

My Life Mortgage Privacy Policy

My Life Mortgages Limited is the controller and responsible for your personal data (collectively referred to as "My Life Mortgages", "we", "us" or "our" in this privacy notice).

This website is owned and operated by My Life Mortgages Limited trading as My Life Mortgage and is intended for use by consumers in the United Kingdom. We abide by the relevant rules of the General Data Protection Regulation ("GDPR").

Our contact information:

My Life Mortgages Limited, Company number: 11491572

Waters Green House

Sunderland Street

Macclesfield

SK11 6LF

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info@mylifemortgage.com

We take the protection of your personal data very seriously. Our privacy policy explains what information we collect from you, what we do with it, how we keep it secure and the circumstances in which we provide it to third parties.

We obtain and process personal data in different ways depending upon the purpose of the processing and way in which we obtained your personal data.

In most circumstances your data will only be processed within the UK or EEA. If for any reason we need to have your data processed elsewhere we will inform you of that, any privacy risks involved and what we have done to minimise those risks.

You can at any time ask us to tell you what personal data relating to you we hold.

You also have the right to ask us to rectify your data if it is inaccurate, erase it or restrict the processing of it, in particular in regards to your right to object to processing under legitimate interests of your data for profiling and for direct marketing. In some circumstances you can ask us to provide it to you in a format which would allow you to transfer it digitally to another.

Where we have requested, and you have given us consent to process your data you may withdraw that consent at any time.

Were our business to be sold all your data would be transferred to the purchaser so that they could use it in the same way as we do now.

If you are at all concerned about our processing of your data please let us know by contacting us at info@mylifemortgage.com. You may also complain about it to the Office of the Information Commissioner ("ICO") at www.ico.org.uk.

Third-party Links

This Site may include links to third-party Sites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control over these sites and are not responsible for their privacy statements. When you leave our Site, we recommend you read the privacy notice of every Site you visit.

The Data We collect about You

"Personal data", or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- Contact Data includes address, email address and telephone numbers.
- Financial Data includes bank account details.
- Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this Site.
- Usage Data includes information about how you use our Site, products and services and page interaction information.
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific Site feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We may also collect Special Categories of Personal Data about you (this could include details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). In order to provide you with an enhanced equity release quote we must collect this type of data. Our legal basis for collecting this data is consent. Without this information we are unable to provide enhanced equity release quotations. We do not collect any information about criminal convictions and offences.

How is Your Personal Data collected

We use different methods to collect data from and about you including through:

- Direct interactions. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - use our services;
 - create an enquiry on our Site;
 - request a call back on our Site;
 - registering to use our Site;
 - searching for products;
 - entering into a competition, promotion or survey or report a problem with our Site;
 - request marketing/information to be sent to you; and
 - give us some feedback via email.
- Automated technologies or interactions. As you interact with our Site, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other Sites employing our cookies.
- Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources as set out below:
- Technical Data from analytics providers such as Google based outside the EU;
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services;
- Identity and Contact Data from data brokers or aggregators; and
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

How we use Your Personal Data

We will only use your personal data when the law allows us to. Most commonly, we will use your data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you (for example, providing information, products and services that you request from us).
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests for example, we may use your search or quotation history to send you or make available personalised offers.
- Where we need to comply with a legal or regulatory obligation.
- To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve you
- To use data analytics to improve our website, products/services, marketing, customer relationships and experiences

We rely on the basis of legitimate interest in relation to collecting and processing information in order to obtain a quote for you. It is necessary for us to share your data with our selected Regulated Partners to find the best deals for you and so that we can keep you updated with changes within the market place.

Generally, we do not rely on consent as a legal basis for processing data. However, your consent would be required in relation to processing your medical and lifestyle information in order to obtain an enhanced quote, or if sending third party direct marketing communications to you via email or text message. However, you have the right to withdraw your consent at any time by contacting us using the details outlined in this Privacy Policy.

Purpose

To process and deliver our service to you, we will connect you with our relevant Regulated Partners in order to help you find a quote for the product you are looking for. Before we do this we may call you to confirm your details and/or requirements. Once we pass you to one of our Regulated Partners they will contact you directly. They may contact you by telephone, text or email only about and directly in relation to your enquiry. You do not have to buy anything from any of our Partners. There is no obligation to purchase.

We may also call you to ask about your experience using our site and service, and your experience in dealing with the Regulated Partners with which we connected you.

We may monitor and/or record these calls for the purposes of quality control and staff training, regulatory compliance, and to resolve disputes.

Marketing

We may rely upon legitimate interest to make suggestions and recommendations to you about the goods or services that may be of interest to you. We will make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise permitted to by law)

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you (we call this marketing) This is how we decide which products, services and offers may be relevant for you. You will receive marketing communications from us if you have requested information from us or purchased goods or used our service, and in each case, you have not opted out of receiving that marketing. We will never send such messages if you have opted out.

We will get your opted-in consent before we share your personal data with any company outside of the My Life Mortgages Limited Group of companies for marketing.

Use of Cookies

We collect information about your computer, including where available your IP address, operating system and browser type using a cookie file. Cookies help us to improve our website and deliver a better and more personalised service to you. They enable us to personalise your experience on our website, speed up your searches and help us select services or materials for inclusion on the website which may be of interest to you. It also allows us to monitor general traffic patterns and usage of our website to help us to improve our website design and layout. Most browsers accept cookies automatically, but usually you can alter the settings of your browser to prevent automatic acceptance. If you choose not to receive cookies, you may not be able to use certain features of our website.

The information within these cookies is completely anonymous.

If you provide us with information about yourself by form filling on our website a session cookie collects that information and stores it during your browsing session so that if you wish to fill another of our forms it will be automatically populated. Information stored in that cookie is deleted as soon as you terminate your browsing session.

Disclosures of Your Personal Data

We may have to share your personal data with the parties set out below for the purposes set out above.

- Internal Third Parties as set out in the Glossary.
- External Third Parties as set out in the Glossary.
- Specific third parties such as our Regulated Partners.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Data Retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for a minimum period of five years after they cease being customers for regulatory purposes.

In some circumstances you can ask us to delete your data: see Your Legal Rights below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Changes to our Privacy Policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to our privacy policy.

Contact

If you have any questions regarding this privacy policy, or for any other reason, please contact us at info@mylifemortgage.com or My Life Mortgage, Waters Green House, Sunderland Street, Macclesfield, SK11 6LF.

Glossary

Lawful Basis

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

Third Parties

Internal Third Parties

Other companies in the My Life Mortgages Limited Group acting as joint controllers or processors and who are based within the United Kingdom and provide IT and system administration services and undertake leadership reporting.

External Third Parties

- Service providers and Regulated Partners acting as processors based within the United Kingdom who provide IT and system administration services.
- Professional advisers [acting as processors or joint controllers] including lawyers, bankers, auditors and insurers based within the United Kingdom who provide [consultancy, banking, legal, insurance and accounting services].
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

Your Legal Rights

You have the right to:

- Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on

this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact info@mylifemortgage.com

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within 30 days. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.