

# MAGELLAN

## HOMELOANS

### PRIVACY NOTICE

### HOW WE USE YOUR PERSONAL INFORMATION

This privacy notice is to let you know how we promise to look after your personal information. This includes what you tell us about yourself, what we learn by having you as a customer, and the choices you give us about what marketing you want us to send you. This notice explains how we do this and tells you about your privacy rights and how the law protects you.

Your information will be held by Magellan Homeloans. More information on Magellan Homeloans can be found at [www.magellanhomeloans.co.uk](http://www.magellanhomeloans.co.uk)

#### Our Privacy Promise

We promise:

- To keep your data safe and private.
- Not to sell your data.
- To allow you to manage and review the ways we communicate with you.

#### Data Protection Law

This notice sets out your rights under UK Data Protection Law.

Who we are

- Our registered Office is Ashcombe House, 5 The Crescent, Leatherhead, Surrey, KT22 8DY
- Magellan Homeloans is authorised and regulated by the Financial Conduct Authority. Our registration number is 774311
- You can find out more about us at [www.magellanhomeloans.co.uk](http://www.magellanhomeloans.co.uk)
- Or you can call us on 03303 355777
- Or write to:

The Compliance Department  
Magellan Homeloans  
Ashcombe House,  
5 The Crescent,  
Leatherhead,  
Surrey, KT22 8DY

#### How the law protects you

As well as our Privacy Promise, your privacy is protected by law. This section explains how that works.

Data Protection law says that we are allowed to use personal information only if we have a proper reason to do so. This includes sharing it outside Magellan Homeloans. The law says we must have one or more of these reasons:

- To fulfil a contract we have with you, or
- When it is our legal duty, or
- When it is in our legitimate interests, or
- When you consent to it.

A legitimate interest is when we have a business or commercial reason to use your information. But even then, it must not unfairly go against what is right and best for you. If we rely on our legitimate interest, we will tell you what that is.

Here is a list of all the ways that we may use your personal information, and which of the lawful reasons we rely on to do so. This is also where we tell you what our legitimate interests are.

What we use your personal information for:	Our reasons	Our legitimate interests
<ul style="list-style-type: none"> <li>To manage our relationship with you or your business.</li> <li>To develop new ways to meet our customers' needs and to grow our business.</li> <li>To develop and carry out marketing activities.</li> <li>To study how our customers use products and services from us and other organisations.</li> <li>To provide advice or guidance about our products and services.</li> </ul>	<ul style="list-style-type: none"> <li>Your consent.</li> <li>Fulfilling contracts.</li> <li>Our legitimate interests.</li> <li>Our legal duty</li> </ul>	<ul style="list-style-type: none"> <li>Keeping our records up to date, working out which of our products and services may interest you and telling you about them.</li> <li>Developing products and services, and what we charge for them.</li> <li>Defining types of customers for new products or services.</li> <li>Seeking your consent when we need it to contact you.</li> <li>Being efficient about how we fulfil our legal duties.</li> </ul>
<ul style="list-style-type: none"> <li>To develop and manage our brands, products and services.</li> <li>To test new products.</li> <li>To manage how we work with other companies that provide services to us and our customers.</li> </ul>	<ul style="list-style-type: none"> <li>Fulfilling contracts</li> <li>Our legitimate interests.</li> <li>Our legal duty.</li> </ul>	<ul style="list-style-type: none"> <li>Developing products and services, and what we charge for them.</li> <li>Defining types of customers for new products or services.</li> <li>Being efficient about how we fulfil our legal and contractual duties.</li> </ul>
<ul style="list-style-type: none"> <li>To deliver our products and services.</li> <li>To make and manage customer payments.</li> <li>To manage fees, charges and interest due on customer accounts.</li> <li>To collect and recover money that is owed to us.</li> </ul>	<ul style="list-style-type: none"> <li>Fulfilling contracts</li> <li>Our legitimate interests</li> <li>Our legal duty.</li> </ul>	<ul style="list-style-type: none"> <li>Being efficient about how we fulfil our legal and contractual duties.</li> <li>Complying with regulations that apply to us.</li> </ul>
<ul style="list-style-type: none"> <li>To detect, investigate, report, and seek to prevent financial crime.</li> <li>To manage risk for us and our customers.</li> <li>To obey laws and regulations that apply to us.</li> <li>To respond to complaints and seek to resolve them.</li> </ul>	<ul style="list-style-type: none"> <li>Fulfilling contracts</li> <li>Our legitimate interests</li> <li>Our legal duty.</li> </ul>	<ul style="list-style-type: none"> <li>Developing and improving how we deal with financial crime, as well as doing our legal duties in this respect</li> <li>Complying with regulations that apply to us.</li> <li>Being efficient about how we fulfil our legal and contractual duties.</li> </ul>
<ul style="list-style-type: none"> <li>To run our business in an efficient and proper way.</li> <li>This includes managing our financial position, business capability, planning, communications, corporate governance, and audit.</li> </ul>	<ul style="list-style-type: none"> <li>Our legitimate interests.</li> <li>Our legal duty.</li> </ul>	<ul style="list-style-type: none"> <li>Complying with regulations that apply to us.</li> <li>Being efficient about how we fulfil our legal and contractual duties.</li> </ul>
<ul style="list-style-type: none"> <li>To exercise our rights set out in agreements or contracts.</li> </ul>	<ul style="list-style-type: none"> <li>Fulfilling contracts.</li> </ul>	

## Groups of Personal Information

We use many different kinds of personal information, and group them together like this.

Types of personal information	Description
Financial	Your financial position, status and history.
Identity and Contact	Who you are, where you live and how to contact you.
Socio-Demographic	This includes details about your work or profession, nationality, education and where you fit into general social or income groupings.
Transactional	Details about your mortgage payments, any additional payments, and the bank account(s) they are made from.
Contractual	Details about the products or services we provide to you.
Default Information	Details about any missed payments or defaults.
Communications	Details from letters, emails, and conversations between us.
Open Data and Public Records	Details about you that are in public records such as the Electoral Register; and information about you that is openly available on the internet.
Usage Data	Other data about how you use our products and services.
Documentary Data	Details about you that is stored in documents in different formats, or copies of them. This could include things like your passport, drivers licence, or birth certificate.
Special Category Data	The law and other regulations treat some types of personal information as special category: <ul style="list-style-type: none"><li>• Racial or ethnic origin</li><li>• Religious or philosophical beliefs</li><li>• Trade union membership</li><li>• Genetic and bio-metric data</li><li>• Gender and Health Data</li></ul>
Criminal Records	Details of criminal convictions and offences.
Consents	Any permissions, consents, or preferences that you give us. This includes things like how you want us to contact you, or whether you prefer large-print formats.
National Identifier	A number or code given to you by a government to identify who you are, such as a National Insurance number.
Security Details	Any information you give us to allow us to identify you when you contact us.

## Where we collect personal information from

We may collect personal information about you (or your business) from these sources:

### Data you give to us:

- When you apply for our products and services
- When you talk to us on the phone
- When you use our websites
- In emails and letters
- In customer surveys
- If you take part in our competitions or promotions.

### Data we collect when you use our services.

- Payment and transaction data.

### Recording phone calls

We may monitor or record phone calls with you in case we need to check we have carried out your instructions correctly, to resolve queries or issues, for regulatory purposes, to help improve our quality of service, and to help detect or prevent fraud or other crimes. Conversations may also be monitored for staff training purposes.

## Using information on social networking sites

As part of our ongoing commitment to understanding our customers better, we may research comments and opinions made public on social networking sites such as Twitter and Linked-in.

### Data from third parties we work with:

- Companies that introduce you to us
- Financial advisers
- Credit reference agencies
- Fraud prevention agencies
- Public information sources such as Companies House
- Agents working on our behalf
- Market researchers
- Solicitors
- Government and law enforcement agencies. (UK and Overseas)

### Who we share your personal information with

- Agents and advisers who we use to help run your accounts and services, collect what you owe, and explore new ways of doing business
- HM Revenue & Customs, regulators and other authorities (UK and Overseas)
- Credit reference agencies
- Fraud prevention agencies
- Companies we have a joint venture or agreement to co-operate with
- Organisations that introduce you to us
- Organisations that we introduce you to
- Reference requests (as required) from your employer, landlord or current mortgage provider;
- Independent Financial Advisors
- Organisations/Individuals you ask us to share your data with.

We may need to share your personal information with other organisations to provide you with the product or service you have chosen:

- If you use direct debits, we will share your data with the Direct Debit scheme.
- If you have a secured loan or mortgage with us, we may share information with other lenders who also hold a charge on the property.

We may also share your personal information for reasons related to any restructuring of our group of companies or the funding arrangements of Magellan Homeloans:

- We may choose to sell, transfer, or merge parts of our business, or our assets. Or we may seek to acquire other businesses or merge with them. If this results in your mortgage being transferred to another party, that party may use your data in the same way as set out in this notice.
- In order to optimise the funding arrangements for our mortgage portfolio, we may share details of your mortgage with other funding providers.

During any such process where we share your data with other parties, we'll only do this if they agree to keep your data safe and private.

## How we use your information to make decisions

We make a number of decisions based on the personal information we have, or are allowed to collect from others, about you.

### Pricing

We may decide what to charge for some products and services based on what we know

### Detecting fraud

Before we provide financing to you, we undertake checks for the purposes of preventing fraud and money laundering, and to verify your identity. These checks require us to process personal data about you. The personal data you have provided, we have collected from you, or we have received from third parties will be used to prevent fraud and money laundering, and to verify your identity.

If we think there is a risk of fraud, we may stop activity on the accounts or refuse access to them.

### Approving credit

We may use a rules based system to decide whether to lend money to you or your business, when you apply for a mortgage. We may use historic data to assess how you're likely to act while paying back any money you borrow.

### **We use data from three sources:**

- Your application form
- Credit reference agencies
- Data we may already hold.

We make an overall assessment based on this and to help make responsible lending decisions that are fair and informed.

### **Your rights**

Your personal data is protected by legal rights, which include your rights to:

- Object to our processing of your personal data;
- Request that your personal data is erased or corrected;
- Request access to your personal data.
- You can ask that we do not make our decision based on the automated score alone.
- You can object to an automated decision, and ask that a person reviews it.

For more information or to exercise your data protection rights, please contact us using the contact details above.

### **Credit Reference Agencies (CRAs)**

We carry out credit and identity checks when you apply for a product or services for you or your business. We may use Credit Reference Agencies to help us with this.

If you use our services, from time to time we may also search information that the CRAs have, to help us manage those accounts.

We will share your personal information with CRAs and they will give us information about you. The data we exchange can include:

- Name, address and date of birth
- Credit application
- Details of any shared credit
- Financial situation and history
- Public information, from sources such as the electoral register and Companies House.

We'll use this data to:

- Assess whether you or your business is able to afford to make repayments
- Make sure what you've told us is true and correct
- Help detect and prevent financial crime
- Manage accounts with us
- Trace and recover debts
- Make sure that we tell you about relevant offers.

We will go on sharing your personal information with CRAs for as long as you are a customer. This will include details about your settled accounts and any debts not fully repaid on time. It will also include details of funds going into the account, and the account balance as well as details of your repayments and whether you repay in full and on time. The CRAs may give this information to other organisations that want to check credit status. We will also tell the CRAs when you settle your accounts with us.

When we ask CRAs about you or your business, they will note it on your credit file. This is called a credit search. Other lenders may see this and we may see credit searches from other lenders.

If you apply for a product with someone else, we will link your records with theirs. We will do the same if you tell us you have a spouse, partner or civil partner – or that you are in business with other partners or directors.

You should tell them about this before you apply for a product or service. It is important that they know your records will be linked together, and that credit searches may be made on them.

CRAs will also link your records together. These links will stay on your files unless one of you asks the CRAs to break the link. You will normally need to give proof that you no longer have a financial link with each other.

You can find out more about the CRAs on their websites, in the Credit Reference Agency Information Notice. This includes details about:

- Who they are
- Their role as fraud prevention agencies
- The data they hold and how they use it
- How they share personal information
- How long they can keep data
- Your data protection rights.

Here are links to the information notice for each of the three main Credit Reference Agencies we use:

Call Credit: [www.callcredit.co.uk/crain](http://www.callcredit.co.uk/crain)

Equifax: [www.equifax.co.uk/crain](http://www.equifax.co.uk/crain)

Experian: [www.experian.co.uk/crain](http://www.experian.co.uk/crain)

## **Fraud Prevention Agencies (FPAs)**

We may need to confirm your identity before we provide products or services to you or your business. We use Fraud Prevention Agencies to help us with this. Once you have become a customer of ours, we will also share your personal information as needed to carry out checks to help detect fraud and money-laundering risks and to verify your identity.

These checks require us to process personal data about you. The personal data you have provided, we have collected from you, or we have received from third parties will be used to prevent fraud and money laundering, and to verify your identity.

When we and fraud prevention agencies process your personal data, we do so on the basis that we have a legitimate interest in preventing fraud and money laundering, and to verify identity, in order to protect our business and to comply with laws that apply to us. Such processing is also a contractual requirement of the services or financing you have requested. A legitimate interest is when we have a business or commercial reason to use your information. This must not unfairly go against what is right and best for you.

We or an FPA may allow law enforcement agencies to access your personal information. This is to support their duty to detect, investigate, and prevent crime.

Fraud prevention agencies can hold your personal data for different periods of time, and if you are considered to pose a fraud or money laundering risk, your data can be held for up to six years.

### **The information we use**

These are some of the kinds of personal information that we use:

- Name
- Date of birth
- Residential address
- History of where you have lived
- Contact details, such as email addresses and phone numbers
- Device identifiers including IP address and vehicle details.
- Financial information
- Information relating to you or your business's products or services
- Employment details

### **Fraud prevention**

The information we have for you or your business is made up of what you tell us and data we collect when you use our services, or from third parties we work with.

As part of the processing of your personal data, decisions may be made by automated means. This means we may automatically decide that you pose a fraud or money laundering risk if our processing reveals your behaviour to be consistent with money laundering or known fraudulent conduct, or is inconsistent with your previous submissions, or you appear to have deliberately hidden your true identity. You have rights in relation to automated decision making; if you want to know more please contact us using the details above.

If we, or a fraud prevention agency, determine that you pose a fraud or money laundering risk, we may refuse to provide the services or financing you have requested, or we may stop providing existing services to you.

A record of any fraud or money laundering risk will be retained by the fraud prevention agencies, and may result in others refusing to provide services, financing or employment to you.

If you have any questions about this, please contact using the details above.

### **How this can affect you**

If we or an FPA decide there is a risk of fraud or money laundering risk, we may refuse to provide the services or financing you have requested, or we may stop providing existing services to you or block access to them. FPAs will also keep a record of the risk that you or your business may pose.

A record of any fraud or money laundering risk will be retained by the fraud prevention agencies, and may result in others refusing to provide services, or finance to you. If you have any questions about this, please contact us using the details above.

## Data transfers outside the EEA

Whenever fraud prevention agencies transfer your personal data outside the European Economic Area, they impose contractual obligations on the recipients of that data to protect your personal data to the standard required in the European Economic Area. They may also require the recipient to subscribe to 'international frameworks' intended to enable secure data sharing.

## Sending data outside the EEA

We will only send your data outside of the European Economic Area ('EEA') to:

- Follow your instructions.
- Comply with a legal duty.
- Work with our agents, investors and advisers who we use to help run your accounts and services.

If we do transfer information to our agents or advisers outside of the EEA, we will make sure that it is protected in the same way as if it was being used in the EEA. We'll use one of these safeguards:

- Transfer it to a non-EEA country with privacy laws that give the same protection as the EEA. Learn more [on the European Commission Justice website](#).
- Put in place a contract with the recipient that means they must protect it to the same standards as the EEA. Read more about this here [on the European Commission Justice website](#).
- For data sent to the USA, transfer it only to organisations that are part of Privacy Shield. This is a framework that sets privacy standards for data sent between the US and EU countries. It makes sure those standards are similar to what is used within the EEA. You can find out more about data protection [on the European Commission Justice website](#).

## If you choose not to give personal information

We may need to collect personal information by law, or under the terms of a contract we have with you.

If you choose not to give us this personal information, it may delay or prevent us from meeting our obligations. It may also mean that we cannot perform services needed to run your accounts. It could mean that we cancel a product or service you have with us.

Any data collection that is optional would be made clear at the point of collection.

## How long we keep your personal information

We will keep your personal information for as long as you are a customer of Magellan Homeloans.

After you stop being a customer, we will keep your data for a further period 7 years for one of these reasons:

- To respond to any questions or complaints.
- To show that we treated you fairly.
- To maintain records according to rules that applies to us.

We may keep your data for longer than 7 years if we cannot delete it for legal or regulatory reasons. If we do, we will make sure that your privacy is protected and only use it for those purposes.

## How to get a copy of your personal information

You can access your personal information we hold by writing to us at this address:

The Compliance Department  
Magellan Homeloans  
Ashcombe House,  
5 The Crescent,  
Leatherhead,  
Surrey,  
KT22 8DY

## Letting us know if your personal information is incorrect

You have the right to question any information we have about you that you think is wrong or incomplete. Please contact us if you want to do this.

If you do, we will take reasonable steps to check its accuracy and correct it.

## What if you want us to stop using your personal information?

You have the right to object to our use of your personal information, or to ask us to delete, remove, or stop using your personal information if there is no need for us to keep it. This is known as the 'right to object' and 'right to erasure', or the 'right to be forgotten'.

There may be legal or other official reasons why we need to keep or use your data. But please tell us if you think that we should not be using it.

We may sometimes be able to restrict the use of your data. This means that it can only be used for certain things, such as legal claims or to exercise legal rights. In this situation, we would not use or share your information in other ways while it is restricted.

You can ask us to restrict the use of your personal information if:

- It is not accurate.
- It has been used unlawfully but you don't want us to delete it.
- It not relevant any more, but you want us to keep it for use in legal claims.
- You have already asked us to stop using your data but you are waiting for us to tell you if we are allowed to keep on using it.

If you want to object to how we use your data, or ask us to delete it or restrict how we use it or, please contact us.

## How to withdraw your consent

You can withdraw your consent at any time. Please contact us if you want to do so.

If you withdraw your consent, we may not be able to provide certain services to you. If this is so, we will tell you.

## How to complain

Please let us know if you are unhappy with how we have used your personal information. You can contact us by

### By Telephone

You can call us on 03303 355777

### By Email

Email us at [customerservices@magellanhomeloans.co.uk](mailto:customerservices@magellanhomeloans.co.uk)

### In Writing

You can write to us at:      Customer Relations Manager  
Magellan Homeloans  
Ashcombe House,  
5 The Crescent,  
Leatherhead,  
Surrey, KT22 8DY

You also have the right to complain to the Information Commissioner's Office which regulates the processing of personal data. Find out on their website how to [report a concern](#).

## Formats for sharing data

You have the right to get your personal information from us in a format that can be easily re-used. You can also ask us to pass on your personal information in this format to other organisations.

## Cookies

To find out more about how we use cookies please see our cookie notice.