

Rooftop Mortgages Privacy Policy and Processing Notice

1. Who is Rooftop Mortgages Limited?

Rooftop Mortgages Limited (“**Rooftop**”) is a UK regulated mortgage lender which administers a range of mortgage portfolio accounts. However, Rooftop does not offer lending for new mortgages. For more information on Rooftop, please visit www.rooftopmortgages.com

2. What is this notice?

At Rooftop we collect personal information about you and are committed to protecting this information and your privacy. Set out below is our Policy and an explanation of how we use, collect and safeguard your personal information.

3. What personal information do we collect?

As part of providing our services, we collect the following personal information:

- name, date of birth, address, email address, telephone number and other contact details which you provide us with on completing your Application Form and whenever you notify us of any subsequent changes.
- bank account details or other payment or financial information which you provide us with on completing your Application Form and whenever you notify us of any subsequent changes.
- a record of any correspondence you have with us, including certain telephone calls which we may be legally required to record. Our telephone system and certain literature will inform you that telephone calls will be recorded.
- medical information which you provide us with for servicing your mortgage; and
- any personal information stated above that you have directly provided to Rooftop’s contracted third parties, such as Mortgage Servicers, Field Agents, Solicitors, Enquiry Agents, Valuers, Credit Reference Agencies and Land Registry.

Each time you use our website, www.rooftopmortgages.com, we will automatically collect certain technical information, including the type of browser you use, the Internet Protocol (IP) address used to connect your computer to the internet, and information about your visit, including the full Uniform Resource Locations (URL), clickstream to, through and from our sites, traffic data and other communication data, the resources that you access, and the information derived from the cookies we place on your mobile device and/or computer.

4. Why do we collect your information?

We collect this information in order to provide the mortgage administration to you, and our use of your information is based on a legitimate business interest we have in being able to provide mortgage administration. Furthermore, the information is required in respect of the mortgage terms and conditions on an ongoing basis pursuant to our contract with you and for regulatory standards and legislation purposes.

In addition, we are required by law to obtain “know your client” information as and this includes certain personal information, as detailed in section 2.

5. How we use your personal information?

We will use the information we hold about you for the following purposes:

- To provide you with mortgage administration, and information you request from us;
- To check your identity;
- So that we can communicate with you as necessary;
- So that we can communicate with our contracted Third Parties, as necessary;
- To assess any application you make to participate in the mortgage administration we provide;
- To update details of your mortgage account with Credit Reference Agencies;
- To carry out analysis about our services and how we might improve them; and
- To notify you about changes to our services.

For example, we will use your information to assess your personal circumstances so that we can help you with any options where you are experiencing some financial difficulty for making your mortgage payments to us.

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6. *Who we share personal information with*

We will only disclose your personal information in accordance with applicable laws and regulations. We will disclose your information to the following third parties:

- Any person with legal or regulatory power over us, such as the Financial Conduct Authority, National Crime Agency or Police that may require disclosure on legal grounds.
- Service providers engaged by us to help us run our business and perform our services. Such service providers will include, for example, cloud storage providers (engaged by us to provide electronic storage facilities for our business data and your information, Mortgage Servicers, Field Agents, Solicitors, Enquiry Agents, Valuers, Credit Reference Agencies and Land Registry.
- Credit Reference Agencies - for the purpose of customer identification and information concerning your financial situation and financial history and the prevention of fraud. We will exchange information with CRA's until the debt has been repaid and CRA's will share your information with other organisations. For more information on how CRA's use personal information please visit;
 - Equifax – www.co.uk/crain
 - Experian – www.experian.co.uk/crain
 - Call Credit – www.callcredit.co.uk/crain

7. *How do we keep your information secure?*

We store the information you provide about yourself in a secure database and take appropriate security measures to protect such information from unauthorised access. For example, we have adopted internal data protection procedures and trained our staff on them with a view to preventing breaches of security. All exchanges of information between you and www.rooftopmortgages.com go through encrypted channels in order to prevent interception of your information.

We sometimes use links to external websites to improve your experience of our site. You need to be aware that the external websites would be owned by other organisations and we do not endorse any such websites and are not responsible for the information contained on or accessible through such websites. Your access and use of external websites is solely at your own risk and we cannot accept responsibility for any information you divulge to a linked website.

8. *How long will we store your information for?*

We generally hold your personal data on our systems for as long is necessary to provide the mortgage servicing and administration to you. We retain your personal data in accordance with the retention periods as detailed in the Financial Conduct Authority 'Mortgage Code of Business – Record Keeping Requirements'.

Additionally, we will discuss the retention of any sensitive information that you share with us.

9. *Your rights*

You have the following rights in relation to how we use your information. If you'd like to exercise these rights please contact us using the contact details listed "***Who can you speak to at Rooftop about this notice/protecting my information?***".

1. Right of access – you have the right to know if we are using your information and, if so, about how we are using it.
2. Right of rectification – you have the right to require us to rectify any errors in the information we hold about you.
3. Right to erasure – you have the right to require us to delete your information if our continued use is not justified.
4. Right to restrict processing - in some circumstances, although you may not be entitled to require us to erase your information, you may be entitled to limit the purposes for which we can use your information.
5. Right of data portability – you have the right to require us to provide you with a copy of your information in a commonly used machine-readable format or to transfer your information directly to another controller (e.g. a third party offering services competing with ours).

10. *Who can you speak to at Rooftop about this notice and protecting my information?*

Questions, comments and the exercise of your rights regarding this notice and your information are welcomed and should be addressed to the Data Protection Officer at 65 Gresham Street, London EC2V 7NQ.

If you wish to make a complaint on how we have handled your personal information, you can contact our Data Protection Officer. If you are not satisfied with our response or believe we are processing your personal information not in accordance with the law you can complain to the supervisory authority in the UK responsible for the implementation and enforcement data protection law: **the Information Commissioner's Office (the "ICO")**. You have the right to complain to the ICO about our collection and use of your information. You can contact the ICO via their website – <https://ico.org.uk/concerns/> - or by calling their helpline – 0303 123 1113.

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Rooftop Mortgages Limited is registered with the ICO, as a Data Controller. Registration number Z9494874.