

## Data Privacy Notice

### **1. Introduction**

When you carry out transactions, or contact us to make an enquiry or a complaint, Amber Homeloans Ltd collects personal data about you.

This Privacy Notice details the types of personal data we collect either from you or from others, what we do with it, who we share it with, how long we keep it and your rights.

It does not extend to any external websites you may access from this site. You should check with other organisations about how they use your personal data.

When we refer to 'we', 'our', 'us' in this Privacy Notice we mean Amber Homeloans Ltd which for Data Protection purposes is the Data Controller.

### **2. Personal data we collect about you**

The type of personal data we collect about you and how it is used depends on what you contact us about, your needs, the relationship you have with us, the mortgage you hold or enquire about, and a range of other circumstances.

In some cases the personal data we collect about you may reveal more sensitive data defined by data protection regulations as 'special category' (for example your ethnic or racial origin, health, political opinions, religious or philosophical beliefs, trade union membership, sex life or sexual orientation and genetics or biometrics). We also collect personal data relating to criminal convictions (including pending convictions, bankruptcy/receivership, county court judgements, court records and pending orders). This will be limited to what's needed. We will only collect and use this special category personal data when we have to in order to meet a legal obligation, with your explicit consent, or where we believe you or another person may be at risk.

<b>2.1 Personal data we collect in general</b>	<b>We use this to:</b>
Name, title, address, contact details (including any previous changes), date of birth and/or age	<ul style="list-style-type: none"><li>- identify you</li><li>- manage your relationship with us</li></ul>
Lifestyle, social and family details, for example location, web browsing history, marital status, next of kin and dependants	<ul style="list-style-type: none"><li>- understand your circumstances and needs</li><li>- assess the suitability of the mortgage you have with us</li><li>- manage your experience with us</li></ul>
Telephone voice recording, your mobile phone location, IP and/or MAC address where known	<ul style="list-style-type: none"><li>- provide a record of the dealings and conversations you have with us</li><li>- understand your needs</li><li>- manage your experience with us</li><li>- protect you and provide security</li><li>- provide colleague training to help improve the quality of our service</li><li>- meet regulatory requirements</li><li>- use for crime and fraud prevention purposes</li></ul>

Nationality and national identifiers, for example national insurance, passport and driving licence numbers	<ul style="list-style-type: none"> <li>- identify you</li> <li>- meet Her Majesty's Revenue &amp; Customs (HMRC)</li> <li>- use for crime and fraud prevention purposes</li> </ul>
Details of the mortgage you hold with us, and or other organisations including financial details, for example balance, transactions, how you operate the accounts and services	<ul style="list-style-type: none"> <li>- assess the suitability of the mortgage you already hold</li> <li>- manage your relationship, with us</li> </ul>

<b>2.2 Additional personal data we collect in relation to mortgages</b>	<b>We use this to:</b>
Property details and occupancy status, for example current and previous properties you have lived at, other properties you own, whether you are an owner, tenant or living with parents	<ul style="list-style-type: none"> <li>- understand your circumstances and needs</li> <li>- assess the suitability of services you apply for or have with us</li> <li>- use for crime and fraud prevention purposes</li> </ul>
Employment details including your salary, other income and status, for example employed, self-employed, retired	<ul style="list-style-type: none"> <li>- understand your circumstances and needs</li> <li>- verify the data you provide</li> <li>- assess the suitability of services you apply for or have with us</li> <li>- use for crime and fraud prevention purposes</li> </ul>
Additional financial details relating to other income, outgoings and spending habits, for example benefit entitlement and income, rental income, credit, loans, debts	<p>To:</p> <ul style="list-style-type: none"> <li>- understand your circumstances and needs</li> <li>- assess the suitability and affordability of services you apply for or have with us</li> <li>- assess how you manage account payments and credit</li> <li>- use for crime and fraud prevention purposes</li> </ul>
Criminal convictions, pending convictions bankruptcy/receivership, county court judgements court records and pending orders	<p>To:</p> <ul style="list-style-type: none"> <li>- assess the suitability of services you apply for or have with us</li> <li>- use for crime and fraud prevention purposes</li> </ul>

<b>2.3 Additional personal data we collect in relation to mortgage advice</b>	<b>Why we collect this</b>
Property details & occupancy status, for example owner, tenant, living with parents	<p>To:</p> <ul style="list-style-type: none"> <li>- understand your circumstances and needs</li> <li>- assess the suitability of services you apply for or have with us</li> <li>- provide mortgage advice and recommendations</li> </ul>

Employment details including your salary, other income and status, for example employed, self-employed, retired	To: <ul style="list-style-type: none"> <li>- understand your circumstances and needs</li> <li>- verify the data you provide</li> <li>- assess the suitability of services you apply for or hold</li> <li>- provide mortgage advice and recommendations</li> </ul>
Additional financial details relating to your financial position. This includes details of any pensions, investments, life policies, your spending habits, debts and regular and adhoc income and outgoings etc.	To: <ul style="list-style-type: none"> <li>- understand your circumstances and needs</li> <li>- assess the suitability and affordability of services you apply for or have with us</li> <li>- provide mortgage advice and recommendations</li> </ul>
Details relating to your financial attitudes and aspirations including attitude to risk, investment goals, plans and priorities	To: <ul style="list-style-type: none"> <li>- understand your circumstances, needs and attitude to risk</li> <li>- assess the suitability and affordability of services you apply for or have with us</li> <li>- provide mortgage advice and recommendations</li> </ul>
Lifestyle, social and family details, for example location, web browsing history, marital status, next of kin, dependants, health, medical and smoker history	To: <ul style="list-style-type: none"> <li>- understand your circumstances and needs</li> <li>- assess the suitability of services you apply for or hold</li> <li>- provide appropriate mortgage advice and recommendations</li> </ul>

<b>2.4 Additional personal data we collect in relation to insurance</b>	<b>We use this to:</b>
Property details	<ul style="list-style-type: none"> <li>- ensure we can take out appropriate cover if we become aware you do not have insurance in place</li> </ul>

### **3. Who we share data with and why**

There are times when we need to share your personal and special category (sensitive) personal data with others. We will only do this where data protection law allows it, or where you have asked us to. We will limit the data shared to what is needed and will ensure appropriate security measures are taken in order to protect you and keep your data safe and secure.

To find out more about the types of organisations and/or individuals we share personal data with and why see below:

<b>3.1 Others who we share personal data with in general</b>	<b>We share personal data with them to:</b>
Your authorised representatives, for example family members, attorney	<ul style="list-style-type: none"> <li>- deal with their enquiries and requests</li> <li>- manage the ongoing administration of your account</li> <li>- process transactions</li> </ul> <p>We will only do this where:</p> <ul style="list-style-type: none"> <li>- they are authorised to provide information and operate the account without you being present</li> <li>- we already hold authority for them</li> </ul>
Joint account holders, including former, current and/or future potential account holders and trustees	<ul style="list-style-type: none"> <li>- deal with their enquiries and requests</li> <li>- manage the ongoing administration of your joint accounts</li> <li>- process transactions</li> </ul> <p>We will only do this where:</p> <ul style="list-style-type: none"> <li>- the data is data in common to all account holders</li> <li>- they are authorised to operate the account without you (for example either or any account holder is authorised to operate and transact on the account rather than both or all)</li> </ul>
Financial Advisers	<ul style="list-style-type: none"> <li>- review and assess your suitability and application for contract variations</li> </ul> <p>We will only do this when you have authorised them to act on your behalf.</p>
Solicitors, licensed conveyancers, valuers, panel managers and other professional advisers	<ul style="list-style-type: none"> <li>- provide professional services</li> <li>- manage your ongoing relationships</li> <li>- administer and manage disputes and/or legal claims</li> </ul>
Financial organisations	<ul style="list-style-type: none"> <li>- review and assess your suitability and application for services</li> <li>- manage payments (including the use of payment services involving the transfer of electronic payments on to your account) and transactions</li> <li>- respond to requests for the postponement of a charge on your property</li> <li>- use for crime and fraud prevention purposes</li> <li>- assist with enquiries and investigations</li> </ul>
Our parent firm – Skipton Building Society	<ul style="list-style-type: none"> <li>- manage your relationships and experience with us</li> <li>- provide and improve our security and systems and protect you</li> </ul>

	<ul style="list-style-type: none"> <li>- support any joint Group reporting requirements to our regulators</li> <li>- use for crime and fraud prevention purposes</li> <li>- accounting and credit risk purposes</li> <li>- insurance purposes</li> <li>- for the provision of support services, including compliance, internal audit, legal, data protection and operational risk</li> </ul>
Other companies in the Skipton Building Society Group	<ul style="list-style-type: none"> <li>- for asset management purposes</li> </ul>
Third party mortgage service provider	<ul style="list-style-type: none"> <li>- provide support in administering your account and, for the provision of regulated mortgage advice</li> </ul>
Mailing houses and printers	<p>provide you with:</p> <ul style="list-style-type: none"> <li>- service information (for example account statements)</li> <li>- a range of other communications about our services</li> </ul>
Information Technology service providers	<ul style="list-style-type: none"> <li>- provide third party systems, storage, software and application support.</li> </ul>
Credit reference agencies	<ul style="list-style-type: none"> <li>- verify your identity</li> <li>- review and assess your suitability and affordability for products and services</li> <li>- trace your whereabouts if we have been unable to contact you</li> </ul>
Fraud prevention agencies	<ul style="list-style-type: none"> <li>- carry out checks for the purposes of preventing fraud and money laundering</li> <li>- verify your identity</li> <li>- review and assess your suitability for products and services.</li> </ul>
Law enforcement agencies including police forces, private investigators, security organisations and prosecuting authorities	<ul style="list-style-type: none"> <li>- assist with any ongoing investigations relating to the security and/or safety of individuals</li> <li>- use for crime and fraud prevention purposes.</li> </ul>
Courts and tribunals	<ul style="list-style-type: none"> <li>- respond to court and tribunal requests</li> <li>- manage and resolve complaints, disputes and/or legal claims.</li> </ul>
Ombudsmen and regulatory organisations, for example Financial Ombudsman Service, Financial Conduct Authority, Prudential Regulation Authority, Financial Services Compensation Scheme, Information Commissioners Office	<ul style="list-style-type: none"> <li>- provide our regulatory and governing bodies with data about our business</li> <li>- assist with enquiries, investigations, complaints and assessments.</li> </ul>
Trade associations and industry groups, for example UK Finance, Building Societies Association	<ul style="list-style-type: none"> <li>- assist with enquiries, investigations, complaints and assessments</li> <li>- develop industry standards</li> <li>- understand and predict trends in customer and financial behaviours.</li> </ul>
HMRC	<ul style="list-style-type: none"> <li>- provide information for tax reporting</li> </ul>

	<ul style="list-style-type: none"> <li>purposes</li> <li>- assist with enquiries, investigations, complaints and assessments</li> <li>- use for crime and fraud prevention purposes</li> </ul>
Central and local government departments and agencies, for example Department of Work and Pensions (DWP), Jobcentre Plus, local councils	<ul style="list-style-type: none"> <li>- confirm payments received and ongoing benefits</li> <li>- assist with enquiries, investigations, complaints and assessments</li> </ul>
Field agents, debt collection agencies, tracing agents and appointed receivers and trustees in bankruptcy	<ul style="list-style-type: none"> <li>- understand your circumstances and financial situation</li> <li>- assist in recovering debt</li> <li>- locate you when we have been unable to contact you via our usual communication channels</li> <li>- meet the law where receivers or trustees in bankruptcy have been appointed to deal with your financial affairs.</li> </ul>
Other organisations involved in handling mergers, acquisitions and other corporate transactions	<ul style="list-style-type: none"> <li>- enable the sale or purchase of all or part of our business.</li> </ul> <p>We will only do this with adequate protection and with a contract in place to protect the security and confidentiality of your information.</p>
External auditors, risk and rating agencies, for example Moodys, Fitch	<ul style="list-style-type: none"> <li>- better understand our customers including their experiences, life-stages, circumstances and needs</li> <li>- validate reports</li> <li>- facilitate the management and audit of business operations</li> <li>- perform reviews of mortgage files for secured funding transactions to enable the necessary reporting to be completed</li> <li>- assess us and other Skipton Group entities, to enable the granting of a credit rating</li> <li>- assist in meeting our legal obligations.</li> </ul>
Data modelling and risk organisations	<ul style="list-style-type: none"> <li>- understand and predict trends in customer and financial behaviours</li> <li>- support a wide range of business decision making</li> <li>- review and validate the accuracy of reports and/or model outputs from other organisations</li> </ul>

<b>3.2 Additional third parties who we share personal data with in relation to mortgages</b>	<b>We share personal data with them for them to;</b>
Credit Reference Agencies	<ul style="list-style-type: none"> <li>- Review, assess and confirm your credit worthiness</li> </ul>

	- update your payment history (including defaults, arrears and repossession hearings) with them.
Employers (current, past or prospective)	- confirm your employment and employment status and income received.
Lenders and landlords	- confirm your residency status and payment history.

<b>3.3 Additional third parties who we share personal data with in relation to insurance</b>	<b>We share personal data with them to</b>
Insurance Companies	-assist with enquiries, assessments, the provision of insurance and to administer claims.
Claims Management Companies	-assist with enquiries and the assessment of mortgage payment protection insurance.

<b>3.4 Others who we collect, use, share and hold personal data about</b>	<b>Why we collect, use, share and hold personal data about them</b>
Your authorised representatives. This includes family members, attorneys, mortgage guarantor, executors and beneficiaries	To identify them and manage our business relationship with them and to enable them to manage your accounts, products and services in line with your authorisation.
Other adults living in your mortgaged property	For them to confirm they have no claim on the property
Solicitors, licensed conveyancers, and other professional advisers	To identify them and manage our business relationship with them.
Field Agents, debt collection agents appointed receivers and trustees in bankruptcy	To identify them and manage our business relationship with them.
Employers, lenders and landlords	To identify them and obtain data about your relationship with them.

#### **4. What allows us to collect, use, share and keep your personal data: lawful basis**

We can only collect, use, share and keep your personal data when we have a lawful basis for doing so. The lawful basis will be different dependant on the relationship you have with us and what we do with your personal data.

To find out more about what the different lawful bases are, what they mean and how they affect you, see below:

<b>Lawful basis</b>	<b>More details about what this means</b>
Legal obligation	Where we are required by law to collect, use, share or keep personal data we will do so. As an organisation operating in a regulated industry we have to comply with the laws and regulations set by government bodies and our regulators. Our regulators are the Financial Conduct Authority, Prudential Regulation Authority, and for personal data the Information Commissioner's Office.

	If we are unable to meet our legal obligations we will be unable to continue with your application and provide the ongoing management of your accounts, products and services.
Contract	This is where you choose to enter into an agreement with us or make an enquiry with the intention of entering into an agreement. This includes the terms and conditions for the ongoing management of the mortgage once opened.
Legitimate business interest	This is where we or another third party has a valid interest in the personal data we collect, use, share and keep as long as it does not unduly affect you or cause you undue detriment, damage or distress. You have a right to challenge our legitimate interest if you believe we do not have a valid reason to collect, use, share or hold your data.
Consent	This is where we ask for your agreement to carry out certain activities such as marketing. You can withdraw your consent at any time.
Explicit consent	Where we collect, use, share or keep special category (sensitive) personal data we will tell you and ask for your explicit consent before we do this.
Vital interest	This is applied in very limited circumstances where we feel you or another individual may be at serious risk (for example life or death circumstances) and no other lawful basis can be applied. If we are unable to apply any other lawful basis and your or another individual's circumstances are not serious enough for us to apply vital interest, we may be unable to assist or support you in your dealings with us.

## 5. How we use your personal data

There are many reasons why we need your personal data. What personal data we need and how we use it will depend on a range of factors from what type of products and services you have with us, whether you have a sole or joint account and many more.

### 5.1 Managing your enquiry, application and ongoing account management

We will collect, use, share and keep personal data needed for us to deal with your enquiry, process your application, provide any illustrations you require, and manage the ongoing administration of your account. This includes keeping your account records up to date and contacting you when needed.

We use agencies to provide analysis, financial and behavioural insight into customers. This includes the use of predictive modelling to assess future behaviours including likelihood of defaulting on payments. These agencies help us assess customer creditworthiness and other behaviours to help take a range of business decisions. We also use the agencies to enable the management and audit of business operations including accounting to meet our legal obligation to carry out audits.



## **5.2 Decision in Principle**

We will collect, use, share and keep personal data, including relevant sensitive data, to provide you with a decision in principle if required, assess, review and process your application, and contact you when needed.

When you request a decision in principle you will be taking steps to vary the contract you have with us.

This underwriting process involves reviewing your application against our full lending criteria and the use of financial models. This is to help us better understand your mortgage application and assess the affordability of the services you apply for.

We will be unable to proceed with your mortgage application without undertaking this activity.

## **5.3 Mortgages**

We will continue to assess the ongoing performance of your mortgage once you have taken it out.

After the redemption of your mortgage, we will continue to use, share and keep your personal data for as long as required to meet our legal, regulatory or other lawful requirements. In addition data will be used for ongoing modelling to support future business decisions such as ensuring the business has appropriate capital reserves for changes in the economic environment.

### **5.3.1 Transfer of mortgage**

If you make a transfer of mortgage application, any borrower who is to be removed from the mortgage account, with our agreement, will remain on the account until our legal advisor sends us written confirmation that the transfer of the mortgaged property has been legally completed. Until we receive that confirmation, all borrowers will still be liable under the mortgage and can have access to the account details, including details of any additional lending.

Until the transfer of mortgage application has been completed, we will share data about the mortgage account, the progress of the application and the existing and new borrowers with each of them.

### **5.3.2 Adult Occupiers**

If there are other adults living in the property, who are not party to any mortgage or additional borrowing application you make, we will contact them to inform them of your application and ask them to confirm that they have no claim on the property.

### **5.3.3 Second Charge**

If we receive an application or request to postpone a charge on your property from another Charge holder, we will share data about your account, including projected balance and projected monthly payments with them.

### **5.3.3 Debt Recovery**

We share data about you and how you conduct your account (including defaults, arrears and repossession hearings) with credit reference agencies, fraud prevention agencies, solicitors, debt collection agencies and/or tracing agents acting on our behalf to assist in recovering the

debt and to locate you if we have been unable to contact you via our usual communication channels.

## **5.4 Insurance**

### **5.4.1 Mortgage Payment Protection Insurance**

We will share data with Claims Management Companies and/or Insurance Companies to assist them with their enquiries and assessment of any mortgage payment protection insurance you hold or have taken out in the past. We will only do this if they provide evidence that they have your signed authority to act on your behalf. The signed authority must be dated within 6 months of us receiving the request.

## **5.5 Identification, Credit Checking and Crime Prevention**

We process your personal data on the basis that we have a legitimate interest in preventing fraud and money laundering, and to verify identity, in order to protect business and to comply with laws that apply to us.

More information about how we use this data is below.

### **5.5.1 Credit and Identity Checks**

In order to process your application for a contract variation, we are required by law to identify you and assess the affordability of the variation you apply for. We do this by using automated systems provided by one or more credit reference agencies.

To do this, we will share your data with the credit reference agencies and they will give us data about you. This will include public data (for example from the electoral register) and other data (for example from your credit applications) about your financial situation, financial history, shared credit and specific fraud prevention data.

We will use this data to:

- identify you
- assess your creditworthiness and whether you can afford the proposed variation
- prevent criminal activity, fraud and money laundering
- manage your accounts
- trace and recover debts
- ensure any offers provided to you are appropriate to your circumstances

We will continue to exchange data about you with credit reference agencies while you have a relationship with us. We will also inform the credit reference agencies about your settled accounts. If you borrow and do not repay in full and on time, credit reference agencies will record the outstanding debt. This data may be supplied to other organisations by credit reference agencies.

When credit reference agencies carry out a search they will place a footprint on your credit file that may be seen by other lenders.

If you have a spouse or financial associate, Credit reference agencies will link your records together if they identify a link between you, so you should make sure you share this data and discuss it with them before making an application.. These links will remain on the files

until such time as you or your partner successfully files for a disassociation with the credit reference agencies to break that link.

The credit reference agency checks we carry out are a condition of the contract you take out when applying for products and services with us.

Any documents requested or provided to help prove your identity may be checked with the issuing authority and/or anyone who has certified a copy.

The information we obtain from credit reference agencies is owned by them and limited to what needed for our own purposes. We will tell you if your application is rejected because of information we have received from credit reference agencies but will not be able to provide any details. You will need to contact the credit reference agencies directly to request a full credit report if you require details of what they hold about you.

More details about which credit reference agencies we use, their role as fraud prevention agencies, what personal data they hold (including how they use and share it), their retention periods and your data protection rights with the credit reference agencies are explained in more detail in the Credit Reference Agency Data Notice (CRAIN).

The CRAIN is accessible from each of the three credit reference agencies – clicking on any of the three links below will take you to the same CRAIN document:

Callcredit [LINK [www.callcredit.co.uk/crain](http://www.callcredit.co.uk/crain)]; Equifax [LINK [www.equifax.co.uk/crain](http://www.equifax.co.uk/crain)];

Experian [LINK [www.experian.co.uk/crain](http://www.experian.co.uk/crain)].

### **5.5.2 Fraud Prevention**

We will use and share your data with fraud prevention agencies to carry out checks for the prevention of fraud, money laundering and to verify your identity.

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

The fraud prevention checks we carry out are a condition of the contract variation you apply for.

If we, or a fraud prevention agency, determine that you pose a fraud or money laundering risk, we may refuse to provide the services and/or mortgage variation you have requested.

A record of any fraud or money laundering risk will be retained by the fraud prevention agencies.

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

Data held by credit reference and fraud prevention agencies can be accessed by other financial organisations, law enforcement and government agencies and may result in others refusing to provide services, finance or employment to you.

## **5.6 Communicating with you**

We will use any of the contact details we hold for you to communicate with you about the mortgage you hold with us, contact you as requested and to send you information we are required to provide you with by law (for example account statements).

### **5.6.1 Research, Performance and Customer Relationship Management**

We use data for profiling and customer segmentation to create a broad understanding of our customers. This helps shape our communications, products and other activity. We also carry out behavioural and trend analysis, including the use of financial, behavioural and other models. In this way we can understand not only what is important to our customers now, but also predict future behaviours and needs. This includes looking at information we hold about you, or that we may have received from other sources, such as credit reference agencies.

### **5.6.2 Quality assurance and communication monitoring**

We may sometimes access your data as part of our internal Quality Assurance processes, to ensure that you have received the best and correct outcome for your situation. These monitoring activities also allow us to carry out ongoing training with our colleagues

We will record and monitor some of your contact with us, this includes telephone calls and emails. This is to help us in our continuous attempts to improve customer service and to offer additional protection and security. We also retain information for evidential purposes and to meet legal and regulatory requirements. Telephone calls, and other electronic communications may also be monitored for reasons of staff training.

## **5.7 Customers who require additional support**

We take our responsibilities to our customers seriously, especially those who may be vulnerable including the families and loved ones of bereaved customers.

### **5.7.1 Adjustments for customers needing help**

Everyone needs a little help sometimes and we want to ensure that you get the best experience from Amber Homeloans Ltd. With your consent, we will add notes to your records about any adjustments we need to make, such as using large print when we communicate with you, to ensure it's easier for you to interact with us.

## **5.8 Sale or purchase of all or part of our business**

If we sell or transfer all or part of our business, we may share or transfer customer records and data as part of the proposed/actual sale or transfer. Before we do this we will ensure there is adequate protection in place by imposing contractual obligations on the buyer/seller to ensure the security and confidentiality of your data.

## **5.9 Improvement of our systems, security and integrity**

We continually look to improve our systems, delivering change and new functionality. To ensure that these improvements are robust and suitable for use, we use customer data within our testing environments. We ensure that these activities are carried out in a secure and controlled environment.

## **5.10 Transfers outside the EEA**

If we need to transfer data outside the European Economic Area (EEA) and the country it's transferred to is not on an approved list for having adequate security controls in place, we will limit when we do this and the amount of personal data we send.

Our parent company Skipton Building Society have a subsidiary company Jade Software Corporation Limited based in New Zealand who provide us with systems and technical support. New Zealand is on a list of countries approved by The Information Commissioner's Office as having adequate security controls in place.

Organisations in the USA can sign up to the EU-US Privacy Shield which is recognised by the Information Commissioner's Office as having adequate security controls in place. When we use third party systems, application support and cloud based providers based in the USA we will use third parties who have signed up to the EU-US Privacy Shield and impose contractual obligations on them to ensure the security and confidentiality of your data.

We will also ensure that there is adequate protection in place before sending anything to other countries outside the EEA by imposing contractual obligations on the recipients to ensure the security and confidentiality of your data.

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.

## **5.11 Cookies**

We may store data about you using cookies (files which are sent by us to your computer or other device you use to access our website) which we can access when you visit our site in future. We do this to provide the online services you request, understand your needs, improve our website services and provide a better experience for you.

We use the following types of Cookies:

- Persistent to recognise you when you re-visit our site, these will remain on your computer until deleted, or until they reach a specified expiry date.
- Session to keep track of where you are whilst navigating our website, these are deleted from your computer when you close your browser
- Strictly Necessary to provide the services you have requested

We also use Google Analytics to analyse the use of this website. Google Analytics generates statistical and other information about website use by means of cookies, which are stored on users' computers. The information generated relating to our website is used to create reports

about the use of the website. Google will store this information. Google's privacy policy is available at: <http://www.google.com/privacypolicy.html>.

Most browsers allow you to reject all cookies, whilst some browsers allow you to reject just third party cookies. For example, in Internet Explorer you can refuse all cookies by clicking "Tools", "Internet Options", "Privacy", and selecting "Block all cookies" using the sliding selector. Blocking all cookies will, however, have a negative impact upon the usability of many websites, including this one.

Further information about deleting or controlling cookies is available at [www.AboutCookies.org](http://www.AboutCookies.org). Please note that by deleting our cookies or disabling future cookies you may not be able to access certain areas or features of our website.

To find out more about cookies see our [Cookies policy](#) or visit [www.AboutCookies.org](http://www.AboutCookies.org)

### 5.12 How long we keep your data

We have a records management and retention policy in place to determine how long personal data needs to be kept which is based on our legal, regulatory and business requirements. How long we keep your personal data is based on your relationship with us, and the types of mortgage and services you have with us. When determining retention periods we consider the following:

- Legal and regulatory guidance, case law and expected outcomes
- Maximum or minimum retention periods identified by the law or our regulators
- Ours and others contractual rights and obligations
- Your expectations
- Current or future operational requirements
- The cost of maintaining, storing, archiving, and retrieving the data
- Forensic requirements, for example the potential need to access data no longer actively used in order to manage or respond to complaints and disputes
- Our policies and standards
- The risks involved in retention, deletion and removal
- The capability or restraints of our systems and technology

In accordance with the payment card industry data security standard (PCI-DSS), we do not store cardholder data on our systems.

### 5.13 Your Rights

You have certain rights in relation to your personal data, not all rights apply in all cases, and these are explained in more detail below:

You have a right to:	What this means
Be informed	The purpose of this privacy notice is to do this. We also do this by giving a notice in our application forms, web pages and telephone scripts when we collect new or additional data from you. See the list below for details of the information we are required to include: <ul style="list-style-type: none"><li>• who is collecting, using, sharing and keeping your personal data</li></ul>

	<ul style="list-style-type: none"> <li>• the reason it is being collected</li> <li>• what it will be used for</li> <li>• what allows its collection, use, sharing and storing</li> <li>• how we work out how long it will be kept</li> <li>• what countries outside the European Economic Area (EEA) it will be transferred to and the security measures in place</li> <li>• what your rights are</li> </ul>
Access your personal data	We will allow you access and give you details of the personal data we hold about you including the data covered in your right to be informed above.
Have inaccurate or incomplete personal data corrected	We will correct and/or update your personal data if you inform us or we identify that it is inaccurate or incomplete.
Request erasure	<p>We will delete your personal data if:</p> <ul style="list-style-type: none"> <li>• we no longer need it for the reason(s) we told you</li> <li>• you withdraw your consent and this is the only lawful basis (as explained in section 4 of this Privacy Statement) allowing us to collect, use, share and/or keep it</li> <li>• you object and we do not have a valid business interest that does not unduly affect you or cause you undue detriment, damage or distress</li> <li>• the collection, use, sharing, keeping of it is unlawful</li> <li>• we are required by law to do so</li> </ul>
Restrict the collection use, sharing and keeping of personal data	<p>We will put on hold the collection, use, sharing and deletion of your personal data when:</p> <ul style="list-style-type: none"> <li>• its accuracy needs to be verified</li> <li>• you have objected and we need to consider if our legitimate business interest overrides your request</li> <li>• it has been collected, used, shared or kept unlawfully and you have requested that it's not deleted but want it to be restricted</li> <li>• we no longer need it but you request it to establish, exercise or defend a legal claim</li> </ul> <p>We will tell you before we remove any restrictions.</p>
Portability	<p>You can request that we move, copy and/or transfer personal data electronically to you and/or another service provider. This will allow you to take advantage of services available to help you find deals and understand your spending habits.</p> <p>We will do this in a safe and secure way, where you have made a request to us or another service provider, or when required to meet a contractual obligation.</p>
Object	You can object to the collection, use, sharing and retention of your personal data where:

	<ul style="list-style-type: none"> <li>• you feel our legitimate business interest will cause you undue detriment, damage or distress where this is the lawful purpose for collecting, using, sharing or keeping data</li> <li>• You do not agree to direct marketing (including profiling)</li> </ul>
Challenge automated decisions	We do not make decisions based on automated process because all are subject to a manual review.

### 5.13.1 Complaints

If you have any concerns about how we collect, use, share or keep your personal data, or you think there has been a breach, you can contact us to make a complaint or find out more about our complaints procedure by going to <https://www.amberhomeloans.co.uk/> or call 0345 602 0750.

If you do make a complaint we will follow our internal complaints procedure to resolve your complaint quickly and fairly. If we cannot resolve your complaint to meet your expectations, you may contact:

The Financial Ombudsman Service (FOS)  
Exchange Tower  
London  
E14 9SR  
Telephone 08000 234 567  
E-mail: [complaint.info@financial-ombudsman.org.uk](mailto:complaint.info@financial-ombudsman.org.uk)  
Web: [www.financial-ombudsman.org.uk](http://www.financial-ombudsman.org.uk)

You also have a right to complain to the Information Commissioner's office if you have any concerns about how we collect, use, share or keep your personal data by contacting them at:

Information Commissioner's Office (ICO)  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
Telephone: 0303 123 1113  
Web: [www.ico.org.uk](http://www.ico.org.uk)

## 6. Contact us

If you require any more details about how we collect, use, share and store your personal data, or about your rights and how to exercise them, please contact us:

Data Protection Officer  
Amber Homeloans Ltd  
The Bailey



Skipton  
North Yorkshire  
BD23 1DN  
Telephone: 0345 602 0750