Privacy Policy

Podium Solutions Limited

V1.3

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1. Introduction

1.1.1. This Privacy Policy explains how we use your Data including:

1.1.1.1. Where we collect your Data from
1.1.1.2. What Data we collect
1.1.1.3. How we use your Data
1.1.1.4. Who your Data is shared with
1.1.1.5. The rights and choices you have when it comes to your Data

1.1.2. The main reason we process your Data is to provide you with the services that you request from us. For certain purposes, we may share your Data with our Partners and regulatory or governmental bodies. We will only hold your Data for as long as necessary to fulfil the purposes for which we hold that Data. To make enquiries or exercise any of your rights as set out in this Privacy Policy please contact us.

2. How do we collect Data?

2.1. From you

2.1.1. Most of the Data we collect will be direct from you when you use our Websites or Services. We will collect this Data from you through web pages, mobile applications or other similar devices, channels or applications operated by or on behalf of any of Podium Solutions Limited. The Data that we share will be used to speed up form filling, or to provide relevant results and to personalise or improve your experience when using our Websites and Services.

2.2. From our Partners

2.2.1. We will sometimes use third party companies to collect and/or process your Data on our behalf, for example we may use Partners (such as IT service providers or market research agencies). Where we use third parties, we will make sure that they commit to keep your Data safe.

2.3. From providers

2.3.1. If you purchase a Product from a third party whose Products are shown on our Websites, or returned by our Services, then they may send us Data they hold relating to the Product(s) you have purchased. This allows us to track sales and improve our Websites and Services.

2.3.2. We may also obtain Data that you have shared with our Partners, but only where you have given them your consent to do so.

2.4. From credit reference agencies

2.4.1. If you use our Eligibility Service, our service provider QLFY Limited will carry out a quotation or “soft” search of your credit file held by Equifax Limited and return Data from that search to us, so that we can show you how likely you are to be accepted for mortgage Products. A soft search does not affect your credit score and is not visible to lenders.

3. What Data do we collect?

3.1.1. The Data we may collect when you use our Websites or Services includes your name, address, email address, telephone number, date of birth, details about your home together with details of your financial Data, for example, income and expenditure. We use this Data to obtain comparative quotes for mortgage Products and to provide our affordability and eligibility indications. If you use our Eligibility Service, this may also include Data from your Equifax credit file, as described in “From credit reference agencies” above.

3.1.2. In the course of providing the services to you, we may also store information about how you use our Websites or Services, for example, the pages viewed, the web page from which you came to visit our Website(s), changes you make to the Data you supply to us, details of the quotes you request and your transactions.

3.1.3. The only Data we will knowingly collect for children under the age of 16 is their age, so we know the age of your dependants. If you are aged under 16 please get your parent or guardian's permission before you provide any Data to us.

3.1.4. If you are providing us with another person's Data you should first ask them to read this Privacy Policy. By giving us Data about another person you are confirming that they are happy for you to provide the Data to us and that they understand how their details will be used.

3.1.5. We may monitor or record your calls, emails, SMS or other communications but we will do so in accordance with data protection legislation and other applicable law. Monitoring or recording will always be for business purposes, such as for quality control and training, to prevent unauthorised use of our Websites and Services, to ensure effective systems operation, to meet any legal obligation and/or to prevent or detect crime. In order to ensure the Website and Services we provide you continue to meet your needs we may ask you for feedback on your experience of using our Websites or Services. Any feedback you provide will only be used as part of our programme of continuous improvement and will not be published on our Websites. Note that it is your responsibility to check and ensure that Data you provide to Podium is correct, complete, accurate and not misleading and that you disclose all relevant facts.

4. How do we use your Data?

4.1.1. We may use your Data to:

4.2. Enable you to access and use our Websites and Services

4.2.1. Including:

4.2.1.1. Verifying your identity, managing, running and administering your account or use of any mobile applications if you choose to set up a Website account or download mobile applications
4.2.1.2. Passing it to our Partners including companies whose Products or services are included on our Websites or as part of our Services, with a view to them providing you with an online quote for the Product/Service requested by you. When our Partners use your Data to provide a quote they will act as data controllers of your Data
4.2.1.3. To make it easier for you to use the Websites we may store the Data you provide and may use it to pre-populate fields on the Websites when making return visit
4.2.1.4. To process a transaction between you and a third party
4.2.1.5. To track sales, which may involve us sharing Data with your Product provider relating to the Product(s) you have purchased

4.3. To assist our Partners in communicating with you

4.3.1. For example:

4.3.1.1. Sending you a confirmation email of your quote - you may be sent confirmation of your quote by email or SMS so that you have a record of it and can easily retrieve your quote in the future
4.3.1.2. Sending you useful reminders, such as when the initial term of your mortgage deal is nearly over

4.4. To personalise and improve aspects of our Websites and Services

4.4.1. Including:

4.4.1.1. To improve our recommendations and insights. The Data we collect helps us tailor our content and improve our suggestions to you and other users about Products or services that may interest you or them
4.4.1.2. To match our Data with Information from other sources - we may validate and analyse your Data and, in some cases, match it against Information that has been collected by a third party to ensure that the Data we hold about you is accurate, consistent and well-organised and in order to continually personalise our Websites and Services and make them as easy to use as possible. For example, we may pass your IP address to certain of our Partners to facilitate the correct look-up of your street address. We may also match Data you provide us with against that collected by a third party to help gather all the Data that is required in order for the Website or Service you have requested to complete successfully (particularly if some of this Data may be difficult for you to locate) and to pre-populate some of the Data required by the Website or Service for you by providing estimated figures

4.5. For research, such as analysing market trends and customer demographics

4.5.1. Including:

4.5.1.1. We may use the Data relating to your quotes, your Data and Information about the policies and contracts you have taken out to carry out various research and analysis activities to help us review and improve the Websites or our Services

5. Who do we share your Data with?

5.1.1. When you use any of our Website or Services, we may disclose your Data to the following Partners:

5.2. Mortgage lenders

5.2.1. In order to display quotes or decisions we may send your Data to Partner lenders. We might need to send them your Data so that they can return us Information to display on our Websites or return via our Services. When these companies use your details in this way, they will be acting as data controllers of your Data which means that they are in charge of how they handle your Data and we are not responsible for this.

5.2.2. Our current mortgage lender Partners are:

5.2.2.1. Nationwide Building Society: https://www.nationwide.co.uk/about/corporate-information/cookies-and-privacy/how-we-use-your-information
5.2.2.2. Santander: https://www.santander.co.uk/personal/mortgages/data-protection
5.2.2.3. NatWest: https://personal.natwest.com/personal/privacy-policy/privacy-policy-pcw.html

5.3. Mortgage brokers

5.3.1. In order to help you progress your application we may also pass your Data to mortgage brokers. When these companies use your details in this way, they will be acting as data controllers of your Data which means that they are in charge of how they handle your Data and we are not responsible for this.

5.3.2. Our current mortgage Partners are:

5.3.2.1. London and Country: https://www.landc.co.uk/about-us/privacy-statement/; https://www.landc.co.uk/about-us/terms-of-business-advised/
5.3.2.2. Fluent Mortgages: https://www.fluentmortgages.co.uk/data-protection/
5.3.2.3. Mortgage Advice Bureau: https://www.mortgageadvicebureau.com/privacy-policy/

5.4. Service providers

5.4.1. Service providers that we engage to help us provide certain services and/or functionality, such as whether Products are suitable for you.

5.4.2. Our current service provider Partners are:

5.4.2.1. QLFY Limited (company number 14585496), which we use to deliver our Eligibility Service. QLFY Limited carries out a quotation or “soft” search of your Equifax credit file and returns the results to us. QLFY Limited acts as a data processor on our behalf, which means it only processes your Data in accordance with our instructions: https://www.qlfy.co.uk/privacy-policy

5.4.3. When a soft search is carried out for our Eligibility Service, Equifax Limited will process your Data as a credit reference agency. A soft search leaves a record on your credit file that only you can see; it does not affect your credit score and is not visible to lenders. To find out how Equifax uses your Data, see the Credit Reference Agency Information Notice (CRAIN): https://www.equifax.co.uk/crain

5.5. Other third parties

5.5.1. If you click through to any of our third party web pages, provide them with additional Data on their web pages and/or if you decide to purchase a Product from any third parties then they will be data controllers of your Data and you should read their own privacy policy which you should find on their web pages.

5.5.2. Other third parties that we engage to help us provide certain services and/or functionality.

5.6. Regulators

5.6.1. Where permitted or required by law or regulation, we may also disclose Data or other information about you (including electronic identifiers such as IP addresses) and/or access your account in order to comply with legal or regulatory requirements for example:

5.6.2. If required to do so by any court, the Financial Conduct Authority, the Competition and Markets Authority or any other applicable regulatory, compliance, Governmental or law enforcement agency
5.6.3. If necessary in connection with legal proceedings or potential legal proceedings
5.6.4. In connection with the sale or potential sale of all or part of our business
5.6.5. If we reasonably believe false or inaccurate Data has been provided and fraud is suspected, details may be passed to fraud prevention agencies to prevent fraud and money laundering

6. Who might our Partners share your Data?

6.1.1. In order to provide you with a quote, our Partners may exchange Data about you with other companies and/or carry out checks with various databases. Our Partners act as data controllers in respect of this use of Data and we are not responsible for it. We have set out below some of the common ways they will share your Data:

6.1.1.1. Some of our Partners may use your Data to assess your circumstances (including Data about any joint applicant that is provided) and verify the Data that you have provided
6.1.1.2. Some Partners may carry out checks with fraud prevention and credit reference agencies
6.1.1.3. Some Partners may carry out checks against Information they already hold on you, (or is held by the company whose brand they administer the Product for, or members of their group of companies) such as information from existing products, account data, data from previous product transactions, accounts you may hold with them or loyalty scheme data

6.1.2. This Data exchange allows our Partners to verify the Data that is provided during the quote process (including Data about any joint applicants).

6.1.3. If you decide to enter into a contract with one of our Partners through any of our Websites or Services, the Data you have provided to us, together with any further Data requested by, and supplied by you or us to the Partner, will be held by the Partner for the purposes set out in their privacy policy and they will act as data controller of your Data. Therefore, you are strongly advised to read your chosen provider's privacy policy and satisfy yourself as to the purposes for which the provider will use your Data before entering into the contract. We have no responsibility for the uses to which a provider puts your Data.

7. Legal grounds for processing your Data

7.1.1. We will only collect and use your Data in accordance with data protection laws. Our legal grounds for processing your Data in the ways described in this Privacy Policy are as follows:

7.2. Performance of a contract

7.2.1. In order to provide you with services and manage your account we will:

7.2.1.1. Search our Partners to get you the best quotes and/or access Information required to provide you with the relevant service from our third party Partners (as described in our Terms of Use), including arranging a soft search of your Equifax credit file through QLFY Limited when you use our Eligibility Service
7.2.1.2. Process any transaction between you and a third party

7.2.1.3. Manage, run, and administer your account. When we do this we are processing your Data because it is necessary to perform the contract that we have in place with you to provide you with our Services

7.3. Consent

7.3.1. Where we have asked for your consent, we will only collect and process your Data if you have given your consent for us to do so.

7.4. Legitimate interests

7.4.1. We may use and process some of your Data where we have sensible and legitimate business grounds for doing so. Under UK privacy laws there is a concept of "legitimate interests" as a justification for processing your Data. Our legitimate interests for processing your Data are:

7.4.1.1. To personalise and improve our Websites and Services. We constantly aim to improve our services to you and using your Data in this way helps us to do this
7.4.1.2. To assist our Partners in communicating with you in relation to the Services used. Our Partners may need to keep you informed about your use of the services, for example sending you a confirmation email of your quotes or sending you reminders based on the Data you have provided to us via our Website or Services, such as when your initial deal period is nearly over
7.4.1.3. For market research and analysis. This helps us to regularly review and improve the Products and Services we or our Partners provide. Where possible Data that we use/provide in this way will be in an anonymised format

7.4.2. You have the right to object to our use of your Data for these legitimate interests. If you raise an objection, we will stop processing your Data unless very exceptional circumstances apply, in which case we will let you know why we are continuing to process your Data. Please contact us at contact@podium-solutions.co.uk if you wish to exercise this right.

8. How secure are our Websites and Services?

8.1.1. Your Data security is very important to us. This is why we use HTTPS on our Websites and Services to help keep Data about you secure. However, no data transmission over the internet can be guaranteed to be totally secure. Where appropriate, certain Data, will be further encrypted to minimise the risk of interception during transit. All of your Data is encrypted at rest and stored within the United Kingdom or the European Economic Area (EEA).

9. How can you amend your preferences?

9.1.1. We will not send you any marketing messages. You may, however, receive such messages from our Partners. If you no longer wish to be contacted by providers for marketing purposes, please follow the instructions in their marketing communications, or consult their privacy policies for further information about unsubscribing.

10. Your Data rights and how to contact us

10.1.1. You have certain rights under data protection legislation in relation to the Data that we hold on you.

10.1.2. To make enquiries or exercise any of your rights set out in this Privacy Policy please contact us.

10.1.3. This Privacy Policy shall be governed and construed in all respects in accordance with the laws of England and Wales.

10.2. Right to access

10.2.1. The right to a copy of the Data we hold about you. We'll ask you to describe the Data you require, as well as letting us know about any other email addresses you've used on our Websites or supplied to our Services, to enable us to trace your Data. Depending on the nature of your request, we may also ask you for your full name, your date of birth and your full address and documents to allow us to verify your identity. Requests for copies of your Data will be dealt with within one month, unless your request is complicated or if you have made a large number of requests. In these circumstances it may take us longer to deal with your request, in which case we will let you know if we need longer than one month to respond.

10.3. Right to correct

10.3.1. The right to have your Data rectified if it is inaccurate or incomplete. Requests for us to correct your Data will be dealt with within one month, unless your request is complicated or if you have made a large number of requests. In these circumstances it may take us longer to dealt with your request, in which case we will let you know if we need longer than one month to respond. If we believe that your Data is accurate, we will let you know that that we will not be amending your Data and why.

10.4. Right to erasure and to restrict our use of your Data

10.4.1. The right to request that we delete or remove your Data from our systems. Data protection laws give exceptions to this right which, if applicable, we will explain in our response to you.

10.5. Right to restrict our use of your Data

10.5.1. In some circumstances you can 'block' us from using your Data or limit the way in which we can use it.

10.6. Right to Data portability

10.6.1. The right to request that we move, copy, or transfer your Data.

10.7. Right to object

10.7.1. The right to object to our use of your Data including where we use it for our legitimate interests or where we use your Data to carry out profiling to inform our market research and customer demographics. If you raise an objection, we will stop processing your Data unless very exceptional circumstances apply, in which case we will let you know why we're continuing to process your Data.

11. How long do we keep your Data?

11.1.1. We will only hold your Data on our systems for the period necessary to fulfil the purposes outlined in this Privacy Policy or until you request it is deleted (unless a longer retention period is required or permitted by law).

11.1.2. Generally, you can expect us to keep your Data while you use the Websites/Services or if you have an active account with us. Where you have applied for or purchased Products or Services directly or via our Websites we will need to keep your Data for longer for accounting purposes - up to six (6) years following the date on which it is provided to us.

11.1.3. Where you use our Websites or Services, but do not have an active account with us, and you do not apply for any Products we will hold your Data for no longer than one (1) year.

11.1.4. If one of our Partners processes your Data in order to provide you with a quote they will be acting as data controller but they should only hold that Data for so long as is reasonable in relation to providing you with that quote.

11.1.5. If you purchase a Product then the provider will keep your Data in accordance with their own retention periods and so you should check their own privacy policy for further information.

11.1.6. Even if you delete or ask us to delete your Data it may persist on backup or archival media for legal, tax or regulatory purposes.