

# Customer Privacy Notice

## About us

April Mortgages Limited will be data controller of any personal data held about you and the loan(s) you have with us.

A data controller is an individual or organisation which decides how your personal data will be used. The data controller is referred to as "we", "us" and "our" in this privacy notice and includes businesses who take control of our business in the future and any other person who is for the time being entitled at law to the benefit of the loan or mortgage.

If you have any questions or require further information about this privacy notice, please contact us by post at:

April Mortgages Limited  
2<sup>nd</sup> Floor  
158-160 North Gower Street  
London  
NW1 2ND

or by email at [info@aprilmortgages.co.uk](mailto:info@aprilmortgages.co.uk)

## About you

This privacy notice applies to the following:

- A person who applies for or takes out a loan with us.
- A person who becomes or applies to become a party to an existing loan with us.
- A person whose personal data we capture during the course of an application for or the administration of a loan (including persons occupying the property which is security for the loan and professional advisers).

Within this privacy notice, each person it applies to is referred to as "you" and "your".

## Why a privacy notice is required

Applicable data protection laws (including the Data Protection Act 2018), impose obligations on us as the data controller, when we process (collect or create, hold, amend, disclose, share or otherwise use or erase/destroy) your personal data and give you, as the data subject, rights over your personal data.

We are obliged to process your personal data fairly, lawfully and in a transparent manner. This privacy notice meets that obligation by explaining what personal data we will hold about you, how we will process your personal data, why we process your personal data and the lawful grounds on which we process it. It also sets out some of your legal rights.

We may change this privacy notice in the future. If we make any changes that affect you, we will inform you of them before they take effect.

## Your legal rights

In addition to your right to be told about how your personal data is processed, you have several rights over your personal data provided to and controlled by us. These include your rights to -

- Request a copy of the personal data we hold for you - this is called the right to access.
- Request we transfer personal data we hold for you to another person - this is called the right to portability.
- Request we delete personal data we hold for you - this is called the right to erasure.
- Request we correct incomplete or inaccurate personal data we hold for you - this is called the right to rectification.
- Request our use of the personal data we hold for you is restricted - this is called the right to restriction.
- Request we stop using your personal data - this is called the right to object.
- Request we don't use automated processing to make a decision affecting you or involving profiling you - these are called rights in relation to automated decision making and profiling.

The extent of these rights is limited by law and we may not act on part or all your request(s), where the right(s) are not applicable. If we do not act on your request, we will explain our reasons for not doing so when responding to your request.

If you require any further information about how we handle your personal data in addition to the information included in this privacy notice, including details of the relevant fraud prevention agencies we use, or wish to make a request to exercise any of your rights, please contact our Data Protection Officer at the address listed in the 'About us' section.

## How we obtain your personal data

We obtain personal data about you from a variety of sources in addition to creating data about you during the application and life of the loan. Examples of these sources include:

- Your mortgage intermediary.
- Your bank or building society.
- Your employer or former employers.
- Other applicants or persons representing you (e.g. power of attorney).
- Credit reference and fraud prevention agencies.
- Solicitors, conveyancers and people working with them.
- Valuers.
- Local and national government
- Market researchers.

We may also obtain data about you from publicly available sources such as the:

- Internet.
- Land Registry.
- Electoral Register.

## What types of personal data we hold about you

We may process a range of personal data about you and those individuals and organisations connected with you including the following:

- Individual
  - Title.
  - Name (including previous name or alias).

- Address (including previous address).
- Other contact details (including email, website and telephone number).
- Sex, gender, date of birth, nationality, usernames/passwords/memorable information.
- Employment
  - Type or sources of income (e.g. employment, self-employment).
  - Current employer.
  - Salary and other forms of income from directorships and shareholdings.
- Connected individuals
  - Family members.
  - Residents of addresses (current or previous) you provide to us.
  - Advisers and representatives.
- Finances
  - Bank accounts including your payment information.
  - Properties you own.
  - Income, assets, loans, credit cards and other liabilities you may have.
  - Vehicle ownership.
- Existing accounts with us.
- Your preferred communications channels and application settings.
- IP and device fingerprints.
- Correspondence, communications and documents
  - Electronic images and data representations of identity documents, financial documents, utility bills, employment documents, legal contracts or any other correspondence received or sent.
  - Recordings of your calls to and from us.
- Results of checks we are required by law to undertake including Political Exposed Person searches, sanctions checks and criminal record checks.

### Special Category Data

This is personal data like racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health, data concerning a natural person's sex life or sexual orientation.

We do not normally need to ask or record this type of personal data, however there are some circumstances which may result in it being necessary to manage your account(s) and relationship with us. For example, assessing whether you may experience circumstances which make you vulnerable or if we need to communicate with you in a particular manner such as large print or braille versions of correspondence and information.

When special category data is required, we will request and confirm your consent unless we are legally permitted or required to do so without consent. Where we have obtained your consent, you are entitled to withdraw your consent at any time following which we will no longer continue to process this information for the relevant purpose. Please contact us using the details in the 'About us' section if you wish to withdraw consent.

### Legal grounds on which we will process your personal data

We will only process your personal data if we have a lawful reason to do so and in line with law. We rely on the following regulatory reasons when processing your personal data for the purposes set out in the 'How we use your personal data' section. We use the words in brackets to refer to these legal reasons in the 'How we use your personal data' section.

- You have consented to us processing your personal data for one or more of the specified purposes ('Consent').
- The processing is necessary to enable us to enter a contract with you ('Necessity').
- The processing is necessary to comply with our legal and regulatory obligations ('Legal Obligations').
- The purpose is necessary for our legitimate interest. \* ('Legitimate Interest')

\* Legitimate interest for processing your personal data will include to –

- Prevent crime (anti money laundering, financial and other crimes).
- Comply with our regulatory, legal and contractual obligations.
- Ensure compliance with codes of practice.
- Exercise our legal rights.
- Meet your expectations of us.
- Carry out analysis, modelling and forecasting.
- Manage risks to you and our business.
- Keep our records complete and accurate.
- Ensure our business is profitable and has adequate levels of capital and facilitate the growth of our business.

Personal data on criminal convictions will only be processed to prevent fraud, comply with our legal obligations under anti Money Laundering and Financial Sanctions Legislation.

Special category data will only be processed where it is necessary and only with your prior explicit consent, or where permitted by law to protect your well-being, defence of legal claims or when courts are acting in their judicial capacity.

## How we use your personal data (legal grounds for this use)

In this section we tell you how we use your personal data and the legal grounds for that use. In some cases, more than one legal ground may apply, in which case we list all that could be relevant.

### Loan application (*Legal grounds for this use*)

- Verifying your identity (*Necessity, Legal Obligations*).
- Evaluating whether the loan is affordable and whether a loan can be made in relation to its terms and conditions (*Legal Obligations, Legitimate Interests*).
- Credit assessment and scoring to be able to judge your likelihood of repaying the loan (*Legitimate Interests*).
- Processing fees and payments towards the loan (*Necessity*).
- Communicating with your mortgage intermediary / broker to progress the application (*Necessity*).
- Undertaking a physical or automated valuation of the security or associated properties which you or a business of which you are a director, partner, or shareholder own, in order to assess the loan size, appropriateness as security or overall affordability (*Legitimate Interests*).
- Communicating with our professional advisers (including solicitors and conveyancers) to ensure that the appropriateness of the property or properties as security for the loan and any terms of our mortgage are met (*Legitimate Interests*).

- To obtain information about you we consider necessary that is either publicly available, or from you, persons representing you, mortgage intermediary or broker, lenders, bank/building society, credit reference agency, accountants, employers (current/past), landlords, Land Registry, Companies House, tax authorities, fraud and crime prevention agencies (*Necessity, Legitimate Interests*).

#### Managing our relationship with you and administering the loan (*Legal grounds for this use*)

- Locating, contacting and corresponding with you (*Necessity, Legal Obligations*).
- Identifying circumstances which may make you vulnerable so that we can take account of this in our dealings with you (*Legitimate Interests*).
- Processing and managing repayments towards the loan (*Necessity*).
- Processing and managing charges and interest due on the loan (*Necessity*).
- Informing and making arrears management decisions. Including obtaining or providing information about your to or from debt management companies (*Necessity, Legitimate Interests*).
- Collecting and recovering any money owing to us (*Necessity*).
- Obtaining or providing information about you to or from another lender who may have a charge or interest in the property which is a security for the loan (*Necessity, Legal Obligations*).
- Ensuring that we have a valid and enforceable charge over property which is, or is intended to be, security for the loan, with the priority we expected and that the title to that property is and continues to be good and marketable (*Necessity, Legitimate Interests*).
- Exercising our rights under the terms of our loan including obtaining possession of the property and if we do, to sell the property subject to our charge (*Necessity, Legitimate Interests*).
- Appointing a receiver if the loan is secured on a property that the borrower doesn't live in (*Necessity, Legitimate Interests*).
- Correcting inaccurate data held by us and/or third parties (*Necessity, Legitimate Interests, Legal Obligations*).
- Improving the accuracy and quality of the data held by us and/or third parties (*Necessity, Legitimate Interests, Legal Obligations*).
- Monitoring and analysing the performance of your loan with us (*Legitimate Interests*).
- Updating you about products and services offered by us which we think may be of interest to you (*Consent, Legitimate Interests*).

#### Identifying and preventing financial crime (*Legal grounds for this use*)

- Preventing, detecting and investigating financial crime including fraud, bribery, suspected money laundering, corruption and other crime. (*Necessity, Legal Obligations, Legitimate Interests*)

#### Ensuring we comply with our legal, contractual and regulatory obligations, codes of practice, and to be able to run our business (*Legal grounds for this use*)

- Paying fees to intermediaries and introducers of business to us in addition to providing them with information on their performance (*Necessity, Legal Obligations, Legitimate Interests*).
- Complying with legal obligations imposed on us (*Legal Obligations*).
- Seeking advice from our advisers (*Legitimate Interests*).
- Managing our resources, risk and business performance (*Legitimate Interests*).
- By sharing data about you and the operation of the loan during its term and after it is repaid with:
  - Regulators and Bank of England.

- Trade and other statutory bodies.
  - Our investors or prospective investors and their advisers (*Legal Obligations, Legitimate Interests*).
  - Prospective purchasers of us or organisations we seek to purchase, merge with us including their representatives (*Legitimate Interests*).
  - Any person or organisation including their representatives who wishes to acquire your mortgage involving the sale, assignment, transfer or disposal of all or part of any loan and associated rights (*Legitimate Interests*).
  - Any person who was previously the lender or who has an interest in the loan and their representatives (*Legitimate Interests, Legal Obligations*).
  - Credit reference and fraud prevention agencies (*Legitimate Interests, Legal Obligations*).

Develop and improve our products and services (*Legal grounds for this use*)

- Testing our products and services including training staff to ensure we meet a high standard of service (*Legitimate Interests*).
- Obtaining feedback on existing products and services we offer (*Consent, Legitimate Interests*).
- Market research for the improvement or introduction of new products and services (*Consent, Legitimate Interests*).

Analysis, modelling and forecasting (*Legal grounds for this use*)

- Predicting your economic situation and future behaviour (*Legitimate Interests*).
- Modelling the performance of your loan and loans to others that could be made in the future (*Legitimate Interests*).

Complaints and dispute management (*Legal grounds for this use*)

- Documenting facts and evidence to enable investigating and responding to complaints and disputes, allowing us to offer the highest standard of service (*Necessity, Legal Obligations, Legitimate Interests*).

Marketing (*Legal grounds for this use*)

- Contacting you (in accordance with your selected preferences) about our product and services via:
  - Post.
  - Email.
  - Telephone.
  - SMS.
  - Online or interactive media. (*Consent, Legitimate Interests*).

We may record and/or monitor calls for the purpose of:

- Monitoring service quality and training.
- Investigating and/or resolving queries.
- Preventing crime and fraud (*Legitimate Interests, Legal Obligations*).

## Who we share your data with

We may share your personal data with

- You, other applicants of the loan, persons representing you including your mortgage intermediary, solicitor and accountant.
- Companies which your mortgage intermediary / broker is associated with.
- Any other person you ask us to provide information to.
- Your present employers.
- Your and our insurers.
- Your bank, building society and landlord.
- Credit reference and fraud prevention agencies.
- Our bank, BACS and the Direct Debit Scheme.
- Any occupier of the property and other persons who have or may have an interest in any property which is or is intended as security for a loan.
- The freehold owner or management company of any leasehold property that is security for the loan and their representatives.
- Our advisers including valuers, solicitors, conveyancers, accountants and auditors.
- Law of Property Act receivers.
- Central and local government.
- The Financial Ombudsman Service, courts and any arbitrator or adjudicator of a dispute involving us.
- Statutory and regulatory bodies including tax authorities, HMRC, Information Commissioner's Office, Prudential Regulation Authority, Financial Conduct Authority, European Central Bank and Bank of England.
- Law enforcement agencies.
- Market research companies.
- Our investors, prospective investors and their advisers or any business with which we are seeking to acquire, merge with, or divest any part of our business to, and their advisers.
- Any person who takes or is about to acquire in any way all or part of our interest in, or any of our rights under or in respect of, or all or some of our obligations in respect of your loan or mortgage (including your application or offer where not complete), and any outstanding balance.
- Any previous lender.
- Organisations involved in any corporate finance transaction which we undertake or intend to undertake, including underwriters, loan servicers, trust managers and security trustees.
- Third party service providers such as any loan servicing organisation we outsource to.

## Making automated decisions

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 money laundering or known fraudulent conduct, 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.

If we, or a fraud prevention agency, determine that you pose a fraud or money laundering risk, we may refuse to provide the services or financing you have requested, or to employ you, or we may stop providing existing services to you.

A record of any fraud or money laundering risk will be retained by the fraud prevention agencies, and may result in others refusing to provide services, financing or employment to you. If you have any questions about this, please contact us on the details above.

You may ask us to conduct a human review of any decision based on automation that we have made taking account of any additional information you wish to provide, by contacting us.

We also use automation for the purposes of identify verification, income verification, expenditure verification, property valuations and evaluating affordability.

## How long we will hold your data for

We will usually keep your personal data for 7 years from the later of:

- Date a loan application is made.
- Date a loan application is withdrawn or declined.
- Date a loan is repaid.

We may retain the data for longer where it is necessary for us to do so to meet our legal or regulatory obligations, or for research purposes or technical reasons.

## Credit Reference Agencies

In order to process your loan application, we will perform credit and identity checks on you with one or more credit reference agencies, by providing them your personal data and getting data about you from them. The data provided by credit reference agencies will typically include information from your credit application and about your financial situation and financial history. Credit reference agencies will provide us shared credit, financial situation, financial history and fraud prevention information. The information will be used to:

- Verify your identity and income.
- Assess your creditworthiness, loan affordability (ensuring the product is appropriate for your circumstance) and risk of the terms of conditions of the loans being breached.
- Prevent fraud and anti-money laundering.
- Trace and recover debts.

We will continue to exchange information about you with credit reference agencies while you have a relationship with us, including informing the credit reference agencies about your settled accounts. If the loan is not repaid in full and on time, the credit reference agencies will record the outstanding debt and that information may be provided to other organisations.

When credit reference agencies receive a search request from us, they will place a search footprint on your credit file that may be seen by other lenders.

If you are making a joint application, or tell us that you have a spouse, partner or financial associate, we will link your records together. You should discuss and share this with them before starting the application. Credit reference agencies will also link your records together and these links will remain on your and their files until such time as you or your financial associate successfully files for a disassociation with the credit reference agencies to break that link.

The Credit Reference Agency Information Notice (CRAIN) is accessible from each of the three credit reference agencies below.

TransUnion: [callcredit.co.uk/crain](https://callcredit.co.uk/crain)

Experian: [experian.co.uk/crain/index.html](https://experian.co.uk/crain/index.html)

Equifax: [equifax.co.uk/crain](https://equifax.co.uk/crain)

## Fraud Prevention



Before we provide services, goods or financing to you, we undertake checks for the purposes of preventing fraud and money laundering, and to verify your identity. These checks require us to process personal data about you.

The personal data you have provided, we have collected from you, or we have received from third parties will be used to prevent fraud and money laundering, and to verify your identity.

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

Details of the personal information that will be processed include, for example: name, address, date of birth, contact details, financial information, employment details, device identifiers including IP address and vehicle details.

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 process your personal data on the basis that we have a legitimate interest in preventing fraud and money laundering and to confirm your identity. This allows us to protect our business and to comply with laws that apply to us. This processing is also a contractual requirement of any of our products and services that you use. The personal information we have collected from you will be shared with fraud prevention agencies who will use it to prevent fraud and money-laundering and to verify your identity. If fraud is detected, you could be refused certain services, finance, or employment.

To find out more about our Fraud Prevention Agencies and how they manage your information, please visit each agency directly:

CIFAS – [cifas.org.uk/fpn](https://cifas.org.uk/fpn)

National Hunter – [nhunter.co.uk/privacypolicy](https://nhunter.co.uk/privacypolicy)

Fraud prevention agencies may transfer your personal data outside of the UK. This may be to a country where the UK Government has decided that your data will be protected to UK standards, but if the transfer is to another type of country, then the fraud prevention agencies will ensure your data continues to be protected by ensuring appropriate safeguards are in place.

### **Opting out of providing us with your personal data**

If you choose not to give us the information requested for submitting a loan or mortgage business, it may impact our ability to effectively manage our relationship with you.

### **Sending your personal data outside the United Kingdom and the European Economic Area**

Your personal data may be processed or transferred outside the United Kingdom and the European Economic Area.

If you require further information as to where your personal data is transferred to, and the measures we have implemented to safeguard that information, please contact us on detail above.

### **How to complain**

If you are unhappy with the outcome of your requests to exercise your rights, or how we handle your personal data then please let our Data Protection Officer know.

You are also entitled to complain to the Information Commissioner's Office:

Information Commissioner's Office



mortgage more simple

Wycliffe House  
Water Lane  
Wilmslow  
Cheshire SK9 5AF  
Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)  
Tel: 0303 123 1113

