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V2.1 July 2023

Our commitments to you are:

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|  |  |  |
| <p>We protect your personal information</p> <p>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.</p> | <p>We do not sell your personal information</p> <p>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.</p> | <p>We use your information to improve our products and services</p> <p>We use personal information to continually improve our services and create better investment products to offer you.</p> |

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

Stratton Thorpe Mortgage Solutions 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 "Stratton Thorpe", "we", "us" or "our" we are referring to Stratton Thorpe Mortgage Solutions Limited.



We provide you with *intermediary services* in relation to the *products*.

Stratton Thorpe is 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 adviser and/or their previous network or employer (if applicable):

- contact information
- identity information
- financial 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
- product details

From lenders and/or product providers:

- product details
- contact information
- identity information
- financial information
- employment status
- health information

From identification and verification checking agencies:

- identity information
- sanction check information

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 <i>intermediary services</i> | | |
| to assist in the administration of any <i>products</i> you have obtained through <i>us</i> | 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 | Performance of a contract | <i>Lenders/product providers</i> External supplier(s) of software services through which <i>we</i> review, source and apply for decisions in principle, quotations and/or <i>products</i> on your behalf |
| to apply for <i>products</i> on your behalf | | |
| to refer you to third party advisers to provide you with financial advice | Consent | Sesame General Insurance Services Limited |
| to manage complaints | Compliance with a legal obligation | Sesame Limited <i>Our</i> external solicitors <i>Our</i> professional indemnity insurers and insurance adviser |
| to manage legal claims | Legitimate interests [– <i>we</i> have a legitimate interest in protecting <i>ourselves</i> from breaches of legal obligations owed to <i>us</i> and to defend <i>ourselves</i> from litigation. This is needed to ensure that <i>our</i> legal rights and interests are managed appropriately] | Sesame Limited <i>Our</i> external solicitors <i>Our</i> professional indemnity insurers and insurance adviser |
| to share with Sesame Limited as the company responsible for making sure that all sales <i>we</i> make to you and advice <i>we</i> 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 <i>us</i> | Legitimate interests [– <i>we</i> have a legitimate interest in operating <i>our</i> business. This includes ensuring that the service <i>we</i> provide is of a satisfactory standard] | Sesame Limited External supplier(s) of software services to obtain feedback from you |



| | | |
|---|--|---|
| <p>to retain records of any services or advice provided to you in accordance with <i>our</i> regulatory obligations</p> | <p>Compliance with a legal obligation</p> | <p>External supplier(s) of data storage and data hosting services to retain records on <i>our</i> behalf</p> |
| <p>to retain records of any services or advice provided to you by your <i>adviser</i> in order to defend potential legal claims or complaints</p> | <p>Legitimate interests [– we have a legitimate interest in defending <i>ourselves</i> from legal claims and complaints. This is needed to ensure that <i>our</i> legal rights and interests are managed appropriately]</p> | <p>External supplier(s) of data storage and data hosting services to retain records on <i>our</i> behalf</p> |
| <p>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</p> | <p>Consent Legitimate interests</p> | <p>n/a</p> |
| <p>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</p> | <p>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]</p> | <p>The Financial Conduct Authority Lenders/product providers Sesame Limited National Crime Agency (NCA) Police HMRC</p> |
| <p>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</p> | <p>Compliance with a legal obligation</p> | <p>Sesame Limited External supplier(s) to conduct anti-money laundering, identification and verification checks on our behalf Lenders/product providers</p> |



another lawful basis for processing it)

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 have appropriate security measures in place to prevent personal data from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal data to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.



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.

| 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 |
| <ul style="list-style-type: none"> Marketing lists | [detail how long a customer is kept on any marketing list for, or a general description about how your retention period is determined] |
| <ul style="list-style-type: none"> 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 |
| <ul style="list-style-type: none"> 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 |
| <ul style="list-style-type: none"> 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 then have a legitimate business reason to do this 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: 01295 256289

By email: enquiries@strattonthorpe.co.uk

By Post: 21 Avocet Way, Banbury, Oxfordshire, OX16 9YA

Transfer of your information out of the EEA

We may transfer your personal data to the following which are located outside the European Economic Area (EEA) as follows:

- Suppliers and sub-contractors which provide services to us. If we do transfer your personal data to our suppliers and sub-contractors outside of the EEA, we will make sure that it is protected in a similar way as if it was being used in the EEA. We'll use one of these safeguards:
 - the transfer will be to a non-EEA country with privacy laws that give the same protection as the EEA
 - the transfer will be subject to a *European Commission approved contract* designed to help safeguard your privacy rights and give you remedies in the unlikely event of a misuse of your personal data
 - the transfer will be 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 and it makes sure those standards are similar to the standards used within the EEA)
 - the transfer will be subject to binding corporate rules (agreements governing transfers made between organisations within in a corporate group)
-

You have a right to ask us for more information about any transfer of your personal data outside of the EEA, including the safeguards in place. To learn more, please see 'Your rights' below.



Your rights

You have legal rights under data protection regulation in relation to your personal data. These are set out under the below headings:

- To access personal data
- To correct / erase personal data
- To restrict how we use personal data
- To object to how we use personal data
- To ask us to transfer personal data to another organisation
- To object to automated decisions
- To find out more about how we use personal data

We may ask you for proof of identity when making a request to exercise any of these rights. We do this to ensure we only disclose information where we know we are dealing with the right individual.

We will not ask for a fee, unless we think your request is unfounded, repetitive or excessive. Where a fee is necessary, we will inform you before proceeding with your request.

We aim to respond to all valid requests within one month. It may however take us longer if the request is particularly complicated or you have made several requests. We will always let you know if we think a response will take longer than one month. To speed up our response, we may ask you to provide more detail about what you want to receive or are concerned about.

We may not always be able to fully address your request, for example if it would impact the duty of confidentiality we owe to others, or if we are otherwise legally entitled to deal with the request in a different way.

[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 our Data Privacy Manager at enquiries@strattonthorpe.co.uk or 21 Avocet Way, Banbury, Oxfordshire, OX16 9YA;

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.

Our supervisory authority

If you are not happy with the way we are handling your information, you have a right to lodge a complaint with the Information Commissioners Office (www.ico.org.uk).

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

UK:

