

# Privacy Notice

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## Your Personal Data – what is it?

Personal Data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the Data Controller’s possession or likely to come into such possession. The processing of Personal Data is governed by the General Data Protection Regulation 2016/679 (the “GDPR”)<sup>1</sup>.

## Who are ‘we’?

Damon Pike is the Data Controller (“we”, “us”). This means they decide how your Personal Data is processed and for what purposes.

## How do we process your Personal Data?

We comply with our obligations under the GDPR by keeping Personal Data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting Personal Data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect Personal Data.

We use your Personal Data for the following purposes: -

1. To provide our advice and implementation service in respect of financial products, such as mortgages, life assurance, pensions and investments.
2. To keep in contact with our clients about products and services which we believe may be of value to them
3. To inform people of our business and its activities

## What is the legal basis for processing your Personal Data?

### Article 6 Processing

- Consent of the **Data Subject**; where we are marketing to the public. (needs to be an opt in method)
- Processing is necessary for the performance of a contract with the **Data Subject** or to take steps to enter into a contract; where we have been engaged to provide financial services.

### Article 9 Processing

- Explicit consent of the **Data Subject**; where we wish to tell people about events, news, services
- Processing is necessary for the establishment, exercise or defence of legal claims or where courts are acting in their judicial capacity;

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<sup>1</sup> Note for advisers: At the time of writing, the new Data Protection Bill is being considered by Parliament. Once passed, it will incorporate GDPR and may make some amendments. Once it has been passed, it will become the law governing the collection and processing of Personal Data. However, for now we refer to GDPR as the relevant law.

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## Sharing your Personal Data

Your Personal Data will be treated as strictly confidential, and will be shared only with Julian Harris Networks and providers of financial service products, third-party data storage providers and legal or regulatory authorities if obliged to do so.

We keep your Personal Data for no longer than reasonably necessary and we only retain your data for servicing the financial services provided where agreed and in case of any legal claims and for regulatory purposes.

## Your rights and your Personal Data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your Personal Data: -

- The right to request a copy of your Personal Data which we hold about you;
- The right to request that we correct any Personal Data if it is found to be inaccurate or out of date;
- The right to request your Personal Data is erased where it is no longer necessary for us to retain such data;
- The right to withdraw your consent to the processing at any time;
- The right to request that the Data Controller provide the Data Subject with his/her Personal Data and where possible, to transmit that data directly to another Data Controller;
- The right, where there is a dispute in relation to the accuracy or processing of your Personal Data, to request a restriction is placed on further processing;
- The right to object to the processing of Personal Data;
- The right to lodge a complaint with the Information Commissioners Office.

## Further processing

If we wish to use your Personal Data for a new purpose, not covered by this Data Protection Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

## Contact Details

Lupo Mortgage Services, 61 Columbia Crescent, Wolverhampton, WV10 6GB  
[info@lupoms.co.uk](mailto:info@lupoms.co.uk)  
07503 942280

You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.

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## Consent

By signing this form you are confirming that you have read this Data Protection Notice and that you are consenting to Lupo Mortgage Services holding and processing your Personal Data for the following purposes (please tick the boxes where you are happy to grant consent): -

Name: .....

Address.....

Telephone .....

Email address .....

- To keep you informed about news, events, activities and services;
- To contact you with surveys about current events;
- Send you offers of other products and services that we offer.

I consent to be contacted by: email  by text  by post  by phone

You can grant consent to all the purposes; one of the purposes or none of the purposes. Where you do not grant consent we will not be able to use your Personal Data for marketing purposes but may process the data in certain limited situations, such as where required to do so by law or to protect members of the public from serious harm.

If you do grant consent, please note you can withdraw your consent to all or any one of the above purposes at any time by contacting the Data Controller. Please note that all processing of your Personal Data will cease once you have withdrawn consent but this will not affect any Personal Data that has already been processed prior to this point.

Signed .....

Dated .....