WADE FINANCE LTD

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# Privacy Notice

This notice explains how we use your personal information when we advise on and arrange mortgages and buildings and contents insurance. If you give us details about someone else, such as a joint applicant, please share this notice with them.

## 1. Who we are

Wade Finance Ltd is the controller of your personal information. Registered in England and Wales, company no. 04622117. Address: 40 Wanderdown Road, Brighton BN2 7BT. ICO registration no. Z813465X. Contact: Lucie Wade, Director, lucie@wadefinance.co.uk. We are not required to appoint a Data Protection Officer.

## 2. What we collect and where from

- Identity and contact details, including ID documents
- Financial details: income, employment, outgoings, bank statements, credit history, existing mortgages
- Property details, existing insurance and claims history
- Unspent criminal convictions, only where an insurer asks for this to quote
- Health or personal circumstances, only if you choose to tell us so we can support you, and only with your explicit consent

We collect this from you and any joint applicant, including when you phone us. With your agreement we may also obtain it from lenders, insurers, credit reports, your solicitor, estate agent, employer or accountant, and public registers such as HM Land Registry and Companies House. If you mention health or personal circumstances on a call, we will ask for your consent before keeping it on your file.

## 3. Why we use it and our lawful basis

| Purpose | Lawful basis |
|---|---|
| Answering your calls and enquiries; advising on, recommending and arranging your mortgage and home insurance | Contract, or steps you ask us to take before one |
| Identity and anti-money laundering checks; FCA record keeping and reporting | Legal obligation |
| Compliance checks; handling complaints and legal claims; reminders when your deal or policy is due to end | Legitimate interests: running a compliant business and keeping you on a suitable deal |
| Telling you about our similar mortgage and home insurance services | Legitimate interests (soft opt-in). You can opt out at any time: see section 8 |
| Health or support information | Explicit consent (UK GDPR Art 9(2)(a)). You can withdraw it at any time |

| Purpose | Lawful basis |
|---|---|
| Criminal conviction information for insurance quotes | UK GDPR Art 10 and DPA 2018 Schedule 1 (insurance purposes), under our Appropriate Policy Document |

We need this information to advise you and arrange your mortgage or insurance. If you don't provide it, we may not be able to help, and a lender or insurer may decline your application or cancel your policy.

## 4. Who we share it with

- Lenders and insurers you apply to, and the platforms we use to source and arrange them
- Solicitors, surveyors, valuers and estate agents involved in your case
- Caspian, only if you ask us to refer you for life, income protection or critical illness cover. Caspian then becomes responsible for your information and will give you its own privacy notice
- Our compliance support provider, for file checks
- The FCA, Financial Ombudsman Service, HMRC or law enforcement where the law requires
- IT providers that process data for us under contract (case management, sourcing software, cloud storage, e-signature, email, messaging and telephone answering). They may only use it on our instructions

We never sell your information. Lenders and insurers make their own decisions, which may include credit scoring and automated decisions. They are separate controllers and will give you their own privacy notice. We do not make automated decisions about you.

## 5. Artificial intelligence

We use AI tools to help research products and prepare documents. We do not enter your name, date of birth, address, account numbers or other details that identify you into these tools. When you phone us, your call may be answered by an AI telephone assistant, which takes a written summary of your enquiry or message. Calls are not recorded. The assistant does not give advice or make decisions. Every recommendation is made and checked by Lucie Wade.

## 6. Where your information is stored

Your information is stored in the UK or the European Economic Area. If any provider transfers it elsewhere, we make sure it is protected by UK adequacy regulations or ICO-approved contract terms.

## 7. How long we keep it

| Record | Retention period |
|---|---|
| Mortgage and insurance advice files | 10 years after our last service to you |
| Identity and anti-money laundering checks | 5 years after our relationship ends, then deleted |
| Enquiries and call summaries that do not go ahead | 2 years from last contact |
| Marketing opt-out | Kept so we don't contact you again |

We keep information longer only if a complaint, legal claim or legal requirement means we must.

## 8. How we contact you

We will contact you about your case by email, phone, text and WhatsApp. Tell us if you prefer one method. Please send documents through our secure client portal, not WhatsApp.

We may also send you occasional information about our similar mortgage and home insurance services by email, text or WhatsApp. To opt out, tell us now, reply STOP, or email us at any time. Opting out is free and won't affect our service to you.

## 9. Your rights

You can ask us to give you a copy of your information, correct it, delete it, restrict our use of it, or transfer it to you or another organisation in a portable format. You can withdraw any consent you have given.

**Right to object:** you can object to our use of your information based on legitimate interests, and you can object to marketing at any time and we will stop.

Requests are free, and we will respond within one month. For complex requests this can be extended by up to two more months, and we will tell you if so.

## 10. Complaints

Please contact us first. We will acknowledge your complaint within 30 days, look into it properly and tell you the outcome without undue delay. You can also complain to the Information Commissioner's Office at ico.org.uk or on 0303 123 1113.