

Unit G2, The Whitechapel Centre  
85 Myrdle Street  
London  
E1 1HL

## **CUSTOMER PRIVACY NOTICE**

### **Why should you read this document?**

During the course of dealing with us, we will ask you to provide us with detailed personal information relating to your existing circumstances, your financial situation and, in some cases, your health and family health history (Your Personal Data). This document is important as it allows us to explain to you what we will need to do with Your Personal Data, and the various rights you have in relation to Your Personal Data. What do we mean by “Your Personal Data”?

The data controller of your personal information is Rainstone Financial Services Limited (trading name – Rainstone Money), a limited liability company registered at 85 Myrdle Street, Whitechapel, London, E1 1HL, with company number 09650440 (“we”, or “us”, or “our”). If you have any questions or concerns about our use of your personal information, then please contact us using the contact details provided at the bottom of this Notice in the 'How to contact us' section.

Your Personal Data means any information that describes or relates to your personal circumstances. Your Personal Data may identify you directly, for example your name, address, date of birth, national insurance number. Your Personal Data may also identify you indirectly, for example, your employment situation, your physical and mental health history, or any other information that could be associated with your cultural or social identity.

When we provide our services to you, we will collect personal information about you and others and we want to be open and transparent with you as to the types of information we collect about you, why we collect it, how we use it and who we may share it with.

### **What type of personal information will be processed and why?**

We may ask you to provide personal information by corresponding with us by phone, e-mail, letter or otherwise or during the course of our meetings with you.

In the context of providing you with assistance in relation to your Mortgage Lenders/Finance Lenders/Commercial Lenders and Insurance requirements your Personal Data may include:

- Title, name, date of birth, gender, nationality, civil/marital status, contact details, addresses and documents that are necessary to verify your identity
- Employment and remuneration information, (including salary/bonus schemes/overtime/sick pay/other benefits), employment history
- Bank account details, tax information, loans and credit commitments, personal credit history, sources of income and expenditure, family circumstances and details of dependents

- Health status and history, details of treatment and prognosis, medical reports (further details are provided below specifically with regard to the processing we may undertake in relation to this type of information)
- Any pre-existing Mortgage Lenders/Finance Lenders/Commercial Lenders and insurance products and the terms and conditions relating to these

### **The basis upon which our firm will deal with your Personal Data**

When we speak with you about your Mortgage Lenders/Finance Lenders/Commercial Lenders and insurance requirements, we do so on the basis that both parties are entering a contract for the supply of services. In order to perform that contract, and to arrange the products you require, we have the right to use Your Personal Data for the purposes detailed below.

We will only process the special category of personal data listed above with your explicit consent. We ask for your consent to the processing of this data at the end of this Notice. You may choose not to provide us with this consent. However, please note that if you do not provide us with your consent to collect and process the information listed in the table above:

- we may not be able to advise you fully in respect of certain products and services which require this information (in particular those relating to health or life insurance).;
- your application may be rejected by the providers of products and services which require this information; or
- the quotes for such products and services may be higher than would be the case if this information were provided.

In some circumstances, we may receive information about you from third parties. In particular, we will receive information about you from Credit Reference Agencies and Fraud Prevention Agencies. This may include details of the products and services you have applied for, those lenders, finance and credit organisations with whom you have (and have had) an agreement with, the amounts advanced, the amount and frequency of repayments and whether you have made your repayments on time and in full. This will help us make the best possible assessment of your financial situation before we decide whether we can provide you with our services and/or recommend any specific products and services. It is in our legitimate interests to process your personal information for this purpose. We may also ask you to provide Letters of Authority to allow us to receive information about you from provide.

Alternatively, either in the course of initial discussions with you or when the contract between us has come to an end for whatever reason, we have the right to use Your Personal Data provided it is in our legitimate business interest to do so and your rights are not affected. For example, we may need to respond to requests from Mortgage Lenders/Finance Lenders/Commercial lenders, insurance providers and our Compliance Service Provider relating to the advice we have given to you, or to make contact with you to seek feedback on the service you received.

On occasion, we will use Your Personal Data for contractual responsibilities we may owe our regulator, The Financial Conduct Authority, or for wider compliance with any legal or regulatory obligation to which we might be subject. In such circumstances, we would be processing Your Personal Data in order to meet a legal, compliance or other regulatory obligation to which we are subject.

### **The basis upon which we will process certain parts of Your Personal Data**

Where you ask us to assist you with for example your insurance, in particular life insurance and insurance that may assist you in the event of an accident or illness, we will ask you information about your ethnic origin, your health and medical history (Your Special Data). We will record and use Your Special Data in order to make enquiries of insurance providers in relation to insurance products that may meet your needs and to provide you with advice regarding the suitability of any product that may be available to you.

If you have parental responsibility for children under the age of 13, it is also very likely that we will record information on our systems that relates to those children and potentially, to their Special Data.

The arrangement of certain types of insurance may involve disclosure by you to us of information relating to historic or current criminal convictions or offences (together "Criminal Disclosures"). This is relevant to insurance related activities such as underwriting, claims and fraud management.

We will use special Data and any Criminal Disclosures in the same way as Your Personal Data generally, as set out in this Privacy Notice.

Information on Special Category Data and Criminal Disclosures must be capable of being exchanged freely between insurance intermediaries such as our Firm, and insurance providers, to enable customers to secure the important insurance protection that their needs require.

### **How do we collect Your Personal Data?**

We will collect and record Your Personal Data from a variety of sources, but mainly directly from you. You will usually provide information during the course of our initial meetings or conversations with you to establish your circumstances and needs and preferences in relation to Mortgage Lenders/Finance Lenders/Commercial Lenders and insurance. You will provide information to us verbally and in writing, including email.

We may also obtain some information from third parties, for example, credit checks, information from your employer, and searches of information in the public domain such as the voters roll. If we use technology solutions to assist in the collection of Your Personal Data for example software that is able to verify your credit status. We will only do this if we have consent from you for us or our nominated processor to access your information in this manner. With regards to electronic ID checks we would not require your consent but will inform you of how such software operates and the purpose for which it is used.

### **In the course of handling Your Personal Data, we will:**

- Record and store Your Personal Data in our paper files, mobile devices and on our computer systems (*websites, email, hard drives, and cloud facilities*). This information can only be accessed by employees and consultants within our firm and only when it is necessary to provide our service to you and to perform any administration tasks associated with or incidental to that service.
- Submit Your Personal Data to Product Providers/Mortgage Lenders/Finance Lenders/Commercial Lenders and/or Insurance Product providers, both in paper form and on-line via a secure portal. The provision of this information to a third party is essential in allowing us to progress any enquiry or application made on your behalf and to deal with any additional questions or administrative issues that lenders and providers may raise.
- Use Your Personal Data for the purposes of responding to any queries you may have in relation to any Mortgage Lenders/Finance Lenders/Commercial Lenders product or insurance policy you may take out, or to inform you of any developments in relation to those products and/or policies of which we might become aware.

### **Sharing Your Personal Data**

From time to time Your Personal Data will be shared with:

- **Mortgage lenders / Finance lenders / Insurance providers**
- Third parties who we believe will be able to assist us with your enquiry or application, or who are able to support your needs as identified. These third parties will include but may not be limited to, our **compliance advisers, product specialists, estate agents, providers of legal services such as estate planners, conveyancing, surveyors and valuers** (in each case where we believe this to be required due to your particular circumstances).
- **to providers of financial services, insurance and services in respect of whom you request** us to submit applications on your behalf and to receive updates from such providers for us to provide our services to you throughout the lifetime of our relationship with you;
- to our **partners** in order for them to help us provide our services to you, this includes:
  - our **IT systems providers** to assist us with providing you with an efficient, modern and professional service;
  - our suppliers of **audit and regulatory compliance support services** who may review our records containing your personal information in order to audit and report to us on our compliance with applicable laws and regulatory requirements;
  - our **solicitors, insurer(s) and insurance broker(s)** and any other provider of professional services to us.
- to **Credit Reference Agencies and Fraud Prevention Agencies** to help us make the best possible assessment of your financial situation before we decide whether we can provide you with services. We are also required to provide information to such agencies so that they can update the information which they hold about you and which they may share with other organisations;

- to **other financial institutions or regulatory bodies** with whom information is shared for money laundering checks, credit risk reduction and other fraud and crime prevention purposes;
- to a **prospective buyer** (and its agents and advisers) in the event we intend to sell any part of our business or its assets or if substantially all of our assets are acquired by a third party, in which case your personal information could form part of one of the assets we sell, provided that we inform the buyer it must use your personal information only for the purposes described in this Notice. We will never rent or sell your personal information other than as part of a sale of our business;
- to any **national and/or international regulatory, enforcement body, government agency or court** where we believe disclosure is necessary
  - (i) as a matter of applicable law or regulation (including where we are required by law to provide information to organisations such as HMRC),
  - (ii) to exercise, establish or defend our legal rights, or
  - (iii) to protect your vital interests of those of any other person; and
- to any **other person with your consent** to the disclosure or where we are permitted to do so by law.

In each case, Your Personal Data will only be shared for the purposes set out in this Customer Privacy Notice, i.e. to progress your mortgage/finance and/or insurance enquiry and to provide you with our professional services.

Please note that this sharing of Your Personal Data does not entitle such third parties to send you marketing or promotional messages: it is shared to ensure we can adequately fulfil our responsibilities to you, and as otherwise set out in this Customer Privacy Notice.

We do not envisage that the performance by us of our service will involve Your Personal Data being transferred outside of the European Economic Area.

### **Security and retention of Your Personal Data**

Your privacy is important to us and we will keep Your Personal Data secure in accordance with our legal responsibilities. We will take reasonable steps to safeguard Your Personal Data against it being accessed unlawfully or maliciously by a third party.

We also expect you to take reasonable steps to safeguard your own privacy when transferring information to us, such as not sending confidential information over unprotected email, ensuring email attachments are password protected or encrypted and only using secure methods of postage when original documentation is being sent to us.

Our legal basis for collecting and using your personal information will depend on the personal information concerned and the specific context in which we collect it. In respect of the personal information and the purposes for which we may process your personal information which are set out in this Notice, we have confirmed the legal basis upon which we collect and process your personal information in the 'What type of personal information will be processed and why?' section above.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you or with your explicit consent, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do

not provide your personal information).

Similarly, if we collect and use your personal information in reliance on our legitimate interests (or those of any third party), we will make clear to you at the relevant time what those legitimate interests are.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided under the “How to contact us”

### **Can I make a complaint?**

Yes, we are required to deal with any complaint you might make regarding the use of your data.

To make a complaint, please contact us by email, telephone or in writing at address at the front of this notice. You may also complain to the Information Commissioner's Office (ICO) at any time, as we have highlighted to you in the section above.

### **Data retention**

We retain personal information we collect from you where we have an ongoing legitimate need to do so, for example:

- to provide you with a product or service you have requested us to provide,
- to perform our contractual obligations to you;
- to comply with applicable legal, tax or accounting requirements;
- to defend or manage any claims or complaints between us, you and any relevant third party including taking legal advice in respect of such claims in order to establish, exercise or defend our legal rights or such claims. This would include complaints and claims which you may bring against us or which are submitted to a court, regulatory authority or ombudsman.

When we have no ongoing legitimate need to process your personal information, we will either delete or anonymise it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

### **Updates to this Notice**

We may change or update this Notice in order to maintain our compliance with applicable law and regulation or following an update to our internal practices. When we update our Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make.

Your Personal Data will be retained by us either electronically or in paper format for a minimum of six years, or in instances whereby we have legal right to such information we will retain records indefinitely.  
Your rights in relation to Your Personal Data

### **You can:**

- request copies of Your Personal Data that is under our control
- ask us to further explain how we use Your Personal Data
- ask us to correct, delete or require us to restrict or stop using Your Personal Data (details as to the extent to which we can do this will be provided at the time of any such request)
- ask us to send an electronic copy of Your Personal Data to another organisation should you wish
- change the basis of any consent you may have provided to enable us to market to you in the future (including withdrawing any consent in its entirety)

## **How to make contact with our Firm in relation to the use of Your Personal Data**

If you have any questions or comments about this document, or wish to make contact in order to exercise any of your rights set out within it please contact:

Mr Kobir Ahmed

Unit G2, The Whitechapel Centre

85 Myrdle Street

London

E1 1HL

Email - [info@rainstonemoney.co.uk](mailto:info@rainstonemoney.co.uk)

Tel – 0207 036 6435

If we feel we have a legal right not to deal with your request, or to action, it in different way to how you have requested, we will inform you of this at the time.

You should also make contact with us as soon as possible on you becoming aware of any unauthorised disclosure of Your Personal Data, so that we may investigate and fulfil our own regulatory obligations.

If you have any concerns or complaints as to how we have handled Your Personal Data you may lodge a complaint with the UK's data protection regulator, the ICO, who can be contacted through their website at <https://ico.org.uk/global/contact-us/> or by writing to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

### Data Subject Consent Form

I hereby grant **Rainstone Financial Services Limited** permission to process my personal data for the purpose stated in the Customer Privacy Notice above.

Signed:

Print Name:

Date:

#### **IMPORTANT NOTES: Marketing by our Firm**

If you do not indicate your agreement for **us** to make contact with you, we may be unable to provide you with details of products and/or services that may suit your needs and circumstances.

We would like to maintain a record of your express consent for **us** to contact you by post, telephone, SMS, email and instant messaging for marketing our products or services that we think may be of interest to you. Please indicate your consent to **us** contacting you by any of the means specified below:

Post

Phone

SMS

Email

Instant Messaging\*

\*Whatsapp or similar service.

### Marketing Consent

I, hereby grant **Rainstone Financial Services Limited** permission to process my personal data for the purpose of Marketing. By providing your consent, you agree that you have given your express permission for us to market you regarding products and services that we think may be of interest to you and by any means of communication that is suitable at the time.