**(CAPSTONE FINANCE) PRIVACY NOTICE**

Capstone Finance, are committed to protecting your privacy. This policy statement, together with any document referred to within, sets out the basis on which we will use the personal information you supply to us directly yourself or supplied to us by a third party. Capstone Finance is responsible for the processing of the personal information you supply and is registered with the Information Commissioners Office under the UK Data Protection act 1998, registration number ZB289904.

**Website**

We have structured our website so that you can visit without identifying yourself or revealing any personal information.

If you review or download information from the website, this information is tracked to enable us to provide you with tailored information and to give us information about your use of our website. This action will not personally identify you.

Should you wish to complete a contact or enquiry form on the website or through our connected portals, we collect and store the personal information supplied to us via secure servers to enable us to fulfil your request.

Any personal information you chose to disclose via the website or portals will be processed in accordance with this privacy notice.

**What information do we collect?**

To arrange a mortgage, loan or other plan or service for you, we will need to collect a wide range of personal data and financial related information. Our UK based team will only collect information that is pertinent to the service we provide and will hold this information only for as long as necessary.

We will also collect credit or debit card details to make payments for Capstone Finance services and to pass to relevant parties such as lenders and surveyors. This information will not be retained after payment has been made.

We will retain and process your personal information based on our ‘Terms of Business’ contract with you, our statutory and legal obligations, our regulatory requirements and our legitimate business interests.

**How is the information collected?**

We collect information via a variety of means which include website forms, telephone calls, email, text messages, social media, post, fax and face to face meetings. We may also monitor and record our telephone conversations with you.

The information may be collected directly by Capstone Finance and its staff or from third parties to whom you have agreed may pass your personal information to Capstone Finance.

**How is the information used?**

Capstone Finance, will use personal data received to process your request for a mortgage, loan or other plan or service on your behalf. You may advise us at any time should you no longer wish us to use your data. We will use the information in several ways to improve how we support our customers, which includes but is not limited to:

* Letting you know about changes to our products and services.
* Confirmation of your identity.
* Training of our staff and fraud Investigation and prevention.
* Confirmation of the documents and information you provide to us.
* Keeping our records up to date and complying with regulatory and legal obligations.
* Administration and review of the mortgages, finance and products we have arranged for you.
* Helping us to assess your needs for protection plans in connection with your borrowing.
* Conducting surveys to help us improve our service.

**Who will your information be shared with?**

To arrange a mortgage, loan or other plan or service we will need to share your personal data with relevant third parties. These third parties include mortgage lenders, product providers, surveyors, solicitors and other parties that relate to your applications.

When we proceed with a mortgage, loan or other plan or service for you and your data is shared with a lender or provider, we recommend you also read their Privacy Notice in conjunction with ours. This can be found on the lenders or providers website or our central page here: <https://connectbrokers.co.uk/lenderprivacy/>

As an Appointed Representative of Connect IFA Ltd, information about yourself will be shared with Connect IFA Ltd who are our Network. Connect IFA Ltd assist us with the processing your application as well as for compliance oversight purposes.

If your request for services has come from an introducer of business to Capstone Finance, we may share limited information with the introducer for the purposes of keeping them informed as to how your application is progressing.

We use third party software systems including cloud-based storage, to help us to manage mortgage, loan and product applications and to process and verify the personal information you supply to us. All software suppliers store any data in the UK and are subject to UK regulations including the UK Data Protection Regulations and are obliged to keep your details securely and use them only to fulfil the contracted service.

**Marketing**

We will seek your explicit consent to provide you with general market news and updates and to inform you of any products and services offered by Capstone Finance and its associated companies that are not connected with your specific mortgage, loan or other plan or service. If you use a service offered by Capstone Finance, you will not automatically be opted in to marketing without your consent. We will not provide your personal data to any unconnected third party in connection with marketing.

We will obtain explicit consent from you either verbally, via our website, via meetings face to face including shows and events, by email, or by completion of a consent form and will keep a record of your consent.

Marketing may include emails, telephone calls, social media and postal marketing. You can advise us of your preferences on how you would like us to provide marketing and the marketing content that is of most interest to you. You may update your preferences at anytime and you may also withdraw your consent at anytime.

**Changes to our Privacy Policy**

It may be necessary to update this privacy policy from time to time to meet legal, regulatory and commercial requirements. Please visit this page from time to time and take note of any changes. Any personal data collected prior to any change will not be affected by the change without your permission.

On the 25th May 2018, The Data Protection Act 1998 was superseded by The Data Protection Act 2018 supplemented by GDPR. This Privacy Notice sets out most of your rights under the new act but may be updated further if regulation changes in the future.

**Changes of ownership**

Capstone Finance, may from time to time sell or transfer the control of the company. Any personal data supplied by you where relevant to the part of the business being sold or transferred will be transferred to the new owner or controlling party and will continue to be used under the terms of this policy for the purposes that the personal data was originally supplied to us.

**Access**

You have a right to access any personal information we hold about you. To request access or for any questions about this privacy policy please contact: Capstone Finance, Kemp House, 152 – 160 City Road London, EC1V 2NX, Tel: 01375 390 293, Email: info@capstonefinance.co.uk