



## Data Protection

Caboodle Financial Services Limited (Caboodle) receives, holds and processes information relating to individuals ("**personal data**") in accordance with the Data Protection Act 2018. In doing so, Caboodle is committed to maintaining the privacy and protection of all personal data collected in pursuance of its broker and loan services. Caboodle is further committed to ensuring that its website is absolutely secure in their collection and use of your personal information. All entities that comprise Caboodle Financial Services Limited are registered on the public register of data controllers maintained by the Information Commissioner.

Caboodle Financial Services Ltd is an appointed representative of PRIMIS Mortgage Network (PRIMIS), a trading name of Advance Mortgage Funding Ltd which is authorised and regulated by the Financial Conduct Authority. PRIMIS is only responsible for the service and quality of advice provided to you in relation to mortgages, protection insurance and general insurance products. Any other product or service offered by Caboodle Financial Services Ltd may not be the responsibility of PRIMIS and may also not be subject to regulation by the Financial Conduct Authority. The Financial Conduct Authority does not regulate some forms of Buy to Let.

The guidance and/or advice contained in this website is subject to UK regulatory regime and is therefore restricted to consumers based in the UK.

You voluntarily choose to provide personal details to us via this website. Personal information will be treated as confidential by us and held in accordance with the Data Protection Act 2018. You agree that such personal information may be used to provide you with details of services and products in writing, by email or by telephone.

The general principles under the Data Protection Act 2018 that Caboodle Financial Services Limited will follow at all times are set out below.

### 1. CABOODLE'S COLLECTION AND USE OF YOUR PERSONAL DATA

(i). Caboodle Financial Services Limited collects and processes your personal data in order to provide you with a broker service

(ii). As a credit broker Caboodle Financial Services Limited will use your personal data provided on your completed enquiry or application form to carry out the following functions:

- Process the application itself by reference to lender information
- Provide your information to a lender for them to assess your suitability
- Provide your information to a credit reference agency for searches to be made
- Complete the credit agreement or mortgage deed on behalf of the lender

- Pass your application in its entirety to an alternative broker when Caboodle cannot assist in arranging finance for you

(iii). Caboodle may also use your information (with your consent where applicable) to:

- Offer you other products or services which are available from or via Caboodle Financial Services Limited
- Contact you in the future to offer you products or services that we feel may be of interest to you
- Enable us to pass your details to another broker in the future with a view to them offering you products or services they feel may be of interest to you
- Permit access to your information by any regulatory authority where required to by law and to ensure that we are complying with all regulatory requirements when processing your data

(iv). We will keep your information for as long as you allow us to do so and we will contact you on a regular basis to check that you still consent to being contacted by us regarding our products and services

(v). Lenders to whom the application is passed will make wider use of the information than a broker. If you have received any lender documents, they should include a statement telling you what they will do with the information, or telling you where to look to find out what use they will make of it. This statement will usually be near any signature box, or clearly placed on the front page. If the information is not by the signature box there may be an "information padlock" sign like the one shown below drawing your attention to where the information is



(vi). Caboodle and almost all brokers or lending companies will check the information supplied on loan applications or mortgage enquiries with data held by credit reference agencies. The lender may search on more than one occasion. Every time a search is made it is recorded by the agency and disclosed to other organisations on any later searches

Lenders will use the information obtained in the credit reference searches to help them assess the application and they may use the result of any search in a credit scoring system. A credit scoring system is a system by which points are given for various factors like your age, your job or even for information obtained from a credit reference agency, such as how you have repaid previous or existing credit. Lenders use different methods of scoring depending upon their interpretation of the importance of different factors and the level of risk they are willing to accept.

The lender may check your details with the credit reference agency or with other agencies (see 'other agencies' section) to satisfy itself that all the details on the application are true, and that the application has really been made by you. If it suspects information is false or inaccurate it may report it to a fraud prevention agency. Please ensure the information is true as lending companies will check with fraud prevention agencies and if you give false or inaccurate information, and the lender suspects fraud, it will record this.

(vii). Sometimes a lender may not wish to lend. This may be for a number of reasons. The lender may think you cannot afford the loan or mortgage, or your property may not be of sufficient value. A lender does not have to tell you exactly why you have been refused a loan but you can ask them for the name and address of any credit reference agency used and they will supply this information free of charge.

If you are refused credit because of a computerised credit scoring system you can ask the lender for an explanation of how their credit scoring works (this applies only if the decision has been made on the basis of a computerised system alone). The lender may charge a small fee for providing this information. You also have the right to require a personal, non-automated review of the decision.

It is however important to remember that *Nobody has a right to receive finance.*

*Finance is always granted at the discretion of the lending company.*

**(viii). Use of information once finance has been granted by a lender**

All lending companies keep information about their customers in their own records. This will include all the initial information given by you, and extra information about how your account has been conducted and any other dealings between you and the lender.

Lenders will record the conduct of any loan or mortgage throughout its lifetime, including how punctual the payments are made and other information, with one or more of the credit reference agencies. This enables them, and others, to make decisions about credit and credit-related services for you and other members of your household including decisions on motor and household credit, life and other insurance proposals and insurance claims.

Information may also be provided to the 'other agencies' listed below. These will help lenders and other subscribers to those agencies to trace debtors, recover debt, prevent fraud and to check your identity to prevent money laundering. In particular, any difference between the information given by you or your broker and any later information discovered by the lender is likely to be noted.

Lenders may also use your information for statistical analysis about credit, insurance and fraud. This may be done by them or by third parties contracted to do the work for them. If they use a contractor, they are obliged to ensure that your data is properly secure. Many lenders will also need to give information about you and your account to their bankers, other providers, insurers and re-insurers of funding for their lending or any other product they have offered to you.

If your broker or lender intends to use your information for any purposes not included above, it will explain this in its documents.

*Brokers and lenders are under a legal duty to keep all the information they hold accurate and up to date.*

*The agencies do not keep "blacklists" nor do they give any opinion about whether or not credit should be granted. They do have a duty to keep information up to date and accurate.*

#### **(ix). Credit Reference Agencies**

The main credit reference agencies are:

##### **Experian Limited**

Consumer Help Services  
PO Box 7710  
Nottingham  
NG80 7WE  
[www.experian.co.uk](http://www.experian.co.uk)

##### **Equifax plc.**

Credit File Advice Centre  
PO Box 1140  
Bradford  
West Yorkshire  
BD1 5US  
[www.equifax.co.uk](http://www.equifax.co.uk)

##### **Call Credit Limited**

Consumer Services Team  
One Park Lane  
Leeds  
LS3 1WZ  
Tel: 0870 060 1414  
[www.callcredit.co.uk](http://www.callcredit.co.uk)

All lending companies use one or more of these agencies. Credit reference agencies keep a wide range of information. This includes information from the electoral roll (sometimes known as the voters roll) and records of most county court judgements and bankruptcies. They also retain information relating to previous and existing credit and a record of searches made against the file. The lenders share information through the agencies by providing a history of how payments are being made or have been made during the life of the account. Loan information is usually held on file for 6 years. Details of the voters roll may be held for much longer. Information about other credit searches is kept for up to two years.

#### **Other Agencies**

##### **Fraud Prevention**

Reports relating to fraud and fraud avoidance are also available to most lenders – these contain information indicating that fraud, or attempted fraud, has been notified by a lender. The information might not directly relate to you, it might relate to someone who has tried to impersonate you. Data may be used to help make decisions on credit and insurance proposals for you and members of your household.

If false or inaccurate information is provided and fraud is identified, details will be passed to fraud prevention agencies. Law enforcement agencies may access and use this information. We and other organisations may also access and use this information to prevent fraud and money laundering for example when:

- Checking details on applications for credit and credit related or other facilities
- Managing credit and credit related accounts or facilities
- Recovering debt
- Checking details on proposals and claims for all types of insurance
- Checking details of job applicants and employees

Please contact The Compliance Department, PRIMIS MORTGAGE NETWORK, Shire House, Birmingham Road, Lichfield, Staffs WS14 9BW or telephone on 0330 3030235 if you want to receive details of the relevant fraud prevention agencies.

We and other organisations may access and use from other countries the information recorded by fraud prevention agencies.

### **CML Repossession Register**

The Council of Mortgage Lenders, Repossession Register is available to its members through the main credit reference agencies. If you have had a property repossessed or have given it up voluntarily this will show on the register.

### **GAIN**

A file may also show a "gone away" marker indicating that a member of the "Gone Away Information Network" has reported that they cannot trace a customer who is in arrears with payments. Alternatively, the marker may indicate a new address which the "gone away" has been traced to.

### **HUNTER**

Files in this register contain detailed information on applications made and loans granted. It is aimed at tracing fraudsters who use different combinations of information to obtain credit in a dishonest way. It checks and counter checks information given on application forms that appear to contain similar information.

If your broker or lender uses any of the above agencies they will be able to confirm their contact addresses. CIFAS information is intended to warn lenders and act as a protection for innocent customers.

(x). If you wish to see the information contained on a credit reference agency file you can do so by writing to the relevant agency. The agency must respond within 7 working days. There is usually a small fee required for this service. If your credit reference file contains information about other people with whom you have no financial connection or if it contains information which is incorrect

you can ask for the entry to be corrected, removed, or have a note put on the file explaining why you think the information is wrong. The agency will not remove correct information.

The Information Commissioner provides a useful leaflet which explains how to request changes to your credit reference file. The easy to read leaflet includes examples of letters and details of various actions you may take to amend a file. You can obtain a copy of the free leaflet by writing to:

**No Credit Leaflet**

P.O. Box 99

Nelson

BB9 8GS

Information is also available at [www.dataprotection.gov.uk](http://www.dataprotection.gov.uk)

Should you wish to obtain a copy of the personal data we hold on you please write to: The Compliance Department, PRIMIS Mortgage Network, Shire House, Birmingham Road, Lichfield, Staffs WS14 9BW enclosing you payment of £10 for our administration costs. As soon as we are satisfied as to your identity we will send you, within 40 days, a copy of all the data we hold concerning you. Please contact us at the same address if you have any reason to believe the data we hold on you is inaccurate.

**(xi). Cookies**

Like many websites, when you visit our website we may issue certain 'cookies'. Please see our 'Cookie Policy' for full details

**(xii). Call Recording**

Calls to our offices may be recorded; this is for our protection and yours. Calls can be used for training and monitoring purposes and may be used in the unlikely event of a complaint.

**2. COLLECTION AND USE OF PERSONAL DATA**

Caboodle Financial Services Limited shall collect and process all personal data in respect of its data subjects in line with the following data protection principles:

- (i). Caboodle Financial Services Limited shall collect and process all personal data fairly and lawfully
- (ii). Caboodle Financial Services Limited shall only use personal data for the purposes stated at the time of its collection and shall seek the customers consent before using the personal data for any other purpose with the exception of purposes for which Caboodle Financial Services Limited is required to process data by any legislation or regulatory requirement
- (iii). Caboodle Financial Services Limited shall ensure that all personal data collected is adequate, relevant and not excessive, for the purposes for which it is processed
- (iv). Caboodle Financial Services Limited shall ensure that all personal data is accurate and where necessary kept up to date

(v). Caboodle Financial Services Limited shall ensure that all personal data is retained for no longer than is necessary for the purpose for which it is being processed

(vi). Caboodle Financial Services Limited shall ensure that personal data is processed in accordance with the rights of the data subject

(vii). Caboodle Financial Services Limited shall obtain the data subjects prior written consent before processing sensitive personal data

(viii). Caboodle Financial Services Limited shall ensure that appropriate technical and organisation measures are taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data

### **3. RIGHT TO INFORMATION**

Caboodle Financial Services Limited shall ensure that all data subjects will benefit from the following rights:

(i). The right to request information as to whether or not personal data relating to the data subject is being processed by Caboodle Financial Services Limited and the right to receive a response to such a request

(ii). The right to request information from Caboodle Financial Services Limited, as to the purpose of the process of personal data

(iii). The right to request information from Caboodle Financial Services Limited as to the recipients of any personal data where personal data has been disclosed

(iv). The right to receive, in an intelligible and permanent form, copies of personal data undergoing process and any available information as to its source

(v). Caboodle Financial Services Limited shall ensure that any reasonable requests for information will be met without constraint

### **4. RIGHT TO OBJECT**

(i). The data subject shall have a right to object at any time on legitimate grounds in relation to the processing of his or her personal data by Caboodle Financial Services Limited

(ii). Where a data subject has objected to the processing of personal data relating to him or her, and such objection is justified, Caboodle Financial Services Limited shall desist from the processing of the personal data at issue in respect of that data subject until further notice

### **5. RETENTION POLICY AND SECURITY OF PROCESSING**

(i). Caboodle Financial Services Limited shall implement technical and organisational measures to protect personal data against accidental or unlawful destruction, or accidental loss or alteration, and unauthorised disclosure or access (in particular where the process involves transmission of personal data over a network) and against all other unlawful forms of processing

(ii). Caboodle Financial Services Limited shall ensure a level of security appropriate to the risk represented by the process and nature of their personal data to be protected, having all due regard to the state of the art and costs measures

(iii). Data bases which contain sensitive personal data shall be protected by fire walls and access passwords

## **6. OUTSOURCING TO A DATA PROCESSOR**

(i). Where personal data has been outsourced to a third party, such outsourcing shall be undertaken in line with a written agreement between Caboodle Financial Services Limited and the third party in question and shall specify the rights and obligation of each party and in particular shall state that the third party shall have adequate security measures in place and shall only process personal data on the specific written instructions of Caboodle Financial Services Limited

## **7. DISCLOSURES**

(i). Caboodle Financial Services Limited shall not sell, rent, share, trade or disclose any personal data it keeps relating to a data subject to any other parties without the prior written consent of the relevant data subject, with the exception of any suppliers with which Caboodle Financial Services Limited have engaged to provide services and are involved in the processing of personal data on Caboodle Financial Services Limited's behalf

(ii). Notwithstanding the above, Caboodle Financial Services Limited reserves the right to disclose personal data to the police, and relevant regulatory or other bodies, as required by law or regulation and in the event of the sale of its business (or part thereof) where it is necessary to do so in order to affect the sale of a data subject's personal data in connection with such a business sale

For further details please see our 'Customer Privacy Notice'.

### **Contacting Us**

If you have any questions about our Data Protection Policy, the Terms of Use or any other aspect of this website please contact us at:

Caboodle Financial Services Limited, Mere Green House, 46-48 Mere Green Road, Sutton Coldfield, West Midlands B75 5BT      Tel: 0800 151 2407