

# Privacy Policy

## Introduction

Your privacy is really important, which is why protecting your personal data is our top priority. This Privacy Policy explains what personal data Trussle collects, what we use it for and who we share it with. It also sets out how we look after your personal data, your privacy rights, and how the law protects you.

## 1. Important information and who we are

**It's important to know who's handling your data. Here we set out who we are, why we have this policy in place, and how you can get in touch with us if you have any questions or would like to talk to us about your data.**

Personal data we hold about you may be processed by Trussle, and where necessary shared with third parties, such as mortgage lenders and protection providers, for the purpose of processing your application, assessing the risk to grant you products, and for regulatory purposes.

### Purpose of this Privacy Policy

This Privacy Policy lets you know how we collect and process your personal data through your use of this website, including when you create an account, sign up to our newsletter, use our brokerage or mortgage monitoring services or take part in promotion or product feedback.

This website is not intended for children and we do not knowingly collect data relating to children, unless explicitly requested by a lender or protection provider in a very limited number of cases.

### Get in touch

Trussle Lab Ltd is the controller and responsible for your personal data and this website (we use "Trussle", "we", "us" or "our" in this Privacy Policy ). We are registered with the ICO under number ZA124882. You can get in touch with us if you have any questions about this Privacy Policy , including any requests to exercise your legal rights, at:

Trussle Lab Ltd, 1-3 Dufferin Street, London, EC1Y 8NA

Email address: [dataprotection@trussle.com](mailto:dataprotection@trussle.com)

Telephone number: 020 3884 1660

We are Trussle Lab Ltd, a company registered in England and Wales under company number 09459339. We are authorised and regulated by the Financial Conduct Authority (FCA), under firm reference number 924229. You can check this on the Financial Services Register by visiting the FCA website. You can find more details about how we're regulated in our **Terms of Business**.

### Keeping information up-to-date

This document was last updated in May 2021, and historic versions can be obtained by contacting us. It's important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## 2. What information we collect

**We're transparent about the sorts of information we're collecting and how it enables us to provide you with the best possible service, while protecting your interests as a customer.**

Personal data is any information which can (or could be used to) identify you. It doesn't include data which is not possible to relate to a specific person (anonymous data).

As a mortgage and protection broker, we want to tailor the right recommendations for your personal circumstances. We therefore ask you for a variety of information to be able to provide a personalised service. Your responses to the questions you provide have a direct impact on what further details we may need from you, as different lenders require different information. This helps us ensure we can select from the widest range of products to provide you with the most appropriate recommendation. We'll always explain this to you, and you can ask us any questions about the data we're collecting at any time.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

**Identity Data** includes first name, maiden name, last name, marital status, title, date of birth, gender, address and employment history, and citizenship.

**Contact Data** includes address, email address and telephone numbers.

**Financial Data** includes bank account details and bank statements, your income and outgoings, credit history including details of any history of bankruptcy or county court judgements, mortgages and protection products held, and payment/ direct debit details.

**Special Category/Sensitive Data** which includes physical and mental health conditions, racial / ethnic origin, criminal offences and convictions. Special category data is collected, where relevant, for the purposes of preventing fraud, arranging a mortgage and/or protection policy for you.

**Transaction Data** includes details about the products and services you may have benefitted from by using Trussle.

**Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

**Profile Data** includes your username and password.

**Usage Data** includes information about how you use our website, products and services.

**Marketing and Communications Data** includes your preferences in receiving marketing from us, and our business partners and your communication preferences.

As part of our fact find, we may require information about criminal convictions and offences that you may have, for example for fraud detection. We also collect specific Special Categories of Personal Data about you to provide you with advice for your protection needs (i.e. details about your ethnicity and information about your health).

We collect data relating to the number of dependents as this affects our affordability calculations to provide you with the most appropriate recommendation. However, we'll only ask for further data relating to dependents if specifically requested as part of an application to be submitted to a lender. We'll only request

this data if absolutely necessary. This data will be treated sensitively and we won't use this data for marketing purposes or creating personality or user profiles.

Apart from the information customers provide to us directly, we may also record information about potential vulnerabilities where we think this is appropriate to meet the obligations placed on us by the Financial Conduct Authority (FCA) with regard to vulnerable customers. You can find out more about our obligations to potentially vulnerable customers here. For more information, visit our accessibility page [here](#).

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.

## Updating your details

If you are an existing customer we may use the information we have on you to pre-fill forms when you apply for a new product, but we'll always check that these details are accurate and up to date.

## 3. How is your personal data collected and what is it used for?

**You'll communicate with us throughout your Trussle journey, so it's important to understand what happens to your personal information along the way.**

We use different methods to collect data from and about you including through:

**Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, SMS, phone, email or otherwise. This includes personal data you provide when you:

- sign up for our services;
- speak to an adviser;
- create an account on our website;
- subscribe to our newsletter;
- request marketing to be sent to you;
- give us some feedback.

**Information received from a joint applicant.** If you are included on an application, but are not the main applicant Trussle receive information about you which has been provided in the application. You will receive a notification from us when the main applicant submits the online form and at key milestones in your application.

**Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our cookie policy for further details.

**Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:

- Technical Data from: *analytics providers and website experience recording services such as Google and FullStory based inside and outside the EU*; advertising networks or providers based inside the EU; and search information providers based in the EU.
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.
- Identity and Contact Data from Hooyu (as part of the anti-money laundering checks we're required to undertake).
- Estate agents with whom you may be interacting, but only with your consent;
- New home builders, as a legitimate interest of the builder in order to assess affordability for the property;
- Enquiries you may perform on third-party mortgage sourcing websites.
- Your financial information from your bank available via Open Banking with your consent

## How we use your personal data

We'll only use your personal data when the law allows us to. Most commonly, we'll use your personal data in the following circumstances:

- Where we need to perform the contract we're about to enter into or have entered into with you.
- Where it's necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- Where you have provided your consent

To find out more about the types of lawful basis that we'll rely on to process your personal data please email [dataprotection@trussle.com](mailto:dataprotection@trussle.com). Where we rely on consent as a legal basis for processing your personal data, you have the right to withdraw consent at any time by contacting us at [dataprotection@trussle.com](mailto:dataprotection@trussle.com).

## What we use your personal data for

We've set out below a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we're using your data. Please Contact us if you need details about the specific legal ground we're relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To initially engage with you to discuss your requirements	(a) Identity (b) Contact	Performance of a contract with you

To source products, provide indicative quotes, and process & deliver your application for a mortgage and / or protection product	(a) Identity (b) Contact (c) Financial (d) Transaction (f) Special Category/ Sensitive Data	Performance of a contract with you  Necessary to comply with a legal obligation  Necessary for our legitimate interests (to recover debts due to us)
To monitor your mortgage, let you know when a better deal becomes available, and let you know if relevant products are available through Trussle.	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	Performance of a contract with you  Consent
<p>To manage our relationship with you, which will include:</p> <p>(a) Create and maintain access to your customer portal account</p> <p>(b) Notifying you about changes to our terms or Privacy Policy</p> <p>(c) Asking you to leave a review or take a survey</p> <p>(d) Notifying you when your product is near expiry or when changes occur that would merit our re-engagement.</p>	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	<p>Performance of a contract with you (including to re-engage with you to review your existing mortgage / protection needs, and to maintain and improve customer service standards)</p> <p>Necessary to comply with a legal obligation</p> <p>Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</p> <p>Consent</p>
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)

To respond to case enquiries & support any complaints	(a) Identity (b) Contact (c) Profile (d) Usage (f) Special Category/ Sensitive Data	Necessary to comply with a legal obligation and for our legitimate interests (to ensure that complaints can be responded to accurately)  Regulatory requirements such as; the FCA Mortgage Conduct of Business (MCOB), Systems and Controls (SYSC), Dispute Resolution (DISP), Supervision requirements (SUP), EU AML Directives, UK GDPR
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)  Consent
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to understand how our customers use our platform)  Consent (for cookies which provide insight into how visitors use our website, so we can keep our content relevant and inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to meet your customer needs and inform you about key areas of the mortgage process)  Consent

To request feedback or to ask you to participate in user testing or surveys to improve our website, products/services, marketing, customer relationships and experiences	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)
To take set up payment for financial product providers	(a) Identity (b) Financial	Performance of a contract with you

## Indirect

To protect against money laundering, we're required to conduct customer identity screening. As part of this process, we'll try to verify your name and address by checking your details against databases held by credit reference agencies and the electoral roll. If we can't verify your name and address, we may ask you to provide us with other documents to confirm these details. This does not affect your credit history or status.

If you're a joint mortgage applicant we'll record any information you give us about any other persons who are joined to the application.

## Credit Searches

When you apply for a mortgage with Trussle we undertake a soft credit search that will not leave a footprint on your credit file. We may update this search if your application is not made to a lender within 30 days, however it will still not leave a footprint.

In the event that we submit your application to your lender they will likely check the following records: Credit Reference Agencies (CRAs); Fraud Prevention Agencies (FPAs) and Its own records. When CRAs receive a search request from the lender, commonly known as a hard search, they will place a search footprint on your credit file that may be seen by other lenders. Having multiple search footprints on your credit file may affect your ability to borrow in the future.

## Marketing and feedback

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

In addition, we value all feedback our customers provide to help us build our business and improve our product. If you leave us a review, we may contact you to ask you if you would like to publicise your review, or to offer you follow up assistance with any difficulties encountered. We may also follow up for feedback or to ask if you are willing to contribute to marketing material.

## Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You'll receive marketing communications from us if you've requested information from us or used our services, or if you provided us with your details when you created an account and, in each case, you've opted to receive that marketing. We may also send you information about products we think you would be interested in based on services you have purchased via Trussle. Our emails always include a link which lets you unsubscribe if you'd rather not receive marketing.

## **Marketing communications**

You will have the choice to opt-in in the sign up process, to receive marketing information and related products and services. You can opt-out of receiving these types of communications at any time by contacting our team at [data.protection@trussle.com](mailto:data.protection@trussle.com) or by clicking on the relevant link in email communications you receive from us.

Please note that your personal information will not be passed to any third-party organisation for marketing purposes.

## **Third-party marketing**

We'll always ask your permission before we share your personal data with any company outside Trussle for the third party's marketing purposes. If you later change your mind, you'll need to contact them directly to ask to be unsubscribed (but their emails should also contain an unsubscribe link)

## **Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, have a look at our [Cookie Policy](#).

## **Pixels**

When we send you an email it may contain a small snippet of code called a tracking pixel which allows us to collect certain information about your interaction with the email.

Through this tracking we may record your IP address, the date & time that you opened the email and any links you may click. We use this to understand what emails or services were of interest to you and if the campaigns are effective. We also do this to better tailor our messages to you and optimise your Trussle experience.

By setting your email client to display HTML emails as text only, you may be able to prevent the use of some email tracking. Please consult the "Help" section of your email client for more information

## **Change of purpose**

We will only use your personal data for the purposes stated above, unless we reasonably consider that we need to use it for another reason and it is compatible with the original purpose. Please contact us for an explanation as to how any new processing is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and explain the legal basis which allows us to do so. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

# **4. Disclosures of your personal data**

**We'll always treat your data and privacy with respect. This applies where we need to share this to provide you with the best possible service. More details are set out below.**

## Who we disclose personal data to

Type of recipient	Reason
<b>Mortgage Advice Bureau</b>	Depending on your requirements and the date of your initial enquiry at Trussle, it may be necessary to share your personal data with the Mortgage Advice Bureau to review details of your application as part of the due diligence process
<b>Lenders and protection product suppliers</b>	<p>To source and submit applications in order to conclude the contract for the mortgage / protection application and the ongoing servicing of these contracts.</p> <p>It's important to note that mortgage lenders, protection providers and other third parties are also data controllers in their own right, and have their own privacy notices. You may be required to agree to their privacy notices upon application, if applicable.</p>
<b>External suppliers</b>	<p>Specialist IT system providers to facilitate the sourcing of products, to provide our web services, support technical issues, to provide continuing advice, introduce specialist mortgage or protection products, to inform you about relevant products and services, complete due diligence and oversight, and to request feedback and reviews on customer service standards.</p> <p>It may also be necessary to share your personal data with non-affiliated companies who perform support services on our behalf including those that provide professional, compliance, legal or accounting advice to Trussle.</p> <p>Lead suppliers (if you were introduced to us by a third party, including "refer a friend". Social media platforms we use for marketing purposes.</p>
<b>Solicitors / Conveyancers</b>	To update the firm of solicitors / conveyancers with whom you are interacting about the progress of your application and confirm your identity / proof of deposit.
<b>Estate agents / new home builders</b>	To update the firm of mortgage / protection advisers, estate agents and home builders with whom you are interacting about the results of affordability checks and progress of your application.
<b>Licensed Credit Agencies</b>	For the purposes of confirming your identity to; comply with Anti Money Laundering requirements; to complete a soft credit search to assess your eligibility (Experian through Castlight), as part of an application request for a Lenders Decision In Principle; and to perform a credit assessment with your consent as part of a full application.

<b>Regulators</b>	In order to fulfil our legal obligations as a regulated profession, for example with the Financial Conduct Authority, to verify your identity and comply with Anti Money Laundering legislation, and otherwise cooperate with law enforcement, legal proceedings or regulatory authorities.
<b>Others</b>	Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We don't allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

We will communicate primarily with the main applicant on joint applications. However we can communicate with either of the applicants regarding the application where necessary. By using our service you agree to Trussle disclosing application data to all applicants without restriction or prejudice. If you do not wish to be included on an application or you believe information about you has been incorrectly entered, please contact us by emailing [help@trussle.com](mailto:help@trussle.com), or your adviser.

## International transfers

We abide by the UK data protection laws. And, if we ever have to send data outside the UK , we take care that it's covered by the same high standards.

Some of the businesses we work with are based outside the UK so we need to transfer your personal data to them. Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We'll only transfer your personal data to countries that have been deemed to provide an adequate level of protection
- Where we use certain service providers, we may use specific contracts which give personal data the same protection it has in the UK and Europe.
- Where we use third parties based anywhere else in the world, we use specific contracts and conduct a due diligence check to ensure that the country provides adequate protection to personal data ,

Please [contact us](#) if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

## 5. Data security

### More information on how we work hard to keep your data secure.

We understand how important it is to keep your personal data secure, and have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition. We limit access to your data to those employees, agents,

contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we're legally required to do so.

## 6. Data retention

**We won't hold your data for any longer than we need to to make sure you're getting maximum benefit from our services. Find out more here:**

### How long will you use my personal data for?

We'll only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. As well as making sure you're always on the most suitable deal for your circumstances, this enables us to adhere to our regulatory requirements, ensure we gave suitable advice, and to answer any questions you may have later down the line. If you don't transact with us, depending on the stage of your application, we may delete your information sooner in accordance with our data retention policy.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Purpose of processing	Retention
Successful mortgage / protection applications	For the full mortgage or protection policy term plus a further 6 years, or for a period of 30 years for historical cases if the original term is not recorded
Withdrawn, stalled, incomplete and failed mortgage / protection applications	3 years from the date the latest application was started, or 6 years from the application submitted date if application was submitted and subsequently rejected or from creation date if advice has been provided but not pursued
Client Portal accounts	3 years from date of last login if not proceeded to full application
Affordability checks	3 years from Decision In Principle if affordability check does not proceed to a full mortgage application
Enquiry data obtained from third parties (Estate Agents, websites) that do not result in an application	3 years from the date the lead was received from the Introducer

In some circumstances you can ask us to delete your data: see Request erasure below for further information. In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## 7. Your legal rights

**You have the right to be informed about the collection and use of your personal data, and to have a say in how it's handled. It's important to be aware of these rights and when you can exercise them, so we've set them out here.**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. We'll be happy to discuss these and how they might apply to you. If you wish to exercise any of the rights set out below, please Contact us.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we'll notify you and keep you updated.

You won't have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

In summary, you have the right to:

**Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we're lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we're required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we're relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we're processing your personal data for direct marketing purposes. In some cases, we may demonstrate

that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you don't want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We'll provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we're relying on consent to process your personal data. However, this won't affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We'll advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please Contact us.

#### **What if I am still not satisfied?**

If you have any questions or complaints relating to how we use your personal data, or if you wish to exercise any of your rights regarding your personal data, please contact the Information Security & Data Protection Manager by emailing [dataprotection@trussle.com](mailto:dataprotection@trussle.com) or by writing to us. We will respond to you as soon as possible. The length of time will depend on the type and complexity of the request, but you will receive a response no later than one month from the initial request.

If you are not satisfied with how Trussle has responded to your enquiry, you have the right to complain to the [Information Commissioner's Office](#) (ICO), who is the regulator for data protection in the United Kingdom.