Data Privacy Notice | We care about your data

Because we care about you and the information you share with us, we wanted to provide as much detail as possible about what we do with the data we hold about you.

You can use this page to see all the information available at a glance, and to jump straight to the section you're looking for by simply clicking the links.

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Our commitments to you are:

We protect your personal information Keeping your personal information safe and secure is a priority. We use safeguards such as firewalls and encryption to help keep your personal information safe.	**We do not sell your personal information** We sometimes share your information with other companies to provide the products and services you want. It will only be used for the specific purposes that we agree in advance, not for marketing, additional products or services.	**We use your information to improve our products and services** We use personal information to continually improve our services and create better investment products to offer you.

In this Privacy Notice you can find out more about:

- What personal information we collect and use;
- How we collect, use and share personal information
- Your rights in relation to any personal information we hold about you; and
- How you can contact us with any questions you may have about information privacy.

We may amend this Privacy Notice from time to time to keep it up to date with current legal requirements, the way we operate our business or if we are advised to do so by our regulator. We will always inform you of any significant changes to the way we use your personal information when this deviates from information originally provided by us when the data was first collected.

Who we are

Capricorn Financial Mortgages Limited collects, uses and is responsible for certain personal data about you. When *we* do so *we* are required to comply with *data protection regulation* and *we* are responsible as a *data controller* of that personal data for the purposes of those laws.

When *we* mention " Capricorn Financial Mortgages", "*we*", "*us*" or "*our*" we are referring to Capricorn Financial Mortgages Limited.

We provide you with *intermediary services* in relation to the *products*. We act as a broker and do not lend money ourselves. We help you find and apply for mortgage products from third-party lenders and your mortgage agreement is always with the lender, who is responsible for the decision and terms.

Capricorn Financial Mortgages are an appointed representative of Sesame Limited. Sesame Limited is authorised and regulated by the Financial Conduct Authority. Sesame Limited's Financial Services Register number is 150427.

We and Sesame Limited have certain shared systems (and so shared access to your personal data). This means that in respect of certain personal data of yours, *we* and Sesame Limited will be joint *data controllers*.

The manner in which Sesame Limited will process your personal data is set out in a separate privacy notice which *we* will provide you with at the start of *our* engagement. If you require a further copy of this privacy notice, please contact Sesame Limited at dataprivacy@sbg.co.uk or Data Protection Officer, Sesame Limited, Fourth Floor, Jackson House, Sibson Rd, Sale M33 7RR.

What personal information do we collect and use?

Personal information we collect and use

In the course of our intermediary services we may collect the following personal data when you provide it to us:

- contact information
- identity information
- financial information
- payment information
- employment status
- lifestyle information
- health information
- data about criminal convictions or offences
- details of any vulnerability
- details of your dependents and/or beneficiaries under a policy (If you are providing information about another person we expect you to ensure that they know you are doing so and are content with their information being provided to us. You might find it helpful to show them this privacy notice and if they have any concerns please contact us in one of the ways described below.)
- product details

Information collected from other sources

We also obtain personal data from other sources in the course of our monitoring, oversight and complaint handling activities. Most of this information is or was provided to us by your adviser. It is their responsibility to make sure they explain that they will be sharing personal data with Sesame and, where necessary, ask permission before sharing information with us.

The personal data we obtain from other sources may include the following:

- From your firm:
- contact information
- identity information
- financial information
- performance records

From your previous network or employer (if applicable):

- contact information
- identity information
- financial information
- performance records
- employment history/network history

From third party referees nominated by you (where you were previously self-employed):

- contact information
- identity information
- From product providers:
- identity information
- performance records

From identification and verification checking agencies:

- identity information
- sanction check information
- From credit monitoring agencies:
- contact information
- financial information
- From employment screening agencies:
- data about criminal convictions or offences

How we collect, use and share personal information

We are committed to respecting and protecting your personal information in accordance with applicable data protection laws.

What is our legal basis for processing your Personal Data?

Rationale/Reason for Processing	Lawful Basis for Processing	Third party recipients linked to that activity
• to provide you with *intermediary services* • to assist in the administration of any *products* you have obtained through *us*	Performance of a contract	Sesame Limited
• to apply for decisions in principle for mortgage products and/or quotations for protection and/or general insurance products on your behalf • to apply for *products* on your behalf	Performance of a contract	*Lenders/product providers* External supplier(s) of software services through which *we* review, source and apply for decisions in principle, quotations and/or *products* on your behalf

Rationale/Reason for Processing	Lawful Basis for Processing	Third party recipients linked to that activity
• to refer you to third party advisers to provide you with advice	Legitimate interests	Capricorn Wealth Management Limited trading as Capricorn Commercial and Capricorn International
• to manage complaints	Compliance with a legal obligation	Sesame Limited *Our* external solicitors *Our* professional indemnity insurers and insurance adviser
• to manage legal claims	Legitimate interests – *we* have a legitimate interest in protecting *ourselves* from breaches of legal obligations owed to *us* and to defend *ourselves* from litigation. This is needed to ensure that *our* legal rights and interests are managed appropriately	Sesame Limited *Our* external solicitors *Our* professional indemnity insurers and insurance adviser
• to share with Sesame Limited as the company responsible for making sure that all sales *we* make to you and advice *we* give to you are compliant with the rules and regulations that apply to financial services in the UK and with their policies and procedures	Compliance with a legal obligation	Sesame Limited
• to obtain feedback from you on the service you have received from *us*	Legitimate interests – *we* have a legitimate interest in operating *our* business. This includes ensuring that the service we provide is of a satisfactory standard	Sesame Limited External supplier(s) of software services to obtain feedback from you
• to retain records of any services or advice provided to you in accordance with *our* regulatory obligations	Compliance with a legal obligation	External supplier(s) of data storage and data hosting services to retain records on *our* behalf

Rationale/Reason for Processing	Lawful Basis for Processing	Third party recipients linked to that activity
• to retain records of any services or advice provided to you by your *adviser* in order to defend potential legal claims or complaints	Legitimate interests	External supplier(s) of data storage and data hosting services to retain records on *our* behalf
• to provide you with details of products and services from us and third parties that may be of interest to you in accordance with your preferences. For more information see 'Marketing' below	Legitimate interests	n/a
• to detect, prevent and investigate fraudulent applications for products • to undertake investigations into allegations of misconduct and/or criminal offences • to notify the relevant authorities of any suspicious activity following an investigation undertaken by us into allegations of misconduct and/or criminal offences	Compliance with a legal obligation. We also consider that we have a legitimate interest in protecting ourselves, other parties and the financial services industry more widely in detecting, preventing and investigating financial crime and/or misconduct	The Financial Conduct Authority Lenders/product providers Sesame Limited National Crime Agency (NCA) Police HMRC

Rationale/Reason for Processing	Lawful Basis for Processing	Third party recipients linked to that activity
• to undertake anti-money laundering, identification and verification checks, including assessment of your sanction check information (any personal data obtained for the purposes of meeting with The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 will only be processed for the purposes of preventing money laundering or terrorist financing, unless the use of the data is permitted by or under another enactment other than those Regulations, or we have another lawful basis for processing it)	Compliance with a legal obligation	Sesame Limited External supplier(s) to conduct anti-money laundering, identification and verification checks on our behalf Lenders/product providers
• to evidence satisfaction of any request made by you in accordance with your rights under data protection regulation	Compliance with a legal obligation	Information Commissioner's Office

How we keep your personal information secure

We consider security and the required technical and organisational measures required to comply with Article 5(1) of the UK GDPR meaning that it will ensure personal data is processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

The business has an extensive cyber and information security framework and associate policies that ensure the technical and organisational measures are always kept up to date. This includes that of our suppliers and their responsibilities as processors and sub-processors.

Retaining personal information on our systems

We will hold your personal data for differing periods of time depending upon the reason we have for processing it. These retention periods are set out below.

We will hold your personal data for differing periods of time depending upon the reason we have for processing it. The following criteria are used to determine data retention periods for your personal data:

- **Retention in case of queries** – Sesame will retain your personal data for as long as Sesame reasonably consider it necessary to deal with your queries (e.g. any questions you may have in relation to the services).
- **Retention in case of claims** – Sesame will retain your personal data for as long as Sesame reasonably consider that you might legally bring a claim against us.
- **Retention in accordance with legal and regulatory requirements** – Sesame will retain your personal data after Sesame have ceased providing services to you for as long as Sesame are required/permitted to retain it for based upon our legal and regulatory obligation.

All record retention rights are subject to review, in line with the SBG data handling policy and must comply with legal and regulatory requirements. You have the right to request your data be removed, where appropriate,

Type of Record	Retention Period
Customer file containing a record of any intermediary services provided by us	For as long as we reasonably consider that: • we may need to deal with your queries • you might legally bring a claim against us
Complaint file containing a record of any claim you have brought against us	For as long as we reasonably consider that you might legally bring an additional or repeat claim against us
Marketing lists	Marketing lists are retained for 2 years after the completion of a contract or if there has been no contact within this period
Results of anti-money laundering, identification and verification checks, including assessment of your **sanction check information**	For as long as we are required/permitted to retain this personal data based upon our legal and regulatory obligations
Fraud and financial crime files	For as long as we reasonably consider that: • we are required/ permitted to retain this personal data based upon our legal and regulatory obligations • they may be required in the establishment, exercise or defence of legal claims
Records of satisfaction of any request made by you in accordance with your rights under data protection regulation	3 years from the date the request was satisfied

Marketing

We may use personal data we hold about you to help us identify, tailor and provide you with details of products and services from us that may be of interest to you. We will only do so where we have obtained your consent and will do so in accordance with any marketing preferences you have provided to us.

In addition, where you provided your consent, we may provide you with details of products and services of third parties where they may be of interest to you.

You can opt out of receiving marketing at any time. If you wish to amend your marketing preferences please contact us:

By phone: +44 (0)203 111 0900

By email: info@capricornfinancial.co.uk

By Post: 1 Queen Caroline Street, London, W6 9YN

In addition, you can opt out of receiving marketing at any time by clicking the 'unsubscribe' link at the bottom of marketing email.

Transfer of your information out of the EEA

Sesame share your data with approved third parties and parties within the Sesame Bankhall Group to ensure that you receive the best possible service. Sesame do not sell or pass on your data for marketing purposes, it is only used for the service provision stated or for the marketing of new services within Sesame or its parent Sesame Bankhall Group, where there is a legitimate interest in giving you additional services or advise.

Where possible all Sesame data is stored within the EEA but may need to be accessed or stored in a country outside of the EEA that does not provide protections in line with GDPR. In these cases Sesame relies on the International Data Transfer Agreement (IDTA) to ensure adequate protections are in place in line with required legislation.

These controls are audited to ensure they are in place in lie with SBG policy and UK GDPR and in the majority of cases the processing activity is undertaken by an entity within the Sesame Bankhall Group and so is within direct control of Sesame and all policy and controls we give data in the EEA.

Your rights

Under UK GDPR, you have the following rights:

- **Right to be Informed** – You have the right to be informed about the collection and use of your personal data
- **Right of Access** – You have the right to access and receive a copy of your personal data and other supplementary information
- **Right to Rectification** – You have the right to have inaccurate personal data rectified, or completed if it is incomplete
- **Right to Erasure** – You have the right to have personal data erased
- **Right to restrict processing** – You have the right to restriction or suppression of your personal data
- **Right to data portability** – You can request a copy of data and/or to reuse this data for your own purposes across different services
- **Rights relating to automated decision making including profiling** – You have specific rights when automated decisions are made about you or you are profiled as part of a service. More information on this right can be sought through the group DPO.

To exercise these rights, contact us using the details provided at the beginning of this Data Privacy Notice or info@capricornfinancial.co.uk

We will respond within 1 calendar month unless the request is particularly complex and then an extension with a maximum time of 3 calendar months, may be requested. You will be informed of any extension or issues in resolving your request.

To access your personal information

You can ask us to confirm whether or not *we* have and are using your personal data. You can also ask to get a copy of your personal data from *us* and for information on how *we* process it.

To rectify or erase your personal information

You can ask that we rectify any information about you which is incorrect. We will be happy to rectify such information but would need to verify the accuracy of the information first.

You can ask that we erase your personal data if you think we no longer need to use it for the purpose we collected it from you.

You can also ask that we erase your personal data if you have either withdrawn your consent to us using your information (if we originally asked for your consent to use your information), or exercised your right to object to further legitimate use of your information, or where we have used it unlawfully or where we are subject to a legal obligation to erase your personal data.

We may not always be able to comply with your request, for example where we need to keep using your personal data in order to comply with our legal obligation or where we need to use your personal data to establish, exercise or defend legal claims.

To restrict or object to how we use your personal information

You can ask that we restrict our use of your personal data in certain circumstances, for example:

where you think the information is inaccurate and we need to verify it;

where our use of your personal data is not lawful but you do not want us to erase it;

where the information is no longer required for the purposes for which it was collected but we need it to establish, exercise or defend legal claims; or

where you have objected to our use of your personal data but we still need to verify if we have overriding grounds to use it.

We can continue to use your personal data following a request for restriction where we have your consent to use it; or we need to use it to establish, exercise or defend legal claims, or we need to use it to protect the rights of another individual or a company.

To request a transfer of personal information

You can ask us to provide your personal data to you in a structured, commonly used, machine-readable format, or you can ask to have it transferred directly to another data controller (e.g. another company).

You may only exercise this right where we use your personal data in order to perform a contract with you, or where we asked for your consent to use your personal data. This right does not apply to any personal data which we hold or process outside automated means.

To withdraw your consent

Subject to certain legal and contractual restrictions and reasonable notice, you may refuse or withdraw consent to the processing of your personal information at any time by contacting us (e.g. direct marketing or cookies). We will advise you if withdrawing your consent may affect our ability to respond to your needs.

Automated decision making and profiling

If we made a decision about you based solely by automated means (i.e. with no human intervention), and the decision made by us produces a legal effect concerning you, or significantly affects you, you may have the right to contest that decision, express your point of view and ask for a human review. These rights do not apply where we are authorised by law to make such decisions and have adopted suitable safeguards in our decision making processes to protect your rights and freedoms.

To obtain a copy of our safety measures for transfers outside of Europe

You can ask for a copy of, or reference to, the safeguards *we* have put in place when your personal data is transferred outside of the European Economic Area. *We* are not required to share details of these safeguards where sharing such details would affect *our* commercial position or create a security risk. [delete if no information is transferred outside of Europe]

Data anonymization and aggregation

Your personal data may be converted into statistical or aggregated data which can't be used to identify you, then used to produce statistical research and reports.

How to contact us

You can contact us for more information. If you are not satisfied with the level of information provided in this privacy notice, you can ask us about what personal data we have about you, what we use your information for, who we disclose your information to, whether we transfer it abroad, how we protect it, how long we keep it for, what rights you have, how you can make a complaint, where we got your data from and whether we have carried out any automated decision making using your personal data.

If you would like to exercise any of the above rights, please:

email or write to Compliance Department at compliance@CapricornFinancialMortgages.co.uk or 1 Queen Caroline Street, London, W6 9YN;

let us have enough information to identify you, e.g. name, address, date of birth;

let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and

let us know the information to which your request relates.

The supervisory authority

We ask that you please attempt to resolve any issues with us before reporting to the ICO

If you are not happy with the way we deal with any complaints or have any further concerns or complaints, you have the right to lodge a complaint with the UK's data protection regulator, the Information Commissioners Office (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

ico.
Information Commissioner's Office