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.

Who we are,

When we mention "Prosper Protect" "we", "us" or "our" we are referring to Prosper Protect Limited. We collect, use and are responsible for certain personal data about you. When we do so we are required to comply with data protection law, and we are responsible as a data controller of that personal data for the purposes of those laws.

The personal data we collect and use

In the course of providing our services to you and complying with our legal and regulatory obligations, we may collect the following personal information when you provide it to us:

- Personal contact details (e.g. name, telephone number, email address and address)
- Date of Birth
- Gender
- Marital status & dependants
- Government identification numbers
- Personal bank account details
- Customer compliant files
- Data about criminal convictions or offences
- Bank details

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

- From lenders and/or product providers:
  – product details
- From identification and verification checking agencies:
  – identity information & sanction check information

How we use your personal data

We will use your personal data:

1. As necessary to perform our contract with you for the services from Prosper Protect:
   A. to decide whether to enter into it;
   B. to correspond with you;
   C. to manage and perform that contract, including administering payment for our services; and
   D. to update our records.
2. As necessary for our own legitimate interests or those of other persons and organisations, e.g.:
   A. to manage legal claims (we have a legitimate interest in protecting our organisation from breaches of legal obligations owed to us and to defend ourselves from litigation. This is needed to ensure that our legal rights and interests are managed appropriately);
   B. to issue responses to press/news stories concerning services provided by us and/or complaints or legal claims made by you, in order to minimise the reputational impact on us;
   C. to perform tasks in relation to our services within our group for centralised administration purposes;
   D. to obtain feedback from you on the service you have received from us (we have a legitimate interest in operating our business. This includes ensuring that the service we provide is of a satisfactory standard);
   E. to send you marketing communications; and
   F. to engage with third party service providers with which we have referral/introducer arrangements with, in order to assess your eligibility to benefit from enhanced rates and services.
3. As necessary to comply with a legal obligation, e.g.:
   A. when you exercise your rights under data protection law and make requests; and
   B. for compliance with legal and regulatory requirements and related disclosures.
4. Based on your consent, e.g.:
   A. to refer you to third party service providers with which we have referral/introducer arrangements with, in order that you can benefit from enhanced rates and services which may be of interest to you; and
   B. to send you marketing communications where we have asked for your consent to do so.

You're free at any time to change your mind and withdraw your consent. The consequence might be that we cannot do certain things for you.

Rationale/Reason for Processing	Lawful Basis for Processing	Third party recipients linked to that activity
To provide you with intermediary services	Performance of a contract	Bankhall Support Services
To apply for Decisions in Principle (DIP) and applications for mortgage products and/or quotations and applications for protection and/or general insurance products on your behalf	Performance of a contract	Lenders and product providers
To refer you to third party advisers to provide you with advice in relation to services not otherwise offered by Prosper Protect Limited	Consent	Lenders, specialist providers, packagers and product providers
To retain records of any services or advice provided to you by us in order to defend potential legal claims or complaints	Legitimate interest	External suppliers of data storage and data hosting services to retain records on our behalf
To provide you with details of products and services form us and third parties that may be of interest to you in accordance with your preferences. For more information see 'marketing'	Consent	External suppliers, lenders, product providers and packagers

Sharing your data with third parties

Subject to applicable data protection law we may share your personal data with:

- External supplier(s) of research, technology, and insurance whose products and/or services you have access to through Prosper Protect
- Our professional indemnity insurers, legal and other professional advisers, including our insurance adviser and auditors should we need to manage legal claims
- The Financial Conduct Authority

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'

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 and then 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: 01258 792274
By email: info@prosperprotect.co.uk
By post: Prosper Protect Limited, West Barn, Wimborne Road, Blandford, Dorset, DT11 9HN

Whether information has to be provided by you, and if so why

If you do not wish us to collect and use your personal information in the ways set out in this privacy notice, it may mean that we will be unable to provide you with our products or 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 retention periods for your personal data:

- Retention in case of queries – we will retain your personal data for as long as we reasonably consider it necessary to deal with your queries (e.g., any questions you may have in relation to the services).
- Retention in case of claims – we will retain your personal data for as long as we reasonably consider that you might legally bring a claim against us.
- Retention in accordance with legal and regulatory requirements – we will retain your personal data after we have ceased providing services to you for as long as we are required/permitted to retain it for based upon our legal and regulatory obligations.

Type of Record	Retention Period
Personal contact details	For a minimum period of 5-years to comply with our regulatory obligations
Date of birth	For a minimum period of 5-years to comply with our regulatory obligations
Gender	For a minimum period of 5-years to comply with our regulatory obligations
Marital status and dependents	For a minimum period of 5-years to comply with our regulatory obligations
Government identification numbers	For a minimum period of 5-years to comply with our regulatory obligations
Financial data including credit reports	For a minimum period of 5-years to comply with our regulatory obligations

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:

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 Privacy Shield (this is a framework that sets privacy standards for data sent between the US and EU countries and it makes sure those standards are similar to the standards used within the EEA)
- the transfer will be subject to binding corporate rules (agreements governing transfers made between organisations within in 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 law 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 Europe
- 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 (e.g., 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 (i.e., 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 of 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, how long we keep it for, 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 our Data Protection Officer at info@prosperprotect.co.uk or Prosper Protect Limited, West Barn, Wimborne Road, Blandford Forum, DT11 9HN
- let us have enough information to identify you, e.g., 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 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.

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 anonymization and aggregation

Your personal data may be converted into statistical or aggregated data which can't 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). It has enforcement powers and can investigate compliance with data protection regulation. We ask that you please attempt to resolve any issues with us before the ICO.

How to contact us

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

If you wish to contact our Data Protection Officer, please send an email to info@prosperprotect.co.uk or write to, Prosper Protect Limited, West Barn, Wimborne Road, Blandford Forum, DT11 9HN