

TMA Mortgage Club (the Club, we, our, us).

Thank you for taking the time to read this Privacy Notice. You are reading this Privacy Notice because you have either applied to register with the Club or are already associated with the Club in some way. This Privacy Notice explains how we will use and process information that relates to you and your rights in relation to that processing.

We will process your information during:

your initial enquiries to, or preliminary discussions with, the Club and your application to register with us

the period with which you may be associated with us by any contract we may have; and

after any such contract has terminated and therefore the contents of this Privacy Notice will apply to you and the use of your information as the case may be, in some or all of these phases.

Our responsibilities under law and regulation

The Club is a division of a financial services business that is authorised and regulated by the Financial Conduct Authority (FCA). This structure requires us to operate appropriate systems and controls to ensure that we can effectively manage risk in our business. Part of this involves us gathering sufficient information in relation to any firm that wishes to register with us (the Firm) to enable us to judge whether it is suitable for us to enter into a relationship to supply the services that the Club has to offer from time to time. Any checks or assessments we undertake on the Firm are usually completed after the registration information has been submitted.

As a result of working within this highly regulated environment we also take our responsibilities arising under law and regulation with regard to the processing, security and confidentiality of your information very seriously.

What information will the Club process that relates to you?

Firms applying for registration with the Club, and persons with existing Club membership, will provide the Club with personal information relating to

title, name, address and contact information (including e-mail addresses and mobile telephone numbers);

the products and/or services that you supply to customers;
the Firm and details of other persons who may be connected to or engaged by it (Third Parties);

key suppliers of compliance, IT and insurance broking services to you/the Firm;
details of your business/sales performance, both actual and projected;
your preferences as to how you may use our products or services, or how you may wish to receive communications from us;
your sources of business and introducers;

financial and banking information that may be required in connection with the processing or receiving of payments (together Your Information).

Your Information essentially means any information describing or relating to you. Your Information may identify you directly, for example your name, address and the like. Your Information may also identify you indirectly, for example, your employment situation, the firm with which you are associated, or any other information that could be associated with your cultural or social identity.

It is the responsibility of the individual applying to the Club concerned to draw the contents of this Privacy Notice to all Third Parties whose data will be processed by the Club as a consequence of the submission of the application, and who would not otherwise receive their own communication from the Club to consider the contents of this Privacy Notice.

The basis upon which the Club will deal with Your Information

When you apply for membership of our Club, or hold current membership, you will establish a contractual relationship with us. The Club will process Your Information in order to give effect to and to carry out its obligations under any such contract that is entered into between us.

We also have the right to use Your Information at any time provided it is in our legitimate business interest to do so and your rights are not affected. For example, we may need to respond to requests from mortgage lenders and insurance providers relating to your connection with the Club and the business you may place with them, including the processing of any procurement fees or commission. You will also receive information in relation to product innovation, features and terms and conditions either from the Club or directly from mortgage lenders and/or insurance providers.

We will use the data you have provided to communicate with you using a variety of means including email, video calling, WhatsApp and phone calls.

We may at any time, use Your Information to enable us to meet any contractual responsibilities we may owe lenders or providers or for wider compliance with any legal or regulatory obligation to which we might be subject, including any obligations we may have to you. This includes sharing Your Information with all applicable regulators such as the FCA and the Information Commissioner.

How does the Club collect Your Information?

We will collect and record Your Information from a variety of sources, but mainly directly from you. You may provide information to us directly for example, when completing an application or registration form.

In addition Your Information will comprise information from the following sources:

Companies House
FCA

Mortgage lenders or insurance providers

What happens to Your Information when it is disclosed to the Club?

In the course of handling Your Information we will:

record and store Your Information on our systems run on secure servers
provide duly authorised employees and consultants within, or engaged, by us (or by any member of the LSL Property Services PLC group of companies who may provide services to us) with access to Your Information as necessary for the purposes of carrying out our assessment of you and/or the Firm either prior to your Club membership being effected and then subsequently to give effect to any contract that has been entered into between you/the Firm and the Club, including, but not limited to, the payment of commissions, to provide you with access to systems and services as are necessary to enable you to benefit from your Club membership and to operate any business development or sales support initiatives we may consider to be in our legitimate interests to operate, such as conferences and recognition and reward initiatives

use, and where appropriate transmit, Your Information to respond to any request from the FCA, the Financial Ombudsman Service, HMRC, the Office of the Information Commissioner or any other regulatory, law enforcement or governmental body; and

need to access and process Your Information to deal with enquiries received from mortgage lenders and insurance providers that relate to the service that you may provide to customers, including the payment of any commission or fees to us that may be linked to the product you have arranged and that may be due to you.
Security and retention of Your Information.

Your privacy is important to us and we will keep Your Information secure in accordance with our legal responsibilities. We will take reasonable steps to safeguard against Your Information being accessed unlawfully or maliciously by a third party, accidentally lost, destroyed or damaged.

We also expect you to take reasonable steps to safeguard your own privacy when transferring information to us, such as not sending confidential information over unprotected email, ensuring email attachments are password protected or encrypted and only using secure methods of postage when original documentation is sent to us.

Your Information will be retained by us in accordance with the Club data retention policy published separately and accessible via the Club or on request. To confirm, your information will be held for your period of membership and for 3 years thereafter.

Your rights in relation to Your Information

request copies of Your Information that is under our control

ask us to further explain how we use Your Information

ask us to correct, delete or require us to restrict or stop using Your Information (details as to the extent to which we can do this will be provided at the time of any such request)

ask us to send an electronic copy of Your Information to another organisation should you wish
withdraw any consent you may have provided to us processing Your Information (and any implication of you exercising this right will be explained to you at the time of any such request)

Sharing and transferring Your Information

From time to time Your Information will be shared with or transferred to:

mortgage lenders and insurance providers

contractors or suppliers who we may engage to assist us with the provision of any services by the Club

suppliers of IT systems, software, hardware, sourcing systems, quotation engines, electronic ID providers, credit reference providers and any other person who, in each case, we consider need to process Your Information

our professional indemnity insurers, brokers, claims handlers and legal advisers and any other person who may provide professional services in connection with the handling of a complaint, litigation or investigation or in connection with the interpretation or enforcement of the terms of any contract we may have entered into with you

any person we may engage in connection with any investigation to detect, prevent or investigate financial crime, including those that may be carried out by or in conjunction with mortgage lenders, insurance providers and regulators
third party venue, catering and/or event management providers who assist us with the operation and delivery of regional and Club-wide events; and
LSL Property Services plc, the ultimate parent company of the Club, and any associated company who may provide services to the Club from time to time in each case for the purposes set out in this Privacy Notice, i.e. to enable us to comply with our contract that we might enter into with you, to comply with our legal obligations to you, to further our legitimate interests and to detect or prevent financial crime.

These parties may be located in the UK or elsewhere in the world where different privacy laws may apply which may not offer the same level of protection as UK law. We only make these arrangements or transfers where we are satisfied that adequate levels of protection are in place to protect any information held in that country and that the service provider acts at all times in compliance with applicable privacy laws.

How to make contact with the Club in relation to the use of Your Information
If you have any questions or comments about this document, or wish to make contact in order to exercise any of your rights set out within it please contact:

TMA Mortgage Club Data Protection Officer: Raj Lyall

E-mail: dpo@primis.co.uk

If we feel we have a legal right not to deal with your request, or to action it in different way to how you have requested, we will inform you of this at the time.

You should also make contact with us as soon as possible on you becoming aware of any unauthorised disclosure of Your Information so that we may investigate and fulfil our own regulatory obligations.

If you have any concerns or complaints as to how we have handled Your Information you may lodge a complaint with the UK's data protection regulator, the ICO, who can be contacted through their website at <https://ico.org.uk/global/contact-us/> or by writing to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

TMA Club is a trading name Advanced Mortgage Funding Limited.

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