

# Fair Processing Notice



**Fluent Lifetime Ltd** (Fluent) is a lifetime mortgage broker. Our company number is 11226852. Our registered and trading office address is 102 Rivington House, Chorley New Road, Bolton BL6 5UE

Our Data Protection Officer is Mr Stuart Almond, [DPO@fluentmoney.co.uk](mailto:DPO@fluentmoney.co.uk)  
Tel: 01204 472015

## Why do we need your data?

We will hold and process your data in order to assist you with obtaining a lifetime mortgage product. If you do not provide the information we request, we will be unable to assist you in obtaining the right lifetime mortgage. We will only collect the data we need.

## What right do we have to process your data?

Fluent is regulated by the Financial Conduct Authority (FCA [www.fca.org.uk](http://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 and so we process your data on the basis of **“processing is necessary for compliance with a legal obligation”** and **“Legitimate Interest”** as set out by the Information Commissioner's Office (ICO [www.ico.org.uk](http://www.ico.org.uk)).

## 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 a cloud-based system whose servers are located within the EEA. We take all reasonable steps to maintain the security of your data, and we are ISO27001 compliant. Our data storage provider is Lantec and their privacy policy can be found at <https://www.lan.co.uk/support/>

We act in a broking capacity; 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 pride ourselves on our systems and we take great care over how we process customer data, and ensure it is done securely and safely at all times. We want you to be confident in Fluent and be assured that we take the security and privacy of your data seriously.

Fluent also believe you should be fully informed about other organisations we may share your data with and have the opportunity to look at how they may handle your information. We have therefore provided links to all the lenders and insurers that we use. If you wish to view their Fair Processing Notice, please follow the links as listed at the end of this document.

During the processing of your application, your data may be utilised in conjunction with our third-party suppliers for the purpose of identity verification or fulfilment of our marketing communication strategy. We will remain the data controller in all instances.

We may also, with your permission, contact you in the future to discuss your lifetime mortgage or related relevant products. Your preferences around this contact will be obtained during your initial contact with Fluent Money, and you have the right to amend these preferences at any time.

## How long do we keep your data?

Fluent Mortgages is the principal firm for Fluent Lifetime and is an FCA regulated firm, and we need to retain full and detailed records of all our customer transactions where they have taken place in order to meet regulatory requirements. We feel it is important to be able to retrieve any of our records for an appropriate time to respond to or support customer or regulator enquiries.

Fluent have taken the decision to retain customer records on the following basis;

Stage in regulated process	Term of retention	Action after term of retention
Where no regulated advice has been provided	Retain data for 12 months	Pseudonymise (make unidentifiable) *
Where regulated advice has been given but not taken forward	Retain data for 6 years from the date of advice	Pseudonymise (make unidentifiable) *
Where regulated advice has been given and the transaction completed	Retain for a total period of the completed product term plus 6 years	Pseudonymise (make unidentifiable) *

\*except where you have given us consent for marketing

### What are your rights?

Importantly you have significant rights as to how Fluent, or 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 have a legal requirement to maintain customer records (See ‘How long do we keep 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 will be unable to proceed with your application
- The right to data portability – should you want to, 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 will be unable to proceed with your application
- Rights in relation to automated decision making and profiling – you have a right to be made aware of this

You also have the right to make a complaint about how your data has been processed by Fluent. In the first instance, you can contact us directly by email [DPO@fluentmoney.co.uk](mailto:DPO@fluentmoney.co.uk), or phone 01204 472015.

### What may other organisations do?

If, with your permission, we pass your data on to another organisation in order to assist you; any data we have supplied plus any data requested or gathered by that business will be held by that business for the purposes they then set out in their own ‘fair processing notice or ‘privacy policy’. You are strongly advised to read that businesses’ guidelines on how they treat your data before entering into any agreement. Fluent bears no responsibility for the use of your data beyond our control.

### Lenders, Insurers and Partners

Aviva	<a href="https://www.aviva.co.uk/legal/privacy-policy.html">https://www.aviva.co.uk/legal/privacy-policy.html</a>
Hodge Bank	<a href="https://www.hodgebank.co.uk/privacy-policy/">https://www.hodgebank.co.uk/privacy-policy/</a>
Just Group	<a href="https://www.wearejust.co.uk/privacy-policy/">https://www.wearejust.co.uk/privacy-policy/</a>
Legal & General	<a href="https://www.legalandgeneral.com/privacy-policy/">https://www.legalandgeneral.com/privacy-policy/</a>
LV	<a href="https://www.lv.com/dataprotection">https://www.lv.com/dataprotection</a>
more 2 life	<a href="https://advisers.more2life.co.uk/privacy-policy/">https://advisers.more2life.co.uk/privacy-policy/</a>
OneFamily	<a href="https://www.onefamily.com/privacy-policy-and-uses-of-data/">https://www.onefamily.com/privacy-policy-and-uses-of-data/</a>
Pure Retirement	<a href="https://pureretirement.co.uk/privacy-policy/">https://pureretirement.co.uk/privacy-policy/</a>
Canada Life	<a href="https://www.canadalife.co.uk/data-protection-notice">https://www.canadalife.co.uk/data-protection-notice</a>
TransUnion	<a href="http://www.transunion.co.uk/crain">www.transunion.co.uk/crain</a>