

The General Data Protection Regulation (GDPR) – Summary

1. It's the biggest change to UK data privacy law in 20 years

Thanks to technological advances the amount of personal data being generated is rapidly increasing – every time you shop online, use your favourite app or 'like' a photo on Facebook you generate data – which is why the law needs updating to better protect you. As part of the General Data Protection Regulation (GDPR) all companies have to review how they manage all personal data – from customer email addresses to employee bank details – and ensure they are GDPR-ready by 25th May 2018.

2. It will give you more control over your personal data

GDPR is all about giving you more control on how your personal data is used. You'll have greater visibility and control over the personal data organisations hold about you – whether it's something as simple as your name, or as complex and sensitive as medical information. This means you can have greater confidence that information about you is accurate, up-to-date and properly managed.

3. You can choose who contacts you, and how

Over the coming months you'll probably notice a lot of organisations asking for your consent so they can contact you about offers, products or services they think you'll find useful or interesting. To comply with GDPR, these requests need to be really clear and straightforward. You get to choose who contacts you and how, for example by email, social media or phone. Paratus AMC Ltd will only contact you if it concerns your mortgage or proposed mortgage.

4. You can also change your mind at any time

If you give an organisation permission to contact you, it doesn't mean you can't change your mind in the future. Under the new rules, it should be easier to update your preferences on what you want to receive and how.

5. Your data will be better protected

GDPR also aims to make sure that all organisations holding personal data have the right processes in place to protect it. Organisations that put customer data at risk will face hefty penalties.

6. Your right to request information

GDPR gives you rights to request certain information from Paratus AMC Ltd and to ask us what we are using your data for.

For more details on any of these points please read on.

How your personal information is used by Paratus AMC Ltd

Your information will be held by Paratus AMC Limited. More information on Paratus AMC Limited can be found at www.paratusamc.co.uk

How we use your personal information

This privacy notice is to let you know how we promise to look after your personal information. This includes what you tell us about yourself, what we learn by having you as a customer, and the choices you give us about what marketing you want us to send you. This notice explains how we do this and tells you about your privacy rights and how the law protects you.

Our Privacy Promise

We promise:

- To keep your data safe and private.
- Not to sell your data.
- To give you ways to manage and review your marketing choices at any time.

Data Protection Law

This notice sets out most of your rights under the laws.

Who we are

- Paratus AMC Limited.
- Our registered Office is 5 Arlington Square, Downshire Way, Bracknell, Berkshire RG12 1WA.
- Paratus AMC Limited is authorised and regulated by the Financial Conduct Authority. Our registration number is 301128.
- You can find out more about us at www.paratusamc.co.uk
- Or you can call us on 0344 770 8030
- Or write to:
The Data Protection Officer
Paratus AMC Limited
5 Arlington Square
Downshire Way
Bracknell
RG12 1WA

How the law protects you

As well as our Privacy Promise, your privacy is protected by law. This section explains how that works.

Data Protection law says that we are allowed to use personal information only if we have a proper reason to do so. This includes sharing it outside Paratus AMC Limited. The law says we must have one or more of these reasons:

- To fulfil a contract we have with you, or
- When it is our legal duty, or
- When it is in our legitimate interest, or
- When you consent to it.

A legitimate interest is when we have a business or commercial reason to use your information. But even then, it must not unfairly go against what is right and best for you. If we rely on our legitimate interest, we will tell you what that is.

Exemptions

The following list is of examples of the main areas of personal data where exemptions are allowed under GDPR ie this information does not have to be handled in the same way and is not available on the right to information:

- National Security;
- Crime and taxation;
- Health, education and social work;
- Miscellaneous health educational and social work;
- Regulatory activity;
- Journalism, Literature and Art;
- Research, history and statistics;
- Information available to the public, by or under, enactment;
- Disclosures required by law or made in connection with legal proceedings;
- Parliamentary privilege; and
- Domestic purposes.

Here is a list of all the ways that we may use your personal information, and which of the reasons we rely on to do so. This is also where we tell you what our legitimate interests are.

What we use your personal information for:	Our reasons	Our legitimate interests
<ul style="list-style-type: none"> • To manage our relationship with you or your business. • To develop new ways to meet our customers' needs and to grow our business. • To develop and carry out marketing activities. • To study how our customers use products and services from us and other organisations. • To provide guidance about our products and services. 	<ul style="list-style-type: none"> • Your consent. • Fulfilling contracts. • Our legitimate interests. • Our legal duty. 	<ul style="list-style-type: none"> • Keeping our records up to date, working out which of our products and services may interest you and telling you about them. • Developing products and services, and what we charge for them. • Defining types of customers for new products or services. • Seeking your consent when we need it to contact you. • Being efficient about how we fulfil our legal duties.
<ul style="list-style-type: none"> • To manage our relationship with you or your business by telephone. • To provide guidance about our products and services by telephone. • To deliver our products and services by telephone. • To make and manage customer payments. • To manage fees, charges and interest due on customer accounts by telephone. • To collect and recover money that is owed to us by telephone. • To manage and provide treasury and investment products and services by telephone. 	<ul style="list-style-type: none"> • Our legal duty. • Your consent. 	<ul style="list-style-type: none"> • Being efficient about how we fulfil our legal and contractual duties. • Complying with regulations that apply to us.
<ul style="list-style-type: none"> • To develop and manage our brands, products and services. • To test new products. 	<ul style="list-style-type: none"> • Fulfilling contracts. • Our legitimate interests. 	<ul style="list-style-type: none"> • Developing products and services, and what we charge for them. • Defining types of customers for new

What we use your personal information for:	Our reasons	Our legitimate interests
<ul style="list-style-type: none"> To manage how we work with other companies that provide services to us and our customers. 	<ul style="list-style-type: none"> Our legal duty. 	<ul style="list-style-type: none"> products or services. Being efficient about how we fulfil our legal and contractual duties.
<ul style="list-style-type: none"> To deliver our products and services. To make and manage customer payments. To manage fees, charges and interest due on customer accounts. To collect and recover money that is owed to us. To manage and provide treasury and investment products and services. 	<ul style="list-style-type: none"> Fulfilling contracts. Our legitimate interests. Our legal duty. 	<ul style="list-style-type: none"> Being efficient about how we fulfil our legal and contractual duties. Complying with regulations that apply to us.
<ul style="list-style-type: none"> To detect, investigate, report, and seek to prevent financial crime. To manage risk for us and our customers. To obey laws and regulations that applies to us. To respond to complaints and seek to resolve them. 	<ul style="list-style-type: none"> Fulfilling contracts. Our legitimate interests. Our legal duty. 	<ul style="list-style-type: none"> Developing and improving how we deal with financial crime, as well as doing our legal duties in this respect Complying with regulations that apply to us. Being efficient about how we fulfil our legal and contractual duties.
<ul style="list-style-type: none"> To run our business in an efficient and proper way. This includes managing our financial position, business capability, planning, communications, corporate governance, and audit. 	<ul style="list-style-type: none"> Our legitimate interests. Our legal duty. 	<ul style="list-style-type: none"> Complying with regulations that apply to us. Being efficient about how we fulfil our legal and contractual duties.
<ul style="list-style-type: none"> To exercise our rights set out in agreements or contracts. 	<ul style="list-style-type: none"> Fulfilling contracts. 	

Groups of Personal Information

We use many different kinds of personal information, and group them together like this.

Types of personal information	Description
Financial	Your financial position, status and history.
Contact	Where you live and how to contact you including your regular IP address or the one that you contact us on.
Socio-Demographic	This includes details about your work or profession, nationality, education and where you fit into general social or income groupings.
Transactional	Details about payments to and from your accounts with us, and insurance claims you make.
Contractual	Details about the products or services we provide to you.
Locational	Data we get about where you are, the address where you connect a computer to the internet, or when you pay our fees with your card.
Behavioural	Details about how you use our products and services.
Technical	Details on the devices and technology you use.
Communications	What we learn about you from letters, emails, and conversations between us.
Open Data and Public Records	Details about you that are in public records such as the Electoral Register, and information about you that is openly available on the internet.
Usage Data	Other data about how you use our products and services.
Documentary Data	Details about you that is stored in documents in different formats, or copies of them. This could include things like your passport, drivers licence, or birth certificate.
Special types of data	<p>The law and other regulations treat some types of personal information as special. We will only collect and use these types of data if the law allows us to do so:</p> <ul style="list-style-type: none"> Racial or ethnic origin; Religious or philosophical beliefs; Trade union membership;

Types of personal information	Description
	<ul style="list-style-type: none"> • Health data including gender; and • Criminal convictions and offences
Consents	Any permissions, consents, or preferences that you give us. This includes things like how you want us to contact you, or whether you prefer large-print formats.
National Identifier	A number or code given to you by a government to identify who you are, such as a National Insurance number.

Where we collect personal information from

We may collect personal information about you (or your business) from these sources:

Data you give to us:

- When you apply for our products and services;
- When you talk to us on the phone;
- When you use our websites;
- In emails and letters;
- In insurance claims or other documents;
- In customer surveys; or
- If you take part in our competitions or promotions.

Data we collect when you use our services.

This includes the amount, frequency, type, location, origin and recipients:

- Payment and transaction data.
- Profile and usage data. This includes the profile you create to identify yourself when you connect to our internet and telephone services. It also includes other data about how you use those services. We gather this data from devices you use to connect to those services, such as computers and mobile phones, using cookies and other internet tracking software.

Recording phone calls

We will monitor or record phone calls with you (whether you called us or we called you) in case we need to check we have carried out your instructions correctly, to resolve queries or issues, for regulatory purposes, to help improve our quality of service, and to help detect or prevent fraud or other crimes.

Conversations may also be monitored for staff training purposes.

We will also use interactive voice recognition technology to help us manage your account and provide you with the services you require.

In each case we will be fulfilling our legal duty (as outlined in the personal information table on page 3) in respect of your mortgage or proposed mortgage and as such we will not require your explicit consent to record these telephone calls.

Data from third parties we work with:

- Companies that introduce you to us.
- Financial advisers.
- Credit reference agencies.
- Insurers.
- Fraud prevention agencies.
- Payroll service providers.

- Land agents.
- Public information sources such as Companies House.
- Agents working on our behalf.
- Market researchers.
- Solicitors.
- Government and law enforcement agencies (UK and Overseas).

Who we share your personal information with

- Agents and advisers who we use to help run your accounts and services, collect what you owe, and explore new ways of doing business;
- HM Revenue & Customs, regulators and other authorities (UK and Overseas);
- UK Financial Services Compensation Scheme;
- Credit reference agencies;
- Fraud prevention agencies;
- Companies we have a joint venture or agreement to co-operate with;
- Organisations that introduce you to us;
- Independent Financial Advisors;
- Mortgage Brokers and Packagers; and
- Companies you ask us to share your data with.

We may need to share your personal information with other organisations to provide you with the product or service you have chosen:

- If you use direct debits, we will share your data with the Direct Debit scheme.
- If you apply for insurance through us, we may pass your personal or business details to the insurer, and onto any reinsurers.
- If you make an insurance claim, information you give to us or the insurer may be put on a register of claims. This will be shared with other insurers.
- If you have a secured loan or mortgage with us, we may share information with other lenders who also hold a charge on the property.

We may also share your personal information if the make-up of Paratus AMC Limited changes in the future:

- We may choose to sell, transfer, or merge parts of our business, or our assets. Or we may seek to acquire other businesses or merge with them.
- During any such process, we may share your data with other parties. We'll only do this if they agree to keep your data safe and private.
- If the change to our Group happens, then other parties may use your data in the same way as set out in this notice.

How we use your information to make automated decisions

We sometimes use systems to make automated decisions based on personal information we have – or are allowed to collect from others – about you or your business. This helps us to make sure our decisions are quick, fair, efficient and correct, based on what we know. These automated decisions can affect the products, services or features we may offer you now or in the future, or the price that we charge you for them. Here are the types of automated decision we make:

Pricing

We may decide what to charge for some products and services based on what we know.

Tailoring products and services

We may place you in groups with similar customers. These are called customer segments. We use these to study and learn about our customers' needs, and to make decisions based on what we learn. This helps us to design products and services for different customer segments, and to manage our relationships with them.

Detecting fraud

We use your personal information to help decide if your personal or business accounts may be being used for fraud or money-laundering. We may detect that an account is being used in ways that fraudsters work. Or we may notice that an account is being used in a way that is unusual for you or your business. If we think there is a risk of fraud, we may stop activity on the accounts or refuse access to them.

Approving credit

We use a rules based system to decide whether to lend money to you or your business, when you apply for a mortgage. We use historic data to assess how you're likely to act while paying back any money you borrow. This includes data about similar accounts you may have had before.

We use data from three sources:

- Your application form.
- Credit reference agencies.
- Data we may already hold.

We make an overall assessment based on this and to help make responsible lending decisions that are fair and informed.

Your rights

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

- Object to our processing of your personal data;
- Request that your personal data is erased or corrected;
- Request access to your personal data;
- You can ask that we do not make our decision based on the automated score alone; and
- You can object to an automated decision, and ask that a person reviews it.

For more information or to exercise your data protection rights please, please contact us using the contact details above.

Credit Reference Agencies (CRAs)

We carry out credit and identity checks when you apply for a product or services for you or your business. We may use Credit Reference Agencies to help us with this.

If you use our services, from time to time we may also search information that the CRAs have, to help us manage those accounts.

We will share your personal information with CRAs and they will give us information about you. The data we exchange can include:

- Name, address and date of birth
- Credit application
- Details of any shared credit
- Financial situation and history
- Public information, from sources such as the electoral register and Companies House.

We'll use this data to:

- Assess whether you or your business is able to afford to make repayments
- Make sure what you've told us is true and correct
- Help detect and prevent financial crime
- Manage accounts with us
- Trace and recover debts
- Make sure that we tell you about relevant offers.

We will go on sharing your personal information with CRAs for as long as you are a customer. This will include details about your settled accounts and any debts not fully repaid on time. It will also include details of funds going into the account, and the account balance as well as details of your repayments and whether you repay in full and on time. The CRAs may give this information to other organisations that want to check credit status. We will also tell the CRAs when you settle your accounts with us.

When we ask CRAs about you or your business, they will note it on your credit file. This is called a credit search. Other lenders may see this and we may see credit searches from other lenders.

If you apply for a product with someone else, we will link your records with theirs. We will do the same if you tell us you have a spouse, partner or civil partner – or that you are in business with other partners or directors.

You should tell them about this before you apply for a product or service. It is important that they know your records will be linked together, and that credit searches may be made on them.

CRAs will also link your records together. These links will stay on your files unless one of you asks the CRAs to break the link. You will normally need to give proof that you no longer have a financial link with each other.

You can find out more about the CRAs on their websites, in the Credit Reference Agency Information Notice. This includes details about:

- Who they are
- Their role as fraud prevention agencies
- The data they hold and how they use it

- How they share personal information
- How long they can keep data
- Your data protection rights.

Here are links to the information notice for each of the three main Credit Reference Agencies we use:

[Callcredit](#)

[Equifax](#)

[Experian](#)

Fraud Prevention Agencies (FPAs)

We may need to confirm your identity before we provide products or services to you or your business. Once you have become a customer of ours, we will also share your personal information as needed to help detect fraud and money-laundering risks. We use Fraud Prevention Agencies to help us with this.

When we and fraud prevention agencies process your personal data, we do so on the basis that we have a legitimate interest in preventing fraud and money laundering, and to verify identity, in order to protect our business and to comply with laws that apply to us. Such processing is also a contractual requirement of the services or financing you have requested. A legitimate interest is when we have a business or commercial reason to use your information. This must not unfairly go against what is right and best for you.

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

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 will use the information to:

- Confirm identities
- Help prevent fraud and money-laundering
- Fulfil any contracts you or your business has with us.

We or an FPA may allow law enforcement agencies to access your personal information. This is to support their duty to detect, investigate, prevent and prosecute crime.

The information we use

These are some of the kinds of personal information that we use:

- Name
- Date of birth
- Residential address
- History of where you have lived
- Contact details, such as email addresses and phone numbers
- Financial information
- Information relating to your or your businesses products or services
- Employment details

- Data that identifies computers or other devices you use to connect to the internet. This includes your Internet Protocol (IP) address.

Automated decisions for fraud prevention

The information we have for you or your business is made up of what you tell us and data we collect when you use our services, or from third parties we work with.

We and FPAs may process your personal information in systems that look for fraud by studying patterns in the data. We may find that an account is being used in ways that fraudsters work. Or we may notice that an account is being used in a way that is unusual for you or your business. Either of these could indicate a possible risk of fraud or money-laundering.

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 that of known fraudsters or money launderers; 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.

How this can affect you

If we or an FPA decide there is a risk of fraud, we may stop activity on the accounts or block access to them. FPAs will also keep a record of the risk that you or your business may pose.

This may result in other organisations refusing to provide you with products or services, or to employ you.

Data transfers out of the EEA

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.

Sending data outside of the EEA

We will only send your data outside of the European Economic Area ('EEA') to:

- Follow your instructions.
- Comply with a legal duty.
- Work with our agents and advisers who we use to help run your accounts and services.

If we do transfer information to our agents or advisers outside of the EEA, we will make sure that it is protected in the same way as if it was being used in the EEA. We'll use one of these safeguards:

- Transfer it to a non-EEA country with privacy laws that give the same protection as the EEA. Learn more [on the European Commission Justice website](#).
- Put in place a contract with the recipient that means they must protect it to the same standards as the EEA. Read more about this here [on the European Commission Justice website](#),
- For data sent to the USA, transfer it only to organisations that are part of Privacy Shield. This is a framework that sets privacy standards for data sent between the US and EU countries. It makes sure those standards are similar to what is used within the EEA. You can find out more [about data protection on the European Commission Justice website](#).

If you choose not to give personal information

We may need to collect personal information by law, or under the terms of a contract we have with you.

If you choose not to give us this personal information, it may delay or prevent us from meeting our obligations. It may also mean that we cannot perform services needed to run your accounts or policies. It could mean that we cancel a product or service you have with us.

Any data collection that is optional would be made clear at the point of collection.

Marketing

We may now and in the future use your personal information to tell you about relevant products and offers. This is what we mean when we talk about 'marketing'.

We can only use your personal information to send you marketing messages if we have either your consent or a 'legitimate interest'. That is when we have a business or commercial reason to use your information. It must not unfairly go against what is right and best for you.

You can ask us to stop sending you marketing messages by contacting us at any time.

The personal information we have for you is made up of what you tell us and data we collect when you use our services, or from third parties we work with.

We study this to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

Whatever you choose, you'll still receive statements, and other important information such as changes to your existing products and services.

We may ask you to confirm or update your choices, if you take out any new products or services with us in future. We will also ask you to do this if there are changes in the law, regulation, or the structure of our business.

If you change your mind you can update your choices at any time by contacting us.

How long we keep your personal information

We will keep your personal information for as long as you are a customer of Paratus AMC Limited.

After you stop being a customer, we may keep your data for up to 5 years for one of these reasons:

- To respond to any questions or complaints.
- To show that we treated you fairly.
- To maintain records according to rules that applies to us.

We may keep your data for longer than 5 years if we cannot delete it for legal, regulatory or technical reasons. We may also keep it for research or statistical purposes. If we do, we will make sure that your privacy is protected and only use it for those purposes.

How to get a copy of your personal information

You can access your personal information we hold by writing to us at this address:

The Data Protection Officer
Paratus AMC Limited
5 Arlington Square
Downshire Way
Bracknell
RG12 1WA

Letting us know if your personal information is incorrect

You have the right to question any information we have about you that you think is wrong or incomplete. Please contact us if you want to do this.

If you do, we will take reasonable steps to check its accuracy and correct it.

What if you want us to stop using your personal information?

You have the right to object to our use of your personal information, or to ask us to delete, remove, or stop using your personal information if there is no need for us to keep it. This is known as the 'right to object' and 'right to erasure', or the 'right to be forgotten'.

There may be legal or other official reasons why we need to keep or use your data. But please tell us if you think that we should not be using it.

We may sometimes be able to restrict the use of your data. This means that it can only be used for certain things, such as legal claims or to exercise legal rights. In this situation, we would not use or share your information in other ways while it is restricted.

You can ask us to restrict the use of your personal information if:

- It is not accurate.
- It has been used unlawfully but you don't want us to delete it.
- It not relevant any more, but you want us to keep it for use in legal claims.
- You have already asked us to stop using your data but you are waiting for us to tell you if we are allowed to keep on using it.

If you want to object to how we use your data, or ask us to delete it or restrict how we use it or, please contact us.

How to withdraw your consent

You can withdraw your consent at any time. Please contact us if you want to do so.

If you withdraw your consent, we may not be able to provide certain products or services to you. If this is so, we will tell you.

How to complain

Please let us know if you are unhappy with how we have used your personal information. You can contact us by

➤ By Telephone

You can call us on 0344 770 8030 or

➤ **By Email**

Email us at ConsumerAffairs@foundationhomeloans.co.uk.

➤ **In Writing**

You can write to us at:

Customer Relations Manager
Paratus AMC Limited
5 Arlington Square
Downshire Way
Bracknell
Berkshire RG12 1WA

You also have the right to complain to the Information Commissioner's Office. Find out on their website how to [report a concern](#).

Formats for sharing data

You have the right to get your personal information from us in a format that can be easily re-used. You can also ask us to pass on your personal information in this format to other organisations.

Cookies

To find out more about how we use cookies please see our cookie notice.