Fair Processing Notice

Fluent Money is a trading style of Fluent Bridging Ltd (Fluent), a Bridging Loan broker. Our company number is 13198365. Our registered and trading office address is 102 Rivington House, Chorley New Road, Bolton BL6 5UE

This Fair Processing Notice was last updated on the 3rd August 2026. Historic versions of this document are available on request.

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 Fluent Money 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 sourcing websites.
  - Your financial information from your bank available via credit bureau providers and Open Banking with your consent

Why do we need your data?

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

What right do we have to process your data?
Our activities are regulated by the Financial Conduct Authority (FCA www.fca.org.uk), which means we are accountable for the products and services we provide.

Purpose/Activity	**Type(s) of data**	**Lawful basis for processing**
To initially engage with you to discuss your requirements	• 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	• 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	• 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 perform internal audits of our activity by third party auditors across the organisation	• Identity • Contact • Financial	To comply with a legal obligation
To create and maintain access to the My Fluent portal and app	• 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: On-going communications until you are ready to proceed Re-engagement when existing products nears expiry / review protection needs	• 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	• 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	• Identity • Contact	Consent
Record calls to perform checks on the quality of advice our advisers provide to clients	• Identity • Contact • Special Category	Legal & Regulatory Obligation Special Category data - Explicit Consent

Purpose/Activity	Type(s) of data	Lawful basis for processing
To generate reports on business activity for the purposes of performance and capacity planning	• Identity • Contact • Financial • Transaction •	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	• Identity • Technical • Profile & Usage	Consent / Explicit Consent
To use systems including AI and automated decision making to support our services and assist with affordability and product sourcing	• Identity • Contact • Financial •	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. We take all reasonable steps to maintain the security of your data. 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 you require, we will need to share your data with a lender 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 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 our services 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 that we use. A list of these can be provided on request if you wish to view their Fair Processing Notice.

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, contact you in the future by telephone and email to discuss your bridging loan or related relevant products. Your preferences around this contact will be obtained during your initial contact with Fluent Bridging, and you have the right to amend these preferences at any time or withdraw from this service entirely.

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 are the principal firm for Fluent Bridging and are an FCA regulated firm. As such, 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/legal-information/bureau-privacy-notice
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 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.

- **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.
- **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.