

Welcome to the equityreleaseadvice.co.uk Website privacy notice.

This privacy notice will inform you as to how we look after and use the personal data you may provide to us when you visit our website (regardless of where you visit it from) or otherwise have contact with us and tell you about your privacy rights and how the law protects you.

equityreleaseadvice.co.uk is operated by Lead Technologies (Europe) Limited (trading as Lead Tech). In using equityreleaseadvice.co.uk and submitting limited data to us we will share this data with a relevant advisor so that they can contact you and provide you with the services you have enquired about via equityreleaseadvice.co.uk. Once we have made this introduction and shared your data with an advisor we are not responsible for the advisor's privacy statements. When you start to provide further data to the advisor we encourage you to request and read the advisor's privacy notice(s). Please be aware that advisors may use tools to make automated decisions (i.e. using policy comparison tools).

equityreleaseadvice.co.uk or our other communications with you may include links to third party sites.

Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below.

Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

- 1. Important information and who we are**
- 2. The data we collect about you**
- 3. How is your personal data collected?**
- 4. How we use your personal data**
- 5. Disclosures of your personal data**
- 6. International Transfers**
- 7. Data Security**
- 8. Data Retention**
- 9. Your legal rights**
- 10. Glossary**

1. Important information and who we are

Purpose of this privacy notice

This privacy notice aims to give you information on how Lead Tech, as the operator of equityreleaseadvice.co.uk, and controller, collects and processes your personal data you have entered into any online forms, through your use of this website, including any data you may provide through this website when you sign up to a newsletter, call us / we call you (all calls are recorded for compliance (i.e. FCA), quality, dispute resolution and training purposes and also so we may liaise with advisors about any issue you have raised with us) or which is exchanged in other electronic communications. This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements other notices and privacy policies and is not intended to override them.

Contact details

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise [your legal rights], please contact the data privacy manager in the following ways:

Full name of legal entity of controller: Lead Technologies (Europe) Limited

Email address: data.team@lead-tech.co.uk

Postal address: Pool Business Park, Pool Rd, Pool in Wharfedale, Otley LS21 1FD

FCA Number: 947409

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy notice and your duty to inform us of changes
We keep our privacy notice under regular review. This version was last updated on 23rd August 2021.

It is 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. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

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

- Lead Data includes all or some of the following as required to enable an advisor to contact you in relation to your enquiry: first name, last name, marital status, title, date of birth, gender, postcode and pension pot size.
- Health Data Where the type of policy / advice you are seeking requires some information about your health (e.g. your smoker status) this is health data and so a Special Category of Personal Data. Our processing of this health data is required to be able to give you the best service and, if required according to your enquiry, we will not be able to take your enquiry further without this information.
- Technical Data includes internet protocol (IP) address, 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 interests, preferences, feedback and survey responses.
- 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 third parties and your communication preferences.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will 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 notice.

Save for health data we have no need to collect any other types of Special Category Data.

2. The data we collect about you

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. How is your personal data collected?

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

- **Direct interactions.** You may give us your Lead Data, [Health Data] and Marketing and Communications Data by filling in forms on the website or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - apply for our products or services;
 - subscribe to our service or publications;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey; or
 - give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our **cookie policy** for further details.
- **Third parties.** We will receive personal data about you from various third parties as set out below:
 - Technical Data from the following parties:
 - analytics providers; Google Analytics, VWO, Hotjar
 - advertising networks such as Google Ads and Facebook Ads based [inside OR outside] the UK; and
 - Lead Data [and Health Data] from data brokers or aggregators [such as [NAME] based [inside OR outside] the UK].

4. How we use your personal data

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

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is 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 obligation.

Click here to find out more about the types of lawful basis that we will rely on to process your personal data.

Purposes for which we will use your personal data

We have set out below, in a table format, 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 are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

4. How we use your personal data

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To enable us to contact you to ensure we have all relevant details to advance your enquiry and to enable an advisor to contact you as requested for advice	(a) Lead Data (b) Health Data	Performance of a contract with you Consent
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy notice (b) Asking you to leave a review or take a survey (c) to comply with FCA regulations: Call recording: The FCA considers that recordings are useful to ensure that customers are treated fairly, consistently and are given the correct information.	(a) Lead Data (b) Profile Data (c) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Lead Data (b) Profile Data (c) Usage Data (d) Marketing and Communications Data	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Lead Data (b) Technical Data	(a) 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) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Lead Data (b) Profile Data (c) Usage Data (d) Marketing and Communications Data (e) Technical Data	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)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	a) Technical Data (b) Usage Data	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Lead Data (b) Technical Data (c) Usage Data (d) Profile Data (e) Marketing and Communications Data	Necessary for our legitimate interests (to develop our products/services and grow our business)

4. How we use your personal data

Marketing

In using equityreleaseadvice.co.uk you are aware that we provide your data to an advisor / third party relevant to your enquiry.

We may also use your Lead, Technical, Usage and Profile Data to form a view on other services / products relevant to your enquiry (which may be provided by third parties) and send you an e-newsletter or marketing emails. As such you will receive marketing communications from us if you have requested information from us or purchased goods or services from us and you have not opted out of receiving that marketing.

We will not **share** your data with any third parties for their marketing purposes without your express consent however, where you click a link to a third party site or contact them direct this as a result of the information in an e-newsletter or email this is outside the scope of this privacy notice and you should check the privacy notice of the third party before providing data to the third party.

Opting out

You can ask us to stop sending you the e-newsletter or marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving marketing messages, we will mark this request in our databases but it will not act to delete personal data provided to us as a result of a product/service, product/service experience which we shall retain for 5 years in accordance with FCA requirements.

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, please see **Cookie Policy**.

4. How we use your personal data

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will 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.

5. Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes set out in the table [Purposes for which we will use your personal data] above.

- Internal Third Parties as set out in the [Glossary].
- External Third Parties as set out in the [Glossary].
- Specific third parties such as the advisor or an alternate advisor as relevant to your enquiry who we are contracted with and who is obliged to provide you with their own privacy notice as soon as possible after making contact with you.
- 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 do not 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.

6. International transfers

Many of our external third parties are based outside the UK so their processing of your personal data will involve a transfer of data outside the UK.

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring that specific contracts specific contracts approved for use in the UK which give personal data the same protection it has in the UK and safeguards are in place:

7. Data security

We 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 personal 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 are legally required to do so.

8. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

The over-riding retention period applicable to the data we collect in order to connect you to an advisor is 5 years (as per FCA requirements). In some circumstances you can ask us to delete your data: see [your legal rights] below for further information.

In some circumstances we will 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.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

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

No fee usually required

You will not 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 could 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.

Time limit to respond

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

10. Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

THIRD PARTIES

Internal Third Parties – Whilst none at present, this may apply where Lead Tech grows and become part of a group of companies.

External Third Parties

Service providers acting as processors who provide IT and system administration services. The main processors which process data outside of the EU are:

- Salesforce may process data on its servers in the US. In the event of this occurring our contract with them includes a data processing addendum, which in turn, includes binding corporate rules.
- Hubspot may process data on its servers in the US. In the event of this occurring our contract with them includes standard contract clauses.
- Our professional advisers including lawyers, bankers, auditors and insurers who provide [consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities who require reporting of processing activities in certain circumstances.

10. Glossary

YOUR LEGAL RIGHTS

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 are 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 are 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 are 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 are 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:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- 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.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

10. Glossary

Request the transfer of your personal data to you or to a third party. We will 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 are relying on consent to process your personal data. However, this will not 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 will advise you if this is the case at the time you withdraw your consent.

Cookie Policy

Cookie Policy

Most websites you visit will use cookies in order to improve your user experience by enabling that website to 'remember' you, either for the duration of your visit (using a 'session cookie') or for repeat visits (using a 'persistent cookie').

Some websites will also use cookies to enable them to target their advertising or marketing messages based for example, on your location and/or browsing habits. Cookies may be set by the website you are visiting ('first party cookies') or they may be set by other websites who run content on the page you are viewing ('third party cookies').

What is in a cookie?

A cookie is a simple text file that is stored on your computer or mobile device by a website's server and only that server will be able to retrieve or read the contents of that cookie. Each cookie is unique to your web browser. It will contain some anonymous information such as a unique identifier and the site name and some digits and numbers. It allows a website to remember things like your preferences or what's in your shopping basket.

Accepting or declining cookies

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

The types of cookies we use:

First party cookies

First party cookies are set by the website, you are visiting and they can only be read by that site.

Third party cookies

Third party cookies are set by a different organisation to the owner of the website you are visiting. For example, the website might use a third party analytics company who will set their own cookie to perform this service. The website you are visiting may also contain content embedded from, for example YouTube or Flickr, and these sites may set their own cookies.

More significantly, a website might use a third party advertising network to deliver targeted advertising on their website. These may also have the capability to track your browsing across different sites. It is important to note that advertising cookies are not set for UK visitors to the equityreleaseadvice.co.uk website.

equityreleaseadvice.co.uk does use advertising cookies but these will not track your behaviour outside of the equityreleaseadvice.co.uk website and other sites in our network.

Cookie Policy

Session cookies

Session Cookies are stored only temporarily during a browsing session and are deleted from the user's device when the browser is closed.

Persistent cookies

This type of cookie is saved on your computer for a fixed period (usually a year or longer) and is not deleted when the browser is closed. Persistent cookies are used where we need to know who you are for more than one browsing session. For example, we use this type of cookie to store your preferences, so that they are remembered for the next visit.