



INTERNATIONAL PROPERTY FINANCE LIMITED

PRIVACY NOTICE

Our Privacy Policy - your rights, your information and how we use it

Our Privacy Policy contains important information about what personal details we collect; what we do with that information; who we may share it with and why; and your choices and rights when it comes to the personal information you have given us.

We may need to make changes to our Privacy Policy from time to time and if we make any material changes then we will make the updated Privacy Policy available to you on our website or by other means.

Who we are

We are International Property Finance Limited and your privacy is very important to us.

References to "we", "our" and "us" in this Privacy Policy are references to International Property Finance. We are a controller of your personal data under applicable data protection laws, including the General Data Protection Regulation ("GDPR"). We, as a controller, determine why and how we collect and use your personal data.

This version of our Privacy Policy was last updated on **09/10/2023**.

Information we collect and use

We collect and process personal data such as;

- your name, date of birth, residential and email address, contact telephone numbers, national insurance number, passport number/driving licence number, country of residence for tax purposes, nationality, bank account details, details of your assets and liabilities, details of your income and expenditure, details of your occupation
- information about your contact with us e.g. meetings, phone calls, emails/letters,
- information that is automatically collected e.g. via cookies or IP addresses when you visit our website
- information classified as 'sensitive' personal information e.g. relating to your health, marital or civil partnership status, or religious beliefs. This information will only be collected and used where it is needed to provide a recommendation, product or service you have requested or to comply with our legal obligations
- information you may provide us about other people e.g. joint applicants
- information on children e.g. where a child is named as occupant of the property. In these cases, we will collect and use only the information required to identify the child (such as their name, age, gender)
- as well as any other information asked for in product provider application forms and related documents

Where we collect your information

We may collect your personal information directly from you and from a variety of sources including:

- meetings with one of our mortgage advisers
- telephone conversations you have with us



- email or letters you send to us
- an application form for a product or service
- our website
- from your existing product providers
- from any other professional advisers e.g. your Accountant or Solicitor

What we collect and use your information for

We take your privacy seriously and we will only ever collect and use information which is personal to you where it is necessary, fair and lawful to do so. We will collect and use your information only where:

- you have given us your permission (consent) to send you information which we believe may be of interest and benefit to you. You have the right to withdraw your consent at any time.
- it is necessary to provide advice and arrange funding secured a property, e.g. if you wish us to source a mortgage for you, we will require some personal information including your name, address, date of birth, employment details, and income and expenditure
- it is necessary for us to meet our legal or regulatory obligations e.g. for the detection and prevention of fraud
- it is in the legitimate interests of International Property Finance Limited e.g. to deliver advice, information and guidance so you are aware of the options that will help you get the best outcome from our dealings with you; where we need to process your information to better understand you and your needs, to mitigate business and operational risks, to comply with internal policies, to investigate, detect and prevent fraud and other crime, to ensure information security, when purchasing services from third parties which support us in complying with our regulatory and legal obligations, to protect International Property Finance Limited's interests including legal rights and claims, where it is in the legitimate interests of a third party e.g. sharing information with your Accountant, Solicitor or a third party financial adviser. When evaluating whether legitimate interests can be relied on as a legal basis for the processing activities described above, a balancing test is carried out to ensure that the use of your personal data will not be overridden by your interests or fundamental rights and freedoms.

If you do not wish us to collect and use your personal information in these ways, it may mean that we will be unable to provide you with an appropriate recommendation, information and guidance or assist you in applying for a mortgage.

If we ask you to provide us with your personal information to comply with a legal requirement, or to allow us to enter into or perform a contract with you, then we may reject or delay dealing with you until the relevant information is received to our satisfaction e.g. for Anti-Money Laundering, Know Your Customer, the source of your wealth or tax purposes.

Who we might share your information with

We may share your information with third parties for the reasons outlined in "What we collect and use your information for". These third parties include:

- Your Accountant, Solicitor, employer or a financial adviser



- Companies we have chosen to support us in the delivery of our services we offer to you and other customers e.g. research, consultancy or technology companies; or companies who can help us in our contact with you e.g. an internet service provider
- Our regulators and Supervisory Authority e.g. the Financial Conduct Authority (FCA), and the Information Commissioners Office for the UK (ICO)
- Law Enforcement for the prevention and detection of crime

We will never sell your details to someone else. Whenever we share your personal information, we will do so in line with our obligations to keep your information safe and secure.

Where your information is processed

Your information is processed in the UK and the United Arab Emirates (UAE).

How we protect your information

To protect the security of your information, we implement appropriate technical and organisational security measures which include physical and technical security safeguards and we ensure that adequate policies, procedures and controls are in place with our organisation.

How long we keep your information

We will keep your personal information only where it is necessary to provide you with our services while you are a customer.

We may also keep your information after this period but only where required to meet our legal or regulatory obligations. The length of time we keep your information for these purposes will vary depending on the obligations we need to meet.

Your individual rights

You have several rights in relation to how International Property Finance Limited uses your information. They are:

Right to be informed

You have a right to receive clear and easy to understand information on what personal information we have, why and who we share it with - we do this via our Privacy Policy.

Right of access

You have the right of access to your personal information. If you wish to receive a copy of the personal information, we hold on you, you may make a data subject access request (DSAR). There is no charge for this, and we will supply the information to you within 30 days.

Right to request that your personal information be rectified

If your personal information is inaccurate or incomplete, you can request that it is corrected.



Right to request erasure

You can ask for your information to be deleted or removed if there is not a compelling reason for International Property Finance Limited to continue to have it.

Right to restrict processing

You can ask that we block or suppress the processing of your personal information for certain reasons. This means that we are still permitted to keep your information - but only to ensure we don't use it in the future for those reasons you have restricted.

Right to data portability

You can ask for a copy of your personal information for your own purposes to use across different services. In certain circumstances, you may move, copy or transfer the personal information we hold to another company in a safe and secure way.

Right to object

You can object to International Property Finance Limited processing your personal information where it is based on our legitimate interests (including profiling); for direct marketing (including profiling); and if we were using it for scientific/historical research and statistics.

How to contact us

To exercise your individual rights or if you have any questions about our Privacy Policy or the information we collect or use about you, please contact.

The Data Protection Officer, International Property Finance Limited, 5 Abell Way, Chelmsford, Essex, CM2 6WU

Telephone: 01935 722 924

How to make a complaint

We will always strive to collect, use and safeguard your personal information in line with data protection laws. If you do not believe we have handled your information as set out in our Privacy Policy, please write to us at International Property Finance Limited, 5 Abell Way, Chelmsford, Essex, CM2 6WU Telephone: 01935 722 924 and we will do our utmost to make things right.

If you are still unhappy, you can complain to our Supervisory Authority, the ICO. Their telephone number is: 0303 123 1113 (local rate number - calls to this number cost the same as calls to 01 or 02 numbers).