

Fair Processing Notice



Fluent Money is a trading style of Fluent Mortgages Horwich Ltd (Fluent), a first charge mortgage & non-investment insurance broker.

Our company number is 14127588, and our Data Protection Register number is ZB338698. Our registered and trading office address is

102 Rivington House, Chorley New Road, Bolton BL6 5UE

Our Data Protection Officer is Mr John Lewis, DPO@fluentmoney.co.uk

Tel: 01204 472020

The personal data we collect about you

- Identity data including forenames, last name, maiden name, date of birth, gender, marital status, and username or similar identifier
- Contact data including home address, email address and telephone numbers
- Financial data including banks statements, payment card details, savings, debts such as loans and credit cards, income & expenditure, employer & pension benefits, and other assets
- Special category data (specifically medical history)
- Transaction data including payments made for products and services you have purchased from us
- Technical data including internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices used to access the Mortgage Advice Bureau website
- Profile and usage data including purchases made by you, feedback and survey responses, and how you use our website, products and services
- Marketing and communications data including your preferences in receiving marketing from us and our business partners and your communication preferences

How do we collect your data

Personal data is collected by us using the following methods:

- Direct interactions with an adviser by post, phone (including call recordings and voicemail), email, videoconferencing or otherwise when sourcing and applying for mortgage or protection products, processing identity, contact and financial categories of personal data.
- Automated technologies or technical interactions with our website, via the customer portal, by using a web enquiry form, processing identity, contact, financial and technical categories of personal data.
- Third parties or publicly available sources (processing identity, contact and financial categories of personal data) such as:
 - Estate agents with whom you may be interacting, but only with your consent;
 - New home builders, as a legitimate interest of the builder in order to assess affordability for the property;
 - Enquiries you may perform on third-party mortgage sourcing websites.

Why do we need your data?

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

What right do we have to process your data?

Fluent is an appointed representative of Mortgage Advice Bureau Ltd and Mortgage Advice Bureau (Derby) Ltd, who are regulated by the Financial Conduct Authority (FCA www.fca.org.uk). To ensure the accountability for the products and services we provide, we are obligated to maintain detailed records of transactions with customers and share these records with these firms. Mortgage Advice Bureau's company number is 3368205, and their Data Protection Register number is Z1063949 Mortgage Advice Bureau (Derby)'s company number is 06003803 and their Data Protection Register number is Z1063949. Both firm's registered address is Capital House, 2 Pride Place, Derby DE24 8QR. Details about Mortgage Advice Bureau and how they process data can be found at www.mortgageadvicebureau.com/privacy-policy.

Purpose/Activity	Type(s) of data	Lawful basis for processing
To initially engage with you to discuss your requirements	<ul style="list-style-type: none"> • Identity • Contact 	Consent
To source products, provide indicative quotes, and process & deliver your application for a mortgage or protection product	<ul style="list-style-type: none"> • Identity • Contact • Financial • Transaction • Marketing & Comms • Special Category 	Performance of a contract with you to provide advice services Special Category data - Explicit Consent (Medical information for protection policies)
To comply with FCA rules including record keeping, consumer duty, vulnerable customers, and to meet Anti Money Laundering legislation, and notifying you about changes to our terms or privacy policy	<ul style="list-style-type: none"> • Identity • Contact • Financial • Transaction • Special Category 	To comply with a legal obligation Special Category data – Substantial Public Interest (Statutory & Government Purposes) supported by Vulnerable Customer policy
To recover debts due to us	<ul style="list-style-type: none"> • Identity • Contact • Transaction 	Performance of a contract with you to provide advice services
To create and maintain access to the My Fluent portal and app	<ul style="list-style-type: none"> • Identity • Contact • Profile & Usage • Marketing & Comms 	Performance of a contract with you to provide advice services
To manage our client relationship with you which will include: Customer reviews / surveys On-going communications until you are ready to proceed Re-engagement when existing products nears expiry / review protection needs	<ul style="list-style-type: none"> • Identity • Contact • Profile & Usage • Marketing & Comms 	Performance of a contract with you to provide advice services
To respond to case enquiries and input to & defend against complaints	<ul style="list-style-type: none"> • Identity • Contact • Profile & Usage • Transaction • Marketing & Comms • Special Category 	Legal & Regulatory Obligation Special Category data - Legal Claims & Judicial Acts
Record calls to perform checks on the quality of advice our advisers provide to clients	<ul style="list-style-type: none"> • Identity • Contact • Special Category 	Legal & Regulatory Obligation Special Category data - Explicit Consent
To use cookies, data analytics and other systems to improve our website, products/services, marketing, customer relationships and experiences	<ul style="list-style-type: none"> • Identity • Technical • Profile & Usage 	Consent / Explicit Consent

Purpose/Activity	Type(s) of data	Lawful basis for processing
To use systems including AI and automated decision making to support our services and assist with document validation, affordability and product sourcing	<ul style="list-style-type: none"> • Identity • Contact • Financial • Special Category 	Necessary for our legitimate interests (to assist advisers with the advice process and inform our client re-engagement and marketing strategy)

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 accredited. 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 may also need to share your data with credit reference agencies, estate agents, home builders, conveyancers, surveyors or other third parties relevant to the processing of your mortgage application. 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 share your data within the Mortgage Advice Bureau network if required to facilitate your mortgage application.

We may also, contact you in the future to discuss your 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 or withdraw entirely from this service.

We may use data analytics and other systems including AI and automated decision-making to improve our website, products/services, marketing, customer relationships and experiences.

Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

How long do we keep your data?

As Fluent operates under FCA regulations, we need to retain full and detailed records of all of 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 2 years	Records are anonymised, and all personal data removed
Where regulated advice has been given but not taken forward	Retain data for 6 years from the date of advice	Records are anonymised, and all personal data removed
Where regulated advice has been given and the transaction completed	Retain for a total period of the completed product term plus 6 years	Records are anonymised, and all personal data removed

Credit Reference Agency Data

At Fluent, we help customers obtain finance by a number of means. In order to get a picture of your true credit position, we access and search your credit file with a credit reference agency.

We believe in informing customers at all stages about searches we carry out and we will seek your permission to complete these when they become necessary.

If you wish to know how the credit reference agencies will treat your data, please see their policies via these links:

TransUnion	www.transunion.co.uk/crain
Equifax	www.equifax.co.uk/crain
Experian	www.experian.co.uk/crain

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, or phone 01204 472015. If you are not satisfied with how we respond to your enquiry you do have the right to complain to the Information Commissioners Office (ICO) who is the regulator for data protection in the United Kingdom.

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 Third Parties

Accord Mortgages	https://www.accordmortgages.com/privacy/index.html
Aegon	https://www.aegon.co.uk/support/faq/privacy.html
Al Rayan Bank	https://www.alrayanbank.co.uk/privacy-policy
Aldermore Bank	https://www.aldermore.co.uk/legal/privacy-policy/
Aviva	https://www.aviva.co.uk/services/about-our-business/products-and-services/privacy-policy/
Bank of Ireland UK	https://www.bankofirelanduk.com/site-links/privacy-notice/
Barclays	https://www.barclays.co.uk/important-information/privacy-policy/
Bath Building Society	https://www.bathbuildingsociety.co.uk/privacy-and-cookies

Beverley Building Society	https://beverleybs.co.uk/privacy-notice
Birmingham Midshires	http://www.bmsolutions.co.uk/privacy/
Bluestone Mortgages	https://www.bluestone.co.uk/Universal-Pages/Our-Policies
Buckinghamshire Building Society	https://www.bucksbs.co.uk/privacy-policy.html
Cambridge Building Society	https://www.cambridgebs.co.uk/privacy-policy
Chorley & District Building Society	https://www.chorleybs.co.uk/privacy/
Clydesdale Bank	https://secure.cbonline.co.uk/site-information/legal-privacy/
Coutts	https://www.coutts.com/privacy-and-cookie-policy.html
Coventry Building Society	https://www.coventrybuildingsociety.co.uk/consumer/help/privacy-policy.html
Darlington Building Society	https://www.darlington.co.uk/privacy-policy/
Digital Mortgages by Atom Bank	https://www.digitalmortgages.net/residential/terms/privacy-and-your-data
Dudley Building Society	https://www.dudleybuildingsociety.co.uk/privacy-policy/
Earl Shilton Building Society	https://www.esbs.co.uk/privacy-notice/
Ecology Building Society	https://www.ecology.co.uk/homepage/privacy-notice/
Family Building Society	https://familybuildingsociety.co.uk/About-us-home/Society/Cookie-and-privacy-policy.aspx
Fleet Mortgages	https://www.fleetmortgages.co.uk/privacy/
Foundation Home Loans	https://www.foundationforintermediaries.co.uk/fair-processing-notice/
Furness Building Society	https://www.furnessbs.co.uk/privacy-page/
Generation Home	https://www.generationhome.com/docs/privacy-notice
Halifax	https://www.halifax.co.uk/securityandprivacy/privacy/
Hanley Economic Building Society	https://www.thehanley.co.uk/privacy-notice/
Harpenden Building Society	https://www.harpendenbs.co.uk/about-us/your-privacy/privacy-notice/
Hinckley and Rugby Building Society	https://www.hrbs.co.uk/privacy/
Hodge Lifetime	https://hodgebank.co.uk/privacy/
HSBC	https://www.hsbc.co.uk/privacy-notice/
Interbay	https://www.interbay.co.uk/privacy-policy
Ipipeline	https://www.ipipeline.com/privacy-notice/

Ipswich Building Society	https://www.ibs.co.uk/legal-statements
Kensington Mortgages	https://www.kmc.co.uk/about-us/legal-info
Kent Reliance	https://www.kentreliance.co.uk/data-protection-faqs
Keystone Property Finance	http://www.keystonepropertyfinance.co.uk/privacy-cookie-policies/
Landbay	https://landbay.co.uk/privacy-policy
Leeds Building Society	http://www.leedsbuildingsociety.co.uk/security/use-of-personal-information/
Leek United Building Society	https://www.leekunited.co.uk/full-privacy-notice/
Legal & General	https://www.legalandgeneral.com/privacy-policy/
Lendinvest	https://www.lendinvest.com/
Lifequote	https://www.lifequote.co.uk/home/adviser-privacy-notice/
Loughborough Building Society	https://www.theloughborough.co.uk/wp-
Market Harborough Building Society	https://mhbs.co.uk/privacy-policy/
Marsden Building Society	https://www.themarsden.co.uk/privacy/
Masthaven	https://www.masthaven.co.uk/site/privacy-notice/
MBS Lending	https://www.mbslending.co.uk/how-we-use-your-information/
Melton Mowbray Building Society	https://www.themelton.co.uk/
Metro Bank	https://www.metrobankonline.co.uk/about-us/privacy-and-security/
Monmouthshire Building Society	https://www.monbs.com/privacy/
Mpowered	https://www.mpowered.co.uk/mp-privacy-notice
Nationwide Building Society	https://www.nationwide.co.uk/about/corporate-information/cookies-and-privacy/introduction
NatWest	https://personal.natwest.com/global/privacy.html
Newbury Building Society	https://www.newbury.co.uk/privacy-notice/
Newcastle Building Society	https://www.newcastle.co.uk/faqs/website-online-services/privacy-data-protection-policy/
Norton Finance	https://www.nortonfinance.co.uk/Documents/PrivacyPolicyAndFairProcessingNoticeWebsiteGDPApril2018.pdf
Norwich and Peterborough Building Society	https://www.nandp.co.uk/privacy/index.html
Nottingham Building Society	https://www.thenottingham.com/privacy-policy/
OneFamily	https://www.onefamily.com/privacy-notice/
Paragon	https://www.paragonbank.co.uk/data-protection

Penrith Building Society	https://www.penrithbs.co.uk/privacy-policy/
Pepper Money	https://www.peppergroup.co.uk/privacy-policy
Platform	https://www.platform.co.uk/privacy-and-cookies/privacy-policy/index
Precise Mortgages	https://www.precisemortgages.co.uk/PP
Principality Building Society	http://www.principality.co.uk/en/privacy-and-security
Progressive Building Society	https://theprogressive.com/privacy-policy
Royal London	https://www.royallondon.com/legal/
Saffron Building Society	https://www.saffronbs.co.uk/privacy-policy
Santander	https://www.santander.co.uk/uk/help-support/security-centre/data-protection
Scottish Building Society	https://www.scottishbs.co.uk/data-privacy-policy
Scottish Widows	https://www.scottishwidows.co.uk/legal-information/legal-and-privacy/
Secure Trust Bank	https://www.securetrustbank.com/privacy-statement
Shawbrook Bank	https://www.shawbrook.co.uk/privacy-notice/
Skipton Building Society	https://www.skipton.co.uk/privacy-policy
Skipton International	https://www.skiptoninternational.com/privacy-policy
Stafford Railway Building Society	https://srbs.co.uk/srbs-your-privacy-matters-to-us
Swansea Building Society	https://www.swansea-bs.co.uk/privacy-information
Teachers Building Society	https://www.teachersbs.co.uk/more/privacy
The Cumberland	https://www.cumberland.co.uk/privacy
The Exeter	https://www.the-exeter.com/privacy-policy/
The Mansfield Building Society	https://www.mansfieldbs.co.uk/privacy-notice/
The Mortgage Lender	https://themortgagelender.com/fair-processing-notice/
The Mortgage Works	http://www.themortgageworks.co.uk/includes/pdf/T31_11_17.pdf
Tipton & Coseley Building Society	https://www.thetipton.co.uk/privacy/
Together	https://togethermoney.com/privacy-and-cookie-policy/
TSB	https://www.tsb.co.uk/privacy/
Underwrite.me	https://www.underwrite.me.co.uk/protection-platform-privacy-policy/
Uinsure	https://uinsure.co.uk/customer-privacy-notice/
United Trust Bank	https://www.utbank.co.uk/privacy-notice/
Vernon Building Society	https://www.thevernon.co.uk/SinglePage.aspx?cid=244
Vida Homeloans	http://www.vidahomeloans.co.uk/intermediaries/data-privacy

Virgin Money	https://uk.virginmoney.com/virgin/security.jsp
West Bromwich Building Society	https://www.westbrom.co.uk/privacy-and-security-centre
Zephyr	https://zephyrhomeloans.co.uk/privacy/
Zurich	https://www.zurich.co.uk/privacy