

Rest Less Mortgages Privacy Policy

Version 1.1 - 30 December 2021

At Rest Less we care about doing what's right for our customers. We recognise that by using our website and any of our services, you place a great deal of trust in us by giving us access to elements of your personal data. We take this responsibility seriously and work hard to make sure that we meet the high expectations you have of us in this regard.

This Privacy Policy is intended to be as transparent as possible about the personal information that we collect when you use our services and/or website, as well as how we process it. We've tried our hardest to minimise legal jargon, but if we haven't got it right then please let us know so we can improve.

Who are we?

We are Rest Less Mortgages Ltd, a company registered in England and Wales with registration number 13538805 and registered address at 47 Butt Road, Colchester, Essex, CO3 3BZ.

Rest Less Mortgages Ltd is part of the 'Rest Less Group' which is made up of the following companies, all of which are registered individually as data controllers with the Information Commissioner's Office (ICO):

- *Intrepid Owls Ltd (Trading as Rest Less) with company number 11402887 and ICO registration number ZA461958*
- *Rest Less Financial Services Ltd with company number 13477659 and ICO registration number ZB165325*
- *Rest Less Money Ltd with company number 13538787 ICO registration number ZB165326*

- Rest Less Mortgages Ltd with company number 13538805 and ICO registration number ZB165333*

All companies within the Rest Less Group have their Registered Office Address at 47 Butt Road, Colchester, Essex, CO3 3BZ. You can check our registrations on the Data Protection Public Register by visiting the [ICO Website](#).

If you have any questions about what's in this privacy policy you can email us at data@restless.co.uk or write to us at our registered address.

What personal data do we collect?

We collect information that you submit to the companies within the Rest Less Group. This could be through the website at restless.co.uk, via email, over the telephone or in a video call, or face to face in a conversation with one of our employees. The information collected will include:

- Information about your current or previous mortgage. Since a core part of our business is providing advice on a mortgage, we will collect detailed, relevant personal information about a range of items related to mortgages and property. This can include (but is not limited to) information on any existing or previous mortgages, as well as information about your property tenancy history.
- Financial information. As the mortgage lenders that we work with will want to assess the credit and fraud risk of applicants, we will also ask for detailed personal financial information. This could include things like employment, income and expenditure, and other financial circumstances.

- *If you apply for a mortgage through us we may also collect bank account, direct debit, and payment details to pass on to your lender, or to process any applicable fees or charges that you have consented to.*
- *Health information. As part of our service we also offer our customers advice on life and critical illness insurance, as well as buildings and contents insurance. If you have expressed an interest in these types of insurance policies, we will also collect 'sensitive' personal information about your health, including both current and past medical history, so that we can pass this on to the insurers we work with. This allows them to underwrite you and provide accurate quote and policy information. Where we have personally identifiable, 'sensitive', health information, we will only pass this information onto an insurance provider with your explicit consent. We treat this 'sensitive' information very carefully and only use it in strict accordance with the law.*
- *Credit Reference Agency Data. In order to provide suitable and appropriate advice to you, and as part of a mortgage application, we may access information from your credit file with a credit reference agency. We will seek your permission before doing so, as and when these checks become necessary. We strongly recommend that you read the Privacy Policies and Information Notices from these organisations about how they use your data so that you are fully informed about their use of personal data before proceeding further. You can find out more information about how the credit reference agencies use and process your information below:*
 - *Experian - www.experian.co.uk/crain*
 - *Equifax - www.equifax.co.uk/crain*
 - *Call Credit - www.callcredit.co.uk/crain*
- *Telephone and video calls. We may record incoming and outgoing telephone or video calls so that we can a) improve our customer service through better training and monitoring, b) ensure that we have*

captured the information you have given us correctly and c) help us to prevent fraud and resolve any disputes.

- *If you use any of the services provided by our partners - such as insurance - we will collect the personal data necessary for the partner to provide you with the service.*
- *Identity documents. To comply with the law and meet our requirements from an anti-money laundering and know-your-customer regulatory perspective, we will attempt to verify your name and address by checking your details against databases held by credit reference agencies, identity checking services, and the electoral roll. If we can't verify your name and address in this way, we may ask you to provide us with other personal identity documents.*
- *Information from social networks or online accounts. We sometimes use personal information that is available on social media platforms such as Facebook and Twitter, to understand what people are saying about us and to help prevent fraud.*
- *If you are a joint mortgage applicant we will record any information you give us about any other persons who are joined to the application.*
- *Information provided to and collected from other companies in the Rest Less Group.*
- *We use technology such as Google Analytics to track how visitors use our website, as well as identifying the route in which a customer found us, such as from specific web pages or adverts.*
- *We also use email tracking technology to capture information such as (but not limited to) the time and date that our emails are opened, the type of device used, and which links were clicked within the email.*

How do we use this information?

We use your personal data in order to provide advice and to arrange and implement services such as mortgages, life insurance, and other financial products. If you are unable to provide the information we need, we will be unable to assist you in obtaining the right mortgage or insurance option.

Rest Less Mortgages Ltd act in a broking and advisory capacity, and we are not a lender. In order to help you achieve the finance or insurance you require, we will need to share your data with a lender or insurance company at the appropriate time.

We may also use the information you provide to us in order to conduct searches with credit reference bureaus, electoral roll registers, and other public data providers. This will help us secure a suitable mortgage offer or insurance quote, and assist with identity checks to prevent money laundering.

As part of our regulatory requirements, if necessary we will also submit your details to fraud prevention agencies and other relevant organisations to help us prevent fraud and money laundering.

We may use your information to contact you in the future to discuss your mortgage or other related products where we believe there is a Legitimate Interest in doing so. This could include (but is not limited to) contacting you ahead of any mortgage or insurance product arranged through us coming to an end to ensure that you continue to be protected and can access the best rates available on a new deal. If you do not want us to do this you can ask us at any time to mark your records 'do not contact'.

If you provide us with positive feedback that you are pleased with the service we have provided, we may contact you to ask if you would be willing to provide a public review, testimonial, or recommend our service to other people you know.

Legal Basis for Processing Information

As outlined above, we will use your personal information for a number of reasons and under a number of lawful bases. The lawful bases that apply to the processing we perform on your information are:

Legitimate Interests – This is when we use personal data for a reason which is believed to be in yours and/or our interests. Importantly, it is only used in a way that doesn't involve overriding your privacy rights.

Consent – This is where you have provided us with a clear indication of freely given, specific, and informed permission to process your information. You're free to withdraw this consent at any point.

Contract – For example, if you are providing personal data for use with arranging a financial services contract such as a mortgage or insurance product etc.

Compliance with a legal obligation - We are required by law to submit a Suspicious Activity Report to the National Crime Agency whenever we detect a risk of money laundering or fraudulent activity. The law also permits us to report suspected crime to the appropriate authorities. We are also required to disclose personal data where required to do so by law or by the order of a court. We have discretion to disclose personal data where necessary for the protection of the public against dishonesty. We may also disclose information where permitted by law in connection with the resolution and pursuit of legal rights and disputes.

Who do we share your data with?

Rest Less Mortgages Ltd will never sell your data or personal information to a third party, and we won't give your personal information to external companies for their own marketing purposes.

We may share your information with a number of parties in order to provide you with our Mortgage and Protection advice services. This will include mortgage lenders and insurance providers amongst other parties. As part of our advice process, we will confirm with you before submitting your details to a lender or insurance provider. As part of a financial product application we may also share your details with credit reference agencies and/or fraud protection agencies.

To enable us to provide you with regulated Mortgage and Protection advice, your personal data will be shared with our FCA regulated principle firm, Julian Harris Mortgages Ltd, as well as with select third-party data storage and service providers - and legal or regulatory authorities if obliged to do so.

With your permission, we may also provide your details to other specialist product or service providers if we agree that they might be of use to you. This could include (but is not limited to) other specialist mortgage brokers, will writers, or providers of other related products and services.

Your data will be shared with the other legal entities within the Rest Less Group, as defined above, where we believe there is a Legitimate Interest in doing so. This could include (but is not limited to) using personal data to pre-fill forms when you apply for a new product, or to improve your experience of using products and services provided by the Rest Less Group.

To make sure our products and services run smoothly, we may also need to share your information with a number of selected third parties including:

- Our employees, other employees within the Rest Less Group, and anyone who works for us when they need it to do their job.*
- Business partners, suppliers, and subcontractors who are necessary in order to offer the services provided.*
- Advertisers and advertising networks that require the data (in an aggregated format whereby individuals cannot be individually identified), to select and serve relevant adverts to you and others and to make sure their adverts reach their intended audience.*

- *Analytics and search engine providers that assist us in the improvement and optimisation of our website such as Google Analytics.*
- *Software providers we have contractual agreements with to provide us with communications, database infrastructure, and customer support tools that require storage of your data.*
- *Anyone who you give us explicit permission to share it with.*
- *Anyone who we are under a duty to disclose or share your personal data with in order to comply with any legal obligation; or to protect the rights, property, or safety of Rest Less Mortgages Ltd, our customers, or others.*

When providing data to any third party - such as a mortgage lender or product provider - it is important to note that they are third party data controllers in their own right. This means that they will process your data in accordance with their own privacy policy and data processing rules. As a result, you are strongly advised to read the privacy policies of those businesses, as well as any information regarding how they treat your personal data before proceeding further. Rest Less Mortgages Ltd can accept no responsibility for how these other parties use your data.

How long we retain your data

The length of time that we keep your information will depend on the purpose for which we use it. We will only retain your information for as long as is necessary for those purposes.

Rest Less Mortgages Ltd is a regulated firm and we need to retain full and detailed records of all customer transactions in order to meet regulatory requirements. It is also important that we are able to access this information to support customer enquiries, legal claims, regulatory enquiries, and other compliance reasons.

Your rights

You have a number of rights with regards to your personal data. Under current legislation you have a right to:

- Be informed about our processing of your personal data
- Request access to your personal data and information about how we process it
- To have your personal data corrected if it is inaccurate and to have incomplete personal data completed (the “right to rectification”)
- To have your personal data deleted (the “right to be forgotten”)
- To restrict processing of your personal data
- To move, copy, or transfer your personal data (“data portability”)
- To object to the processing of your personal data
- Use rights in relation to automated decision making including profiling

You can find out more information about your rights at the Information Commissioner’s website: www.ico.org.uk.

If you would like to exercise any of these rights in relation to your personal data, please email data@restless.co.uk.

Keeping your information up to date

We work hard to ensure that your personal information is accurate. In order to assist us with this, please notify us of any changes to your circumstances or to the personal information that you have provided us with by emailing mortgages@restless.co.uk. You can also use the same email address to let us

know if you feel that we are holding inaccurate information about you and would like to have this reviewed.

How to make a complaint about our use of your data

If you have a complaint, please contact us by emailing data@restless.co.uk and we'll do our best to fix the problem and ensure it doesn't happen again.

If you're not happy, you have the right to lodge a complaint with the Information Commissioner's Office (ICO). You can do this via ico.org.uk/make-a-complaint/ or by writing to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

Cyber Security

We are required to employ adequate technical and organisational security measures to protect your personal information from any loss, destruction, damage, or unlawful disclosure. However, please remember that no transmission over email or our website can ever be guaranteed as secure. Consequently, please note that we cannot guarantee the security of any personal information which you transfer via email or our website.

Please also be aware that there is a significant risk posed by cyber fraud. There are incidences of fraudsters posing as legitimate businesses asking customers to email them bank details. If you receive an email from us or a potential lender or product provider requesting bank details, please contact your Adviser immediately for clarification.

Changes to this notice

From time to time, we may make changes to this notice due to a change in the nature of our business, or to reflect the latest recommendations and best practice in data protection.

If we make any changes, we will update the Privacy Notice on this page so that you can always see how we use and handle your personal information.

Contact Us

If you have any questions about our Privacy Notice or the personal information that we hold about you then please email data@restless.co.uk. We're always happy to hear from you.

Thank you for using Rest Less Mortgages

**Rest Less Mortgages Ltd is an appointed representative of Julian Harris Mortgages Ltd, Julian Harris House, Musgrove, Ashford. TN23 7UN which is authorised and regulated by the Financial Conduct Authority. Julian Harris Mortgages Ltd FCA Register number is 304155, Co No. 3927189. The Rest Less Mortgages Ltd registered office is: 47 Butt Road, Colchester, England, CO3 3BZ. Registered in England No. 13538805.*

Think carefully before securing debts against your home. Your home may be repossessed if you do not keep up repayments on your mortgage or any other debt secured on it. The Financial Ombudsman Service (FOS) is an agency for arbitrating on unresolved complaints between regulated firms and their clients. Full details of the FOS can be found on its website at www.financial-ombudsman.org.uk.