

Fair Processing Notice



Who are we?

Fluent Money Group Ltd (Fluent) is a financial services company, made up of:

- **Fluent Money Ltd**, company number 06200496
- **Fluent Lifetime Ltd T/A Fluent Money**, company number 11226852
- **Fluent Mortgages Ltd T/A Fluent Money**, company number 05962939
- **Fluent Bridging Ltd T/A Fluent Money**, company number 13198365
- **Fluent Loans Ltd T/A Fluent Money**, company number 06890680

Registered office address: 102 Rivington House, Chorley New Road, Bolton BL6 5UE

This Fair Processing Notice was last updated on the 2nd April 2025. Historic versions of this document are available on request.

Why do we need your data?

We will hold and process your data in order to assist you with obtaining a loan, insurance, first charge, second charge or lifetime mortgage. If you do not provide the information we request, we will be unable to assist you in obtaining the right finance option. 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), 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).

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 as part of the advice process	<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 including identity verification, 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
Purpose/Activity	Type(s) of data	Lawful basis for processing
To perform internal audits of our activity by third party auditors across the organisation	<ul style="list-style-type: none">• Identity• Contact• Financial	To comply with a legal obligation

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
<p>To manage our client relationship with you which will include:</p> <p>On-going communications until you are ready to proceed</p> <p>Re-engagement when existing products nears expiry / review protection needs</p>	<ul style="list-style-type: none"> • Identity • Contact • Profile & Usage • Marketing & Comms 	Necessary for our legitimate interests (to maintain an on-going relationship with you and review your mortgage and protection needs, and maintain & improve customer service standards)
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
To perform customer service and satisfaction surveys for recently completed transactions	<ul style="list-style-type: none"> • Identity • Contact 	Consent
To 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 generate reports on business activity for the purposes of performance and capacity planning	<ul style="list-style-type: none"> • Identity • Contact • Financial • Transaction • Special Category 	Necessary for our legitimate interests (to our business and marketing strategy)
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
To use automated decision making to support our services and assist with affordability and product sourcing	<ul style="list-style-type: none"> • Identity • Contact • Financial • Special Category 	Performance of a contract with you to provide advice services)

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.

Fluent businesses act in a broking capacity; we are not lenders. In order to help you achieve the finance you require, we will need to share your data with a lender 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 a comprehensive panel of lenders and insurers that we use. A list of these can be provided on request if you wish to view their Fair Processing Notice.

We may also, with your permission, 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.

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.

Use of AI and Automated Decision Making

We use AI and automated decision-making systems to assist the adviser to assess your affordability and source suitable products as part of the contract to provide advice. Any results obtained from these automated decision making systems are subject to review by the adviser, i.e. product sourcing is not solely reliant on the automated decisions. This processing is performed under UK GDPR Article 22(2)(a). We also use AI for identity verification to meet our legal requirement in terms of anti money laundering. This processing is performed under UK GDPR Article 22(2)(b). We use AI to assess and support our Complaints Team when investigating and responding to complaints

How long do we keep your data?

Fluent Money Group businesses are all FCA regulated firms and 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 12 months	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 *

*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 restrict the processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer

require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it

- **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** – you can object to the processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms
- **Rights in relation to automated decision making and profiling** – you have a right to be made aware of this
- **The right to withdraw consent** – this applies where we rely on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

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

Google Firebase

This application includes Google Firebase which collects your device's Advertising ID / Advertising Identifier. We do not use this information or share it with any third party. Firebase is used solely for receiving push notifications if you subscribe to that service.