

Broker Data Protection and privacy



Who are we?

Promise Solutions ("Promise") is a financial services company dealing with enquiries from brokers and the general public. We also trade under the names of Promise Money and Promise Specialist Lending.

Our contact details are;

Promise Solutions Ltd
Fullard House,
Neachells Lane,
Wolverhampton,
WV11 3QG

Tel: 01902 585020
Email: info@promisesolutions.co.uk

Our Data Protection Officer is Mr Stephen Walker.

Why do we need your data?

We will hold and process your data in order to provide the services anticipated in our introducer / intermediary agreement including informing you about products or services and obtaining a loan, mortgage and associated products from our panel of providers for you and your clients and recording your involvement in the process for the purpose of compliance and paying you commissions.

What right do we have to process your data?

Promise is regulated by the Financial Conduct Authority (FCA-www.fca.org.uk), which means we are accountable for the products and services we provide. We are obligated to maintain detailed records of transactions with customers which include personal details of who introduced the customer to us. We also maintain records of approved introducers / brokers to provide them with information about products / services and update them on the progress of individual applications. We process your data on the basis of **"processing is necessary to fulfil our contractual obligations to you"** as set out in our introducer / intermediary agreement.

What do we do with your data?

All of the personal data we hold about you will be processed by our staff based in the United Kingdom. 'Personal Data' is data that identifies you as an individual.

Your information may be stored on files and systems within our office and a cloud-based system whose servers are located within the EEA. We take all reasonable steps to maintain the security of your data.

Promise acts in a master broking / packaging capacity and will use you data to manage the products, services and overall relationship. In order to help you achieve the finance your clients require, we may need to share your data with one or a number of our lenders and other third parties at the appropriate time. We take the security and privacy of your data seriously and take great care over how we process your data to ensure it is done securely and safely at all times.

Some of the main uses of your data are included below:

<i>Party which could share in your personal data</i>	<i>Reason for its involvement</i>
One or more lenders from our panel	To record your details in their systems and on documents they produce for your clients
Your client	If you ask us inform your customer to contact you using information they didn't previously have
Your company / network / club	To identify cases you have been involved in for commission and compliance tracking
A specialist broker	On rare occasions when Promise is unable to help it might look to use the services of a specialist broker. For example, one specialising in non-standard applications.
Legal representatives	For example, an accountant or solicitor acting on your clients behalf.
Regulators and Ombudsmen	In the event of a complaint
Telephone provider	Our telephone calls are recorded for training purposes. They are saved using "cloud technology".
Computer cookies	Cookies are small text files placed on your machine when browsing a web site in order to improve your browsing experience. They feed anonymous tracking data (such as preferences) to third parties like Google and remember certain details you enter for example saving passwords. You can turn off cookies on your computer at any time.
Third Party System Providers	We use technology provided by third parties to send emails, text messages, use the internet, make phone calls, offer online chat facilities, help source financial products or more effectively handle your enquiry.
Third Party Consultants / Regulators	We occasionally use the services of third parties to audit our business who in the course of this may see your data. Various regulatory bodies also have the right to audit our business in the same way.

What type of data do we ask for?

We ask for "personal data". In essence "personal data" means any information which can lead to a person being identified. Obvious examples being name, address, date of birth etc. In addition, if you told us you were off work for an extended period due to ill health we may note this on our system which could be considered sensitive information.

Likely effects of you giving us your data.

We do not envisage any adverse effects resulting from you giving us your personal data. It would only be used for the purposes specified in this privacy notice and the introducer / intermediary agreement between us. Should you wish to reduce the scope of the services we offer or promote under this agreement you can do so via your preferences page when logged in to the loan portal.

How we store and retain your data?

We have taken the decision to retain all broker records on an indefinite basis to be able to retrieve any of our records at any time, to respond to customer or regulator enquiries and to deal with a new enquiry effectively at any time.

We store your data electronically as explained above.

Credit Reference Agency Data

We do not carry out credit searches as part of our registration process. We will seek your permission first to complete these if they become necessary.

What are your rights?

Importantly you have significant rights as to how any business uses and handles your data. Below is a brief summary:

- The right to be informed – and this notice you are reading is doing just that!
- The right of access – you can always ask to see what data we hold about you
- The right to rectification – this is saying if you believe any data stored about you is incorrect, you can ask us to correct it, and we will
- The right to request erasure or the 'the right to request to be forgotten' – we may have a legal requirement to keep records – for example if a loan has completed (See 'How we store and retain your data' above)
- The right to restrict processing – you can ask us to 'stop' processing your data at any time, however you should be aware if you do, then we may be unable to proceed with an ongoing application
- The right to data portability – Where we store your data in a database, we can arrange for your data to be formatted into a simple electronic file and sent to you
- The right to object – similar to the right to restrict processing (above), you can ask us to 'stop' processing your data at any time, however you should be aware if you do, then we may be unable to proceed with any pending application
- Rights relating to automated decision making and profiling and how we use it

Automated decision making

We do not use your data for automated decision making

Making a complaint

We always aim to offer the best possible service but there may be occasions when we fail to meet your expectations. Complaints should be addressed to our Data Protection Officer and sent to:

Promise Solutions
Neachells Lane,
Wolverhampton,
WV11 3QG
Tel: 01902 585008
2nd floor Fullard House
E mail: customercare@promisesolutions.co.uk

If you are dissatisfied by the outcome of your complaint you can escalate it to:

The Information Commissioners Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Tel: 0303 123 1113 (local rate)
01625 545 745 (National rate)
www.ico.org.uk

What may other organisations do?

If we pass your data on to another organisation, for example a lender preparing a quote for your client they may record your details for compliance purposes within their systems and will issue you a "fair processing notice" if required. Promise bears no responsibility for the use of your data beyond our control.

Promise Solutions is registered in England company number 04822774.
Authorised and regulated by the Financial Conduct Authority number 681423

Version GPDR notice April 2018