

Pepper (UK) Limited: Privacy Notice version 3

1. Introduction

Pepper (UK) Limited (“**Pepper**”) is servicing your mortgage. This means that Pepper (UK) Limited has taken responsibility for the personal information in connection with your mortgage. We are under a legal duty to handle the information we hold about you transparently and responsibly, which includes providing you with the important information contained in this notice.

2. What information do we hold about you?

We only hold the information we need to administer your mortgage. This includes, but is not limited to:

- Information needed to prove your identity, such as a copy of a driving license or passport,
- Contact information such as your name, address, telephone number and email address,
- Personal circumstance information such as your employment details or financial circumstances,
- Records of your contact with Pepper staff, such as a copy of an email exchange or a recording of a phone call,
- Information about your health, for example where you are in financial difficulties because of a health issue or where you need special assistance to communicate with us,
- Credit reference information, obtained from Credit Reference Agencies,
- Information from third parties, for example a law enforcement body, where there is evidence of criminality.

3. What do we use your personal information for?

We use your personal information for various purposes, which are all related to servicing your mortgage. These include, but are not limited to:

- Managing your account, for example keeping records of the payments you make,
- Contacting you to provide information about the status of your mortgage,
- Dealing with any queries or complaints you may have,
- Undertaking reviews of your data against sanction and watchlists,
- Monitoring and maintaining internal business processes related to your mortgage.

We also use your personal information for regulatory and accounting purposes. These include but are not limited to:

- Carrying out terrorist financing checks, and
- Responding to official requests for information from law enforcement agencies, regulatory authorities or government agencies.

4. What is Pepper’s legal basis for collecting and using your personal information?

What is Pepper’s legal basis for collecting and using your personal information?

Under data protection law, we must have a legal basis for collecting and using your personal information. Pepper relies on several different legal bases including:

- Legitimate Interests: We collect and use your personal information where it is in Pepper’s legitimate interests to do so, provided, that this does not have a negative impact on your privacy rights. We believe that it is in our legitimate interests to analyse customer complaints to prevent errors and improve our services, for example.
- Consent and contract: Sometimes we will ask for your consent to collect and use your personal information, but usually we will rely on ‘legitimate interests’ or ‘contract’. However, we will normally ask for consent to collect information about your health. In some cases, we may hold information about your health without your consent, but only to protect vulnerable customers’ financial interests in cases where consent cannot be given.
- If we ask for your consent to collect and use your personal information, we will give you a clear choice and the opportunity to withhold your consent or to withdraw it if you want to.

5. Who do we share your personal information with?

When necessary, we may share your personal information with third parties. These include, but are not limited to:

- staff and functions within Pepper on a need to know basis – i.e. where they need access to information about you to service your mortgage,
- insurers, solicitors, accountants, valuers, estate agents, advisers, counter-fraud agencies and other third parties whose input is needed to service your mortgage,
- credit reference agencies – e.g. data about your mortgage repayment history,

- the original lender or the beneficial owner of your mortgage or other parties with an interest in your mortgage,
- IT, system suppliers and other third parties that provide business services to us,
- Regulators, law enforcement or other agencies, where we are allowed or required to do so,

Sometimes we may transfer personal information outside of the United Kingdom, but if we do so we will make sure the necessary contractual or other safeguards are in place.

6. How long do we keep your personal information for?

We have to keep your personal information for the duration of your mortgage, but we usually keep it for up to 7 years after the end of your relationship with us. In some cases, for example where there is a dispute or legal action, we may keep your personal information for longer than this, but only for as long as is necessary in the circumstances. We also comply with all legal and regulatory requirements to retain your personal information.

7. What rights do you have over your personal information?

You have several rights over the personal information we hold about you. These rights are not absolute, but Pepper will always provide you with the rights the law entitles you to. Your rights include:

- Access: You have a right to access the personal information we hold about you.
- Rectification: If our records about you are wrong, you have a right to have them corrected.
- Erasure: You have a right to ask us to delete your personal information.
- Restriction of processing: You have a right to stop the active use of your information, for example where there is a dispute over its accuracy.
- Object: In some cases, you have the right to object to the processing of your personal information, for example where you believe that Pepper's legitimate interests unfairly outweigh your individual interests, rights or freedoms.
- Portability: In some cases, you have a right to require Pepper to transfer your personal information to you or to another organisation of your choice in a commonly readable electronic format.

Use the contact details below to get in touch with us if you want to use any of your information rights. If you are not happy with the way we use your personal information, then you can make a complaint to the United Kingdom's data protection regulator at <https://ico.org.uk/make-a-complaint/>

8. Information about third parties

If you are acting on behalf of one of our customers, for example because they have asked you to do so or you have been granted power of attorney, we will ask for proof that you can act on that person's behalf. Once we are satisfied that you can, we will only use any information about you for the purposes you provide it for and will handle it in line with this privacy policy - specifically section 9 below.

9. What do we use your personal information for?

We use your personal information for various purposes, which are all related to servicing a mortgage. These may include, but are not limited to:

- Managing the account, for example keeping records of the payments you make,
- Dealing with any queries or complaints you may have,
- Monitoring and maintaining internal business processes related to the mortgage.

We also use your personal information for regulatory and accounting purposes. These include but are not limited to:

- Responding to official requests for information from law enforcement agencies, regulatory authorities or government agencies.

Please get in touch with us at any time if you have any questions about how Pepper uses your personal information, or your rights over it. Our Data Protection Officer can be contacted at: DPO@peppergroup.co.uk or alternatively at the address below;

Pepper (UK) Limited, Harman House, 1 George Street, Uxbridge, UB8 1QQ