Privacy Notice

About Us
Logic Mortgage Solutions is committed to protecting the privacy and confidentiality of all individuals and takes its responsibilities regarding the security of data very seriously. We abide by the rules of the General Data Protection Regulation (GDPR) upheld by the Information Commissioner Officer (ICO – Reference number ZA556907) and are authorised and regulated by the Financial Conduct Authority (FCA) to advise on and arrange Mortgage and general protection products. This includes processing any personal data lawfully, fairly and in a transparent manner.

What information do we collect about you and why?
As a Brokerage and as part of our service we will only collect information from you so that we can advise on and arrange Mortgage and general protection products that maybe suitable for you. In the financial services industry, we call this factfinding which provides us with all the information that we need from you in order to provide you a with suitable product that meets your circumstances and requirements.

When obtaining information from you we will do this by phone, email or post and will confirm the accuracy of the data collated. It is important that all the data we hold on you is accurate so that we can advise and arrange suitable products to you.

The types of information we will collect from you includes; contact details, occupation, income and expenditure, credit details, mortgage requirements, insurance requirements, existing policies, solicitors/accountants details, bank details. In addition, we may collect sensitive personal data such as medical conditions or criminal offence data where required to do so to arrange a policy on your behalf.

Where you provide your personal data on our website it will be taken as a positive action that you would like us to contact you for the purpose as set out on our website.

Contact details received from a third-party lead generator
Occasionally we may receive your contact details from a third-party lead generator who you have expressed an interest in the products/service we have to offer. Where we use lead generators, we will request from them that they have obtained your consent and have made it clear to you that they will pass your details on to a firm such as ours and that you will be expecting us to contact you.

Information from other sources
We may obtain information from other sources such as public records, if required. This is to enable us to verify who you are or facts that you have told us are accurate.

As part of verifying your identification we use Veriphy which is a well-known identification source. Once this check has been completed it will be held on your file to evidence that we have verified who you are. If you would like to know more about the search please do not hesitate to contact us.

How will we use this information?
We will only use your data in ways that you would reasonably expect us to. Below summarises how we will use your data.

We will use the information you provide to us to research the market on your behalf to find a suitable policy that meets your circumstances and needs. Once we have carried out research we will provide you with a personalised quotation or illustration detailing the product information. Whilst you consider the quotation or illustration, we will remain in touch to answer any questions you may have.

If you are happy to proceed we will then use your data to complete an application form which will then be forwarded to the relevant Lender or Insurer. We will then liaise with them on your behalf until the policy has been arranged.

We will then contact you at renewal or when your policy is due to be reviewed so that we can continue to ensure that the policy you have in place remains suitable. Where your circumstances or personal information have changed we will update our records and notify the Lender or Insurer to do the same.

We will also use your data to assist you handle any claim you have on your policy or with handling a complaint if you are not happy with the service you have received.

As part of our service we like to keep our customers up to date with new products or offers that are available and maybe of interest. Therefore, we may contact you from time to time through email marketing, phone, text or other types of marketing material. If you wish to opt out of this at any point then please let us know.

In the interest to improve our services, telephone calls may be monitored and/or recorded for training purposes and to assist us handle a complaint. Where we record the call you will be informed of this.

The lawful basis on which we use this information
How we use your information (detailed above) we will do so using the lawful basis legitimate interests. We have decided upon this basis as it allows us to meet with the ICO and FCA rules and is the most suitable lawful basis for processing data with a view to arranging a policy.

Who will it be shared with?
As stated above, if you wish to proceed to take out a mortgage or policy then we will pass your details on to the Lender or Insurer the mortgage or policy will be arranged with. The information we pass on will be detailed within the application we complete on your behalf. We may also liaise with your Solicitor and/or Accountant where relevant to arrange a product on your behalf.

If you have been introduced to us via a Builder or Estate/Property Agent then we may provide them with updates on the progress of your application, where applicable.

Where required we may forward your details onto regulatory authorities or fraud agencies where we have a legal obligation to do so to comply with our regulatory requirements or where fraud is suspected. We may do this under the lawful basis legal obligation.

Use of Third-Party Processors and International Data Transfers
We use Claude, an artificial intelligence tool provided by Anthropic PBC ("Anthropic"), to assist with internal compliance document review. In doing so, certain personal data contained within client documents may be processed by Anthropic on our behalf.

Anthropic acts as a data processor and processes this data solely on our instructions and for no other purpose. Anthropic is based in the United States, which means your personal data may be transferred outside the United Kingdom. This transfer is safeguarded by Anthropic's Data Processing Addendum, which incorporates the UK Addendum to the EU Standard Contractual Clauses, issued by the Information Commissioner's Office under Section 119A(1) of the Data Protection Act 2018. Anthropic is contractually prohibited from using your personal data for its own purposes and maintains appropriate technical and organisational security measures in accordance with UK GDPR requirements.

What we will do to ensure the security of personal information
We will not share any of the information you provide to third parties for marketing purposes or store any of your information outside of the European Economic Area other than when processed using Anthropic (as outline in the above paragraph). The information you provide will be held securely by us regardless of whether the information is in electronic or physical format. We use leading technologies and security measures to safeguard your information and keep strict security standards to prevent any unauthorised access to it.

How long will we retain your data
We will only hold data for no longer than is necessary. Where we have arranged a policy on your behalf, we will keep your file including your personal data and any call recording, on record for a minimum of six years, in line with our regulatory obligation with the FCA. Where we need to hold your file for longer than this then we will inform you of this.

What are your rights?
You have the right to:

- ✓ Be informed about how we use, share and store your personal information;
- ✓ Request access to the personal data we hold on you (also known as a Subject Access Request (SAR)). Where a SAR is requested we will respond promptly and within one month from the date we receive the request;
- ✓ Request your personal data is amended if inaccurate or incomplete;
- ✓ Request your personal data is erased where there is no compelling reason for its continued processing and we don't have a legitimate interest to retain it;
- ✓ Request that the processing of your data is restricted;
- ✓ The right to object to your personal data being processed;
- ✓ Rights in relation to automated decision making and profiling.

Where the processing of your data is based on your consent, you have the right to withdraw this consent at anytime by contacting us by phone or email. We do not use automated decision making or profiling systems.

Marketing
Where we need your consent, we will ask for this separately. We do not use pre-ticked boxes or make assumptions that you have given your consent. Your consent must be freely given by positively opting in or making a clear affirmative action that you are giving your consent. We will do our very best to ensure you know exactly what you are consenting to and remind you that you may withdraw your consent at anytime by contacting us by email or phone. Where consent is obtained a record of this will be made confirming what you have consented to, the time and date and how consent was obtained.

Customers: Our customers are important to us however we appreciate that on some occasions you may wish to look elsewhere. If you do, we would like to stay in touch and therefore will ask for your consent in order for us to do so.

Potential Customers: Where you have expressed an interest in a product but have then decided not to proceed we would like to keep in touch therefore will ask for your consent to do so in case a product maybe of interest to you at a later date.

Non-Customers: We will only send you information about regulated products or services if we have obtained your consent to do so.

Right to complain
We hope that the service you receive from us is to the high standard you would expect. If at any point you are unhappy with the way we have used your data then please notify: Jonathan White by either email, post or phone below. If you remain concerned about the way we collect or use your personal data you can raise your concern with the Information Commissions Office (ICO) on 0303 123 1113. For further details you may visit the ICO website www.ico.org.uk

We will tend to disclose the complainants identity to whoever the complaint is about, however if you wish your identity to remain anonymous, we will try to respect that. We will keep your complaint on record for two years once closed or six years if it also relates to how we arranged a policy and falls under the FCA ruling.

Changes to the information
We regularly review and, where necessary update our Privacy Notice. If we plan to use personal data for a new purpose our Privacy Notice will be updated, and you will be notified.

How to contact us
If you wish to contact us about the above or any other matter, then please contact us at:

Jonathan White
Logic Mortgage Solutions
The Marlowe Innovation Centre
Marlowe Way
Ramsgate
Kent
CT12 6FA
Tel: 01843 263 200
Email: jwhite@logicmortgagesolutions.co.uk
Website: www.logicmortgagesolutions.co.uk