

## Legal Information

This Notice sets out what information we will collect about you and how we use and protect that information.

If you have any questions about this, don't hesitate to get in touch. We'll be more than happy to help.

This Notice applies to the processing of personal data of all applicants who are party to the loan application. You are confirming that all applicants agree to the conditions set out in this Notice and that you have permission to provide personal data on behalf of all applicants.

This notice also applies to the processing of personal data of third parties who are not party to any loan application and who are acting on the customer's behalf. Further information about the processing of 'Third party data can be found in the 'Third parties' section below.

This Notice was last updated 10 January 2024. We may make changes to this Notice from time to time and any changes will be published on our website. If we make any significant changes to the way we use your personal information that may impact your data rights, we will notify you.

This Notice, and your access to and use of our website is governed by and interpreted in accordance with the laws of England and Wales.

Information and terms regarding the use of our website and our cookie policy can be found on our website at <https://www.theloansengine.co.uk/website-cookie-policy/>

All calls are recorded for training and monitoring purposes.

## About Central Loans Limited

The Loans Engine is a trading name of Central Loans Limited. We are a broker not a lender and are authorised and regulated by the Financial Conduct Authority for regulated mortgage and consumer credit activity.

- Registered in England and Wales 4205508
- Registered Office: 25-27 Surrey Street, Norwich, NR1 3NX
- Registered with the Information Commissioner's Office - Registration number Z5775723
- Financial Conduct Authority - Firm Reference Number 708606
- VAT number 765 3535 12

Central Loans Limited is a member of the Association of Finance Brokers (AFB). For more information, visit their website: [www.theafb.net](http://www.theafb.net)

## What information do we collect about you?

During the use of our live website we may collect:

- your name, contact details and basic application information provided to us via an online enquiry or during the use of our live chat function; and
- information about your use of our website including, pages visited, how you reached the website and your IP address, through the use of cookies placed on your browser.

Further information on the use of cookies and our website can be found in our [Website & Cookie Policy](#).

During the loan enquiry / application process, we may collect personal and financial information from you including (but not limited to):

- the content of communications received by letter, email, SMS or telephone;
- name, address history & contact information (telephone number(s) and email addresses);
- date of birth, marital status & nationality;

- property details and value (including 2<sup>nd</sup> homes and Buy-to-lets where relevant);
- household Income, employment type and history;
- details about your monthly expenditure, financial circumstances and requirements; and
- credit and mortgage information including credit reference agency data.

## Special categories of data

We do not request 'special categories' of data (health / medical records, etc...) during the application process, however, if sensitive information is provided to us, we will ask for your explicit consent prior to recording it. As part of application process, we may invite you, on a voluntary basis, to disclose information that would enable us to assist you in the loan process to make informed borrowing decisions, and to ensure the lenders lending decision is informed and responsible.

## How do we collect the information about you, and who provides it?

Your data may be provided to us by:

- You or any other applicants through our online application, phone calls, emails and / or in the form of physical documents;
- Introducing partners, whose websites you may have visited in order to make an enquiry;
- Your introducing financial adviser or mortgage broker, acting on your behalf; or
- The lender(s) who we have approached in connection with arranging your loan.

Alternatively, we may request your personal data from relevant third parties, for example; property surveyors, existing mortgage providers, your financial adviser/mortgage broker and Credit Reference Agencies (CRA).

## Why do we collect your information and how will we use it?

1. **In order to provide our service** – (in legal speak, as a necessity to **perform our contract with you**), we will process your personal data to:
  - Assess eligibility and suitability of loan products offered by lenders on our panel;
  - Process your application and arrange its completion;
  - Carry out credit reference agency searches;
  - Submit application information to prospective lenders who will conduct their own credit reference agency search in order to assess eligibility for their products ;
  - Keep your Introducer (if any) informed about the progress of your loan application.

Such processing is a requirement of the service we provide in sourcing and arranging the finance you have requested. If you do not agree to how we will use your information we will not be able to provide our service.

2. **In order to comply with the laws and regulations that apply to TLE**, for example:
  - to inform fraud prevention and/or law enforcement agencies where fraud or money laundering is identified or suspected; or
  - to obtain or retain appropriate records, for example evidence of:
    - suspected fraud or money laundering;
    - mortgage advice;
    - proof of your identity (electronic or physical);
    - complaints investigations and outcomes.

3. **In the course of running our business** – (in legal speak, where we have a **legitimate interest** to do so i.e. processing that isn't strictly necessary for providing our service but is important for us as a business), including:
  - to improve our products and services;
  - to record and respond to complaints;

- to generate statistical analysis and research;
- to facilitate your use of our websites, including enquiring about services via our websites; and
- where applicable, to contact and inform you of the end of your loans initial rate period.

**4. Where you have given your consent** - we will ask for your consent:

- to allow us to keep you informed about service and products and updates to them;
- to collect and process sensitive personal data relevant to your application;
- to transfer your data to trusted partners who we may refer you to if we cannot help.

**5. Where there is a vital interest to do so** – in other words we may pass your information onto relevant agencies such as the Police where we believe there is a risk to life.

## Credit searches

When you enquire, we carry out our own credit search and credit searches on behalf of prospective lenders via their own systems. This allows us to obtain eligibility decisions and accurate rate information to generate your loan quote.

All searches at this stage are ‘soft’ searches and do not affect your credit rating. These searches are recorded as “SQ” Search Quotation that you will be able to see on your credit report. Other credit providers will not be able to consider these searches when deciding whether to offer you credit in the future. The CRA will record details of the search whether or not your application proceeds.

If you proceed with your application, we will conduct a secondary search of the CRA. This allows us to verify your identity electronically. This search will appear as ‘ID’ on your credit report and also does not affect your credit rating.

Once your application has been approved in principle, signed paperwork received and the application has been formally submitted to the lender, an ‘Application Search’ or ‘hard’ search will be conducted by the lender. This application search can affect your credit rating as it may be taken into account by other credit providers. In certain circumstances, for example if you decide to proceed with a different lender during the application process, it may be necessary to complete more than one application search.

Where you have made an enquiry in joint names with a spouse or financial associate and we have carried out a credit search, a financial association will be created between the applicants if one does not already exist.

CRA data will be used by us to verify your identity, assess product suitability and your eligibility for loans we offer. Lenders may also use the information in assessing your application, to manage your account and recover debts.

The information, shared between us and the CRAs, about you and those with whom you are linked financially, may be used to trace and recover debts, and prevention of criminal activity.

Further information on how CRAs use, store and retain personal data and how to contact them, can be found at <https://www.equifax.co.uk/crain.html>.

## Who might we share your information with?

### Prospective Lenders

We will share some or all of the information obtained during the application process with prospective lenders in order to assess your eligibility and process your application to completion. This may include information that has not specifically been requested by the lender but will be provided because it may impact the lender's decision to lend. A list of prospective lenders can be found in our ‘Terms of Business’ or on our website.

Where your personal data has been shared with a lender they will process the data in line with the conditions of this notice, including, conducting credit searches, assessing your eligibility for their products and verifying your identity. Full details of how they process your personal data can be found in the lenders' own privacy notices. You can find links to our lenders websites and privacy notices on our dedicated webpage:

<https://www.tle.co.uk/about-us/our-lenders/>

## **Third Parties to obtain information relevant to your loan application**

We may need to contact your mortgage provider, property surveyors, accountant, and/or any other relevant third party, in order to gather information that we need to support your application as required by a lenders' criteria. The information that is provided to each lender is limited to only what is required to grant the information request.

## **Credit reference agencies (CRAs)**

We will provide your personal data to credit reference agencies to obtain credit and electoral roll information required to verify your identity and assess your eligibility for loan products available through the lenders on our panel. We only provide CRAs with your name, address (including previous addresses) and date of birth in order for them to supply us with your credit file.

## **Fraud prevention agencies**

If you give us false or inaccurate information, if we suspect or identify fraud, we will record this and may pass this information to fraud prevention agencies and other organisations involved in crime and fraud prevention.

Whenever fraud prevention agencies transfer your personal data outside of the European Economic Area, they impose contractual obligations on the recipients of that data to protect your personal data to the standard required in the European Economic Area. They may also require the recipient to subscribe to 'international frameworks' intended to enable secure data sharing.

## **Introducers and financial advisors**

We will keep your introducer (if applicable) informed of the progress of your application. We will also share information requests and documentation relating to the application with any financial advisor or mortgage broker that is acting on your behalf.

## **Trusted referral partners**

With your consent, we may transfer your data to trusted partners who we may refer you to if we cannot help.

## **Third party service providers**

To help us fulfil contracts and to pursue our legitimate interests, we may share your personal information with third parties who process data on our behalf in order to provide services such as:

- **Independent review platforms**

We may ask you to provide feedback upon successful completion of your loan application using a third party online provider. We only provide them with your name and email address in order to provide you with a link to the feedback service.

- **Digital marketing platforms**

We use an automated marketing platform to manage and send promotional email communications (where you have consented to this). Some of our suppliers of these services transfer personal data (names and email addresses) outside the EEA. Where such a transfer is not to a country regarded as having adequate data protection laws, the transfer is subject to appropriate safeguards, in the form of contractual obligations, in respect of the personal data concerned.

- **Website live chat**

We use a UK based third party platform to deliver our Live Chat service to handle customer enquiries through our website in real time. The platform also provides temporary storage of your data which may include your name, email address, phone number and the content of any conversation via live chat. Further information regarding how they process and store data can be viewed [on their website](#).

- **SMS communications**

We use a third party platform to facilitate the sending and receiving of SMS (text) messages and the temporary storage of those messages which will include your telephone number and the content of any SMS message.

- **I.T. system support and communications**

Our IT, telephony, web and email infrastructure, is provided by our sister company. They provide IT data hosting and backup along with helpdesk support which involves the processing and storing of your data. A number of the services are provided by other companies (sub processors), including:

- **Email security and archiving (sub processor)**

We use a third party to provide an email archive facility and secure email gateway to manage the threat of cyberattacks. Email addresses and the contents of emails are stored securely on a restricted access basis.

- **Phone call recording (sub Processor)**

We use a third party call recording software to record telephone calls made to or by us, which are processed and stored on our own servers. We may permit authorised access for the service provider, strictly to resolve technical problems with regard to the call recording software.

All our third party processors and their sub-processor’s comply with the relevant data protections legislation and have the technical measures in place to keep your data safe. Unless otherwise stated, our third party service providers do not process or transfer your data outside of the UK and only process your data as directed by us and in line with the terms of this notice.

## How long do we keep your information for?

Your personal data will be retained by us in the order to process your enquiry and arrange finance for you, in line with the table below:

Stage of application / Processing activity	What Personal data is retained	How long do we hold it?	Why do we retain it?
You have made an enquiry but we have not conducted a credit search or arranged finance for you.	Personal, contact information and basic loan application data.	6 months from the end of the enquiry.	In order to contact you and attempt to help to arrange finance for you.
You have made an enquiry and we have completed a credit search but not arranged finance for you.	Personal, contact information, full loan application data including credit search data.	12 months from the end of the enquiry.	In order to contact you and attempt to help to arrange finance for you. To help resolve complaints that may arise.
We have provided mortgage advice.	Personal and contact information, full loan application data including credit search data. Loan information and records of mortgage advice provided.	3 years from the end of the enquiry.	To meet our regulatory and legal obligations to keep accurate records.

# Legal & Privacy Notice



We have successfully arranged finance for you.	Personal and contact information, full loan application data including credit search data. Loan information and records of mortgage advice provided	3 years from the end of the contractual loan term or a minimum of 15 years from date of completion	To investigate and resolve complaints/defend legal claims, and to notify you of the end of your fixed rate product period that we arranged for you.
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In addition, where certain activities have taken place some of your personal data may be retained by us independently of the data above for the following purposes and durations:

Activity	What Personal data is retained	How long do we hold it?	Why do we retain it?
Completing customer due diligence checks or reporting suspicious activity	Evidence of proof of identity, income and address (where we have arranged finance). Records of suspicious activity Investigations and external reports to fraud prevention agencies	5 years from end of enquiry or from date of suspicious activity report	To comply with our legal obligations to prevent financial crime.
Investigating and responding to complaints.	Records of complaint investigation notes, supporting evidence including loan application data, copies of documents and records of communications.	3 years after end of contractual loan term	To comply with our regulatory obligations and to be able to identify and respond to duplicated claims or complaints made against us.
Sending promotional information and updates regarding our service and products.	Personal contact details.	While we have your consent and you are happy to continue to receive updates.	To keep you informed of our services and changes to products that may be of interest to you
Email communications	Email address and content of any emails sent to or received by us	Copies of emails are retained as part of the application history in line with the table above. In addition, an independent record of emails is kept in a restricted access secure archive for 10 years.	To comply with our legal obligations and for our own legitimate interests - to investigate and resolve complaints or defend legal claims
Telephone conversations	Telephone number and content of any telephone conversations made or received by us	Call recording are retained in a restricted access secure archive for up to 15 years from the end of the application	For our own legitimate interests - to investigate and resolve complaints or defend legal claims

## Third parties

If you are a person acting on behalf of an applicant or previous customer of ours we will process certain information about you.

## What information do we collect/hold about you?

- Your name and date of birth;
- Your contact information including your; address, telephone number and email address;
- Your relationship to the person on behalf of whom you are acting ;
- Your status as a third party i.e. whether you have the applicants authority to discuss their details, and/or act on their behalf in making the application or making a complaint; or
- Evidence of any formal authority to act on behalf of the applicants eg: power of attorney, grant of probate or similar;
- Correspondence between you and us, including the recording of telephone calls, e-mails, text messages, and any written correspondence.

## Where do we get your information from?

We may obtain your information from one or more of the following sources:

- You;
- The applicants;

## How we will use the information we collect about you?

- To arrange the application for finance on behalf of the applicants;
- Anti-fraud measures;
- To respond to requests from bodies such as police, national crime agency, department for work and pensions etc;
- To record and respond to complaints.

## Legal basis for processing personal data

When we process your personal data, we do so on the following legal bases:

### Legal obligation - In order to comply with the laws and regulations that apply to TLE, for example:

- to inform fraud prevention and/or law enforcement agencies where fraud or money laundering is identified or suspected; or
- to obtain or retain appropriate records, for example evidence of:
  - suspected fraud or money laundering;
  - mortgage advice;
  - proof of your identity (electronic or physical);
  - complaint investigations and outcomes.

### Legitimate interest (In the course of running our business) - including:

- to provide our service to the applicants;
- to improve our products and services;
- to record and respond to complaints made on behalf of the applicants;

If you are uncomfortable with us processing your data, you should not agree to act in any third party capacity, for the applicants.

## Who will we share your information with?

We may pass some of your information to the following third parties:

- The applicants for whom you are acting on behalf of;
- Fraud prevention agencies or other relevant authorities such as the police, national crime agency, HMRC and the department for work and pensions.

We will keep your information for as long as is required for the purpose for which you are acting as a third party and in accordance with our data retention policy described above, see - **'How long do we keep your information for?'**

## Your data protection rights

Your personal data is protected by legal rights, which include:

- **The right to be informed** - You are entitled to know how we will use your personal data. This privacy notice is designed to meet your right to be informed.
- **The right to access** - You are entitled to obtain a copy of your personal data and other supplementary information.
- **The right to rectification** - You are entitled to have inaccurate personal data corrected, or completed where it is incomplete.
- **The right to erasure** – In some circumstances, you are entitled to have your personal data deleted. This is not an absolute right, please contact our Data Protection Officer for further information.
- **The right to restriction** – In some circumstances, you are entitled to limit (suppress) the use of your personal data. This is not an absolute right, please contact our Data Protection Officer for further information.
- **The right to portability** - You are entitled to obtain your personal data in a structured, commonly used, 'machine readable' format which allows you to transfer that data easily and securely electronically. This only applies to personal data collected from you using automated means (for example filling out our online enquiry form).
- **The right to object** – In some circumstances, you are entitled to object to the processing of your personal data. This is not an absolute right, please contact our Data Protection Officer for further information. However, you do have the absolute right, at any time, to stop us processing your personal data for direct marketing purposes.

If you wish to exercise any of the above rights please contact our Data Protection Officer as set out in the Contact Us section below. You should expect to receive a response within 30 days.

We may require further information to enable us to handle your request, for instance to verify your identity or to evidence inaccuracy of data held. In these circumstances, you should expect to receive a response within 30 days of us receiving the additional information.

You also have a right to complain to the Information Commissioner's Office (<https://ico.org.uk/>) which regulates the processing of personal data.

## How do we keep your data secure?

We take the protection of personal information very seriously and we will maintain appropriate measures to maintain the confidentiality, integrity and availability of the information you have provided. Such measures include:

- Company security and Data protection policies and standards
- Staff training and awareness
- Role based access controls to prevent unauthorised access to the information
- Password protection of customer documents
- Anti-malware technologies
- Security monitoring and testing
- Secure archiving and deletion
- Compliance with industry regulation and legislation

## Contact Us

- Telephone: 01923 280000
- Central Loans Limited t/a The Loans Engine, 1<sup>st</sup> Floor, Building 2, Axis, Rhodes Way, Watford WD24 4YW



## Legal & Privacy Notice



For more information, or to exercise your data protection rights, please contact our data protection officer using the details above or by email at [DPO@theloansengine.co.uk](mailto:DPO@theloansengine.co.uk)

If you are unhappy about how your personal data has been used, further information about our complaints procedure can be found on our website at <https://www.theloansengine.co.uk/contact-us/>