<b>Consents</b>	Any permissions, consents, or preferences that you give us. This includes things like how you want us to contact you, or whether you prefer large-print formats.
<b>National Identifier</b>	A number or code given to you by a government to identify who you are, such as a National Insurance number.

## Where we collect personal information from

We may collect personal information about you (or your business) from these sources:

### Data you give to us:

- When you apply for our products and services
- When you talk to us on the phone, including recorded calls and the notes we make which relate to these calls
- When you use our websites or mobile applications
- In emails and letters
- In insurance claims or other documents
- Any financial information you provide to us during the course of your dealings with us
- In customer surveys
- If you take part in our competitions or promotions.

### Data we collect when you use our services.

This includes the amount, frequency, type, location, origin and recipients:

- Payment and transaction data.
- Profile and usage data. This includes the profile you create to identify yourself when you connect to our internet, mobile and telephone services. It also includes other data about how you use those services. We gather this data from devices you use to connect to those services, such as computers and mobile phones, using cookies and other internet tracking software (See Cookie Notice).

### Recording phone calls

We may monitor or record phone calls with you in case we need to check we have carried out your instructions correctly, to resolve queries or issues, for regulatory purposes, to help improve our quality of service, and to help detect or prevent fraud or other crimes.

Conversations may also be monitored for staff training purposes.

We may also use interactive voice recognition technology to help us manage your account and provide you with the services you require.

### Using information on social networking sites

As part of our ongoing commitment to understanding our customers better, we may research comments and opinions made public on social networking sites such as Twitter and Facebook.

### Data from third parties we work with:

- Companies that introduce you to us
- Financial advisers
- Card associations e.g. Mastercard, Visa
- Credit reference agencies

- Insurers
- Retailers
- Comparison websites
- Social networks
- Fraud prevention agencies
- Payroll service providers
- Land agents
- Public information sources such as Companies House
- Loyalty scheme operators
- Agents working on our behalf
- Market researchers
- Solicitors
- Accountants
- Government and law enforcement agencies. (UK and Overseas)

#### **Who we share your personal information with**

- Agents and advisers who we use to help run your accounts and services, collect what you owe, and explore new ways of doing business
- HM Revenue & Customs, regulators and other authorities (UK and Overseas)
- Other companies within the Paratus AMC Limited Group
- UK Financial Services Compensation Scheme
- Credit reference agencies
- Fraud prevention agencies
- Collection agents
- Employers (for example, for referencing)
- Any party linked with you or your business's product or service
- Companies we have a joint venture or agreement to co-operate with
- Organisations that introduce you to us
- Companies that we introduce you to
- Market researchers
- Independent Financial Advisors
- Price comparison websites and similar companies that offer ways to research and apply for financial products and services
- Companies you ask us to share your data with.
- Sharing where we are under a legal obligation to do so to comply with any legal regulations, good governance or to enforce or protect our rights , property, safety or that of our customers or those we have business relationships with
- Our contracted third-party suppliers e.g. solicitors, surveyors, valuers, insurers, loss adjusters etc. with whom we have an agreement which will restrict how they are able to process your personal data

We may need to share your personal information with other organisations to provide you with the product or service you have chosen:

- If you use direct debits, we will share your data with the Direct Debit scheme.

- If you apply for insurance through us, we may pass your personal or business details to the insurer, and onto any reinsurers.
- If you make an insurance claim, information you give to us or the insurer may be put on a register of claims. This will be shared with other insurers.
- If you have a secured loan or mortgage with us, we may share information with other lenders who also hold a charge on the property.

We may also share your personal information if the make-up of Paratus AMC Limited changes in the future:

- We may choose to sell, transfer, or merge parts of our business, or our assets. Or we may seek to acquire other businesses or merge with them.
- During any such process, we may share your data with other parties. We'll only do this if they agree to keep your data safe and private.
- If the change to our Group happens, then other parties may use your data in the same way as set out in this notice.

### **How we use your information to make automated decisions**

We sometimes use systems to make automated decisions based on personal information we have – or are allowed to collect from others – about you or your business. This helps us to make sure our decisions are quick, fair, efficient and correct, based on what we know or have been provided with. These automated decisions can affect the products, services or features we may offer you now or in the future, or the price that we charge you for them. Here are the types of automated decision we make:

#### **Pricing**

We may decide what to charge for some products and services based on what we know.

#### **Tailoring products and services**

We may place you in groups with similar customers. These are called customer segments. We use these to study and learn about our customers' needs, and to make decisions based on what we learn. This helps us to design products and services for different customer segments, and to manage our relationships with them.

#### **Detecting fraud**

We use your personal information to help decide if your personal or business accounts may be being used for fraud or money-laundering. We may detect that an account is being used in ways that fraudsters work. Or we may notice that an account is being used in a way that is unusual for you or your business. If we think there is a risk of fraud, we may stop activity on the accounts or refuse access to them.

#### **Approving credit**

We use a rules based system to decide whether to lend money to you or your business, when you apply for a mortgage. We use historic data to assess how you're likely to act while paying back any money you borrow. This includes data about similar accounts you may have had before.

We use data from three sources:

- Your application form
- Credit reference agencies
- Data we may already hold.

We make an overall assessment based on this and to help make responsible lending decisions that are fair and informed.

### **Your rights**

Your personal data is protected by legal rights, which include your rights to:

- Object to our processing of your personal data;
- Request that your personal data is erased or corrected;
- Request access to your personal data.
- You can ask that we do not make our decision based on the automated score alone.
- You can object to an automated decision, and ask that a person reviews it.

For more information or to exercise your data protection rights please, please contact us using the contact details above.

### **Credit Reference Agencies (CRAs)**

We carry out credit and identity checks when you apply for a product or services for you or your business. We may use Credit Reference Agencies to help us with this.

If you use our services, from time to time we may also search information that the CRAs have, to help us manage those accounts.

We will share your personal information with CRAs and they will give us information about you. The data we exchange can include:

- Name, address and date of birth
- Credit application
- Details of any shared credit
- Financial situation and history
- Public information, from sources such as the electoral register and Companies House.

We'll use this data to:

- Assess whether you or your business is able to afford to make repayments
- Make sure what you've told us is true and correct
- Help detect and prevent financial crime
- Manage accounts with us
- Trace and recover debts
- Make sure that we tell you about relevant offers.

We will go on sharing your personal information with CRAs for as long as you are a customer. This will include details about your settled accounts and any debts not fully repaid on time. It will also include details of funds going into the account, and the account balance as well as details of your repayments and whether you repay in full and on time.

The CRAs may give this information to other organisations that want to check credit status. We will also tell the CRAs when you settle your accounts with us.

When we ask CRAs about you or your business, they will note it on your credit file. This is called a credit search. Other lenders may see this and we may see credit searches from other lenders.

If you apply for a product with someone else, we will link your records with theirs. We will do the same if you tell us you have a spouse, partner or civil partner – or that you are in business with other partners or directors.

You should tell them about this before you apply for a product or service. It is important that they know your records will be linked together, and that credit searches may be made on them.

CRAs will also link your records together. These links will stay on your files unless one of you asks the CRAs to break the link. You will normally need to give proof that you no longer have a financial link with each other.

You can find out more about the CRAs on their websites, in the Credit Reference Agency Information Notice. This includes details about:

- Who they are
- Their role as fraud prevention agencies
- The data they hold and how they use it
- How they share personal information
- How long they can keep data
- Your data protection rights.

Here are links to the information notice for each of the three main Credit Reference Agencies we use:

[Callcredit](#)

[Equifax](#)

[Experian](#)

### **Fraud Prevention Agencies (FPA)**

We may need to confirm your identity before we provide products or services to you or your business. Once you have become a customer of ours, we will also share your personal information as needed to help detect fraud and money-laundering risks. We use Fraud Prevention Agencies to help us with this.

When we and fraud prevention agencies process your personal data, we do so on the basis that we have a legitimate interest in preventing fraud and money laundering, and to verify identity, in order to protect our business and to comply with laws that apply to us. Such processing is also a contractual requirement of the services or financing you have requested. A legitimate interest is when we have a business or commercial reason to use your information. This must not unfairly go against what is right and best for you.

We, and fraud prevention agencies, may also enable law enforcement agencies to access and use your personal data to detect, investigate and prevent crime.

Fraud prevention agencies can hold your personal data for different periods of time, and if you are considered to pose a fraud or money laundering risk, your data can be held for up to six years.

We will use the information to:

- Confirm identities
- Help prevent fraud and money-laundering
- Fulfil any contracts you or your business has with us.

We or an FPA may allow law enforcement agencies to access your personal information. This is to support their duty to detect, investigate, prevent and prosecute crime.

### **The information we use**

These are some of the kinds of personal information that we use:

- Name
- Date of birth
- Residential address
- History of where you have lived
- Contact details, such as email addresses and phone numbers
- Financial information
- Information relating to your or your businesses products or services
- Employment details
- Vehicle details
- Data that identifies computers or other devices you use to connect to the internet. This includes your Internet Protocol (IP) address.

### **Automated decisions for fraud prevention**

The information we have for you or your business is made up of what you tell us and data we collect when you use our services or from third parties we work with.

We and FPAs may process your personal information in systems that look for fraud by studying patterns in the data. We may find that an account is being used in ways that fraudsters work. Or we may notice that an account is being used in a way that is unusual for you or your business. Either of these could indicate a possible risk of fraud or money-laundering.

As part of the processing of your personal data, decisions may be made by automated means. This means we may automatically decide that you pose a fraud or money laundering risk if:

- Our processing reveals your behaviour to be consistent with that of known fraudsters or money launderers; or is inconsistent with your previous submissions; or
- You appear to have deliberately hidden your true identity.

You have rights in relation to automated decision making: if you want to know more please contact us using the details above.

### **How this can affect you**

If we or an FPA decide there is a risk of fraud, we may stop activity on the accounts or block access to them. FPAs will also keep a record of the risk that you or your business may pose.

This may result in other organisations refusing to provide you with products or services, or to employ you.

### **Data transfers out of the EEA**

Whenever fraud prevention agencies transfer your personal data outside of the European Economic Area, they impose contractual obligations on the recipients of that data to protect your personal data to the standard required in the European Economic Area. They may also require the recipient to subscribe to 'international frameworks' intended to enable secure data sharing.

### **Sending data outside of the EEA**

We will only send your data outside of the European Economic Area ('EEA') to:

- Follow your instructions.
- Comply with a legal duty.
- Work with our agents and advisers who we use to help run your accounts and services.

If we do transfer information to our agents or advisers outside of the EEA, we will make sure that it is protected in the same way as if it was being used in the EEA. We'll use one of these safeguards:

- Transfer it to a non-EEA country with privacy laws that give the same protection as the EEA. Learn more [on the European Commission Justice website](#).
- Put in place a contract with the recipient that means they must protect it to the same standards as the EEA. Read more about this here [on the European Commission Justice website](#),
- For data sent to the USA, transfer it only 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. It makes sure those standards are similar to what is used within the EEA. You can find out more [about data protection on the European Commission Justice website](#).

### **If you choose not to give personal information**

We may need to collect personal information by law, or under the terms of a contract we have with you.

If you choose not to give us this personal information, it may delay or prevent us from meeting our obligations. It may also mean that we cannot perform services needed to run your accounts or policies. It could mean that we cancel a product or service you have with us.

Any data collection that is optional would be made clear at the point of collection.

### **Marketing**

Foundation Home Loans may use your personal information to tell you about our relevant products and offers. We may contact you about products or services we offer by post, electronic mail, telephone, SMS text messaging, and any other online or interactive media. This is what we mean when we talk about 'marketing'.

We can only use your personal information to send you marketing messages if we have either your consent or a 'legitimate interest'. That is when we have a business or commercial reason to use your information. It must not unfairly go against what is right and best for you. We study the personal information we have for you when you use our services (as stated above) to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you. You can contact us at anytime and ask us to stop using your personal information in this way.

Whether you consent to receiving marketing information or you ask us to stop sending you information, you'll still receive important information from us such as any changes to your existing products and services.

We may ask you to confirm or update your choices, if you take out any new services with us in future. We will also ask you to do this if there are changes in the law, regulation, or the structure of our business.

If you change your mind you can update your marketing preferences at any time by contacting us by email at [enquiries@foundationhomeloans.co.uk](mailto:enquiries@foundationhomeloans.co.uk) or by phone on 0344 770 8032.

### **How long we keep your personal information**

We will keep your personal information for as long as you are a customer of Foundation Home Loans.

After you stop being a customer, we may keep your data for up to 5 years for one of these reasons:

- To respond to any questions or complaints.
- To show that we treated you fairly.
- To maintain records according to rules that applies to us.

We may keep your data for longer than 5 years if we cannot delete it for legal, regulatory or technical reasons. We may also keep it for research or statistical purposes. If we do, we will make sure that your privacy is protected and only use it for those purposes.

### **How to get a copy of your personal information**

You can access your personal information we hold by writing to us at this address:

The Data Protection Officer  
Foundation Home Loans  
5 Arlington Square  
Downshire Way  
Bracknell  
RG12 1WA

Or, contact us by email at [enquiries@foundationhomeloans.co.uk](mailto:enquiries@foundationhomeloans.co.uk) or by phone on 0344 770 8032.

### **Letting us know if your personal information is incorrect**

You have the right to question any information we have about you that you think is wrong or incomplete. Please contact us if you want to do this.

If you do, we will take reasonable steps to check its accuracy and correct it.

### **What if you want us to stop using your personal information?**

You have the right to object to our use of your personal information, or to ask us to delete, remove, or stop using your personal information if there is no need for us to keep it. This is known as the 'right to object' and 'right to erasure', or the 'right to be forgotten'.

There may be legal or other official reasons why we need to keep or use your data. But please tell us if you think that we should not be using it.

We may sometimes be able to restrict the use of your data. This means that it can only be used for certain things, such as legal claims or to exercise legal rights. In this situation, we would not use or share your information in other ways while it is restricted.

You can ask us to restrict the use of your personal information if:

- It is not accurate.
- It has been used unlawfully but you don't want us to delete it.
- It not relevant any more, but you want us to keep it for use in legal claims.
- You have already asked us to stop using your data but you are waiting for us to tell you if we are allowed to keep on using it.

If you want to object to how we use your data, or ask us to delete it or restrict how we use it or, please contact us by email at [enquiries@foundationhomeloans.co.uk](mailto:enquiries@foundationhomeloans.co.uk) or by phone on 0344 770 8032.

### **How to withdraw your consent**

You can withdraw your consent at any time. Please contact us by email at [enquiries@foundationhomeloans.co.uk](mailto:enquiries@foundationhomeloans.co.uk) or by phone on 0344 770 8032 if you want to do so.

If you withdraw your consent, we may not be able to provide or maintain certain business relationships or services to you. If this is so, we will tell you.

### **How to complain**

Please let us know if you are unhappy with how we have used your personal information. You can contact us by

➤ **By Telephone**

You can call us on 0344 770 8030 or

➤ **By Email**

Email us at [ConsumerAffairs@foundationhomeloans.co.uk](mailto:ConsumerAffairs@foundationhomeloans.co.uk).

➤ **In Writing**

You can write to us at:

Customer Relations Manager  
Foundation Homeloans  
5 Arlington Square  
Downshire Way  
Bracknell  
Berkshire RG12 1WA

You also have the right to complain to the Information Commissioner's Office. Find out on their website how to [report a concern](#).

### **Formats for sharing data**

You have the right to get your personal information from us in a format that can be easily re-used. You can also ask us to pass on your personal information in this format to other organisations.

### **Cookies**

To find out more about cookies and we use them please see our Cookie Notice.