



Privacy Statement

1. Overview

Millrose Financial is committed to protecting your privacy. Millrose Financial, provide the services and content available on www.millrosefinancial.co.uk (together or individually referred to as "the site") and are committed to protecting and respecting your privacy.

This policy (together with the terms of use and any other documents referred to in it) sets out the basis on which any personal data Millrose Financial collects from Users, or that Users provide to Millrose Financial, will be processed. Please read the following carefully to understand Millrose Financial's views and practices regarding your personal data and how it will be treated.

Millrose Financial is responsible for the processing of the personal information you provide us and is registered with the ICO (Information Commissioners Office) in the UK under the General Data Protection Regulation. Our registration number is ZA759737.

2. Information Collected about our Customers

In order to provide the highest level of service we will ask for certain personal information, this may be online or otherwise. When accessing our website, we may also collect information about the devices you are using or ask a third party to do so on our behalf. This information will relate to your personal and financial circumstances. It may also include special categories of personal data such as data about your health, if this is necessary for the provision of our services.

We only collect information that is pertinent to the service we provide and will retain this information for only as long as is needed.

Information will be retained for legitimate business activities, statutory or legal obligations or for auditing and regulatory purposes. We may also collect information when you voluntarily complete client surveys or provide feedback to us.

Where required in line with the services we provide, we may pass your details on to third parties such as those that we engage for professional compliance, accountancy or legal services as well as product and platform providers that we use to arrange financial products for you. We do this on the understanding that they treat your information as confidential and only use it for the purpose for which it has been supplied. Where third parties are involved in processing your data we'll have a contract in place with them to ensure that the nature and purpose of the processing is clear, that they are subject to a duty of confidence in processing your data and that they'll only act in accordance with our written instructions.

Where it's necessary for your personal data to be forwarded to a third party we'll use appropriate security measures to protect your personal data in transit.

Your personal information will be held securely on our system throughout our relationship with you, using a variety of systems and controls to protect your data from being used or disclosed in any way it shouldn't. This information will include data provided by you or others and may be provided in many ways including but not limited to:

- Information provided in applications, emails and letter, telephone calls and conversations held face to face. Also, information may be acquired from completing forms on our website, customer surveys, questionnaires, competitions and promotions and through use of our company website or during financial reviews.
- Details of User's visits to the site including, but not limited to, the referrer page, the pages of the site accessed, traffic data, location data, web logs and other communication data, along with the time of these events.
- Information received from third parties such as credit reference agencies, mortgage lenders and insurance companies, social networking and comparison sites or fraud prevention agencies.

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Millrose Financial is a trading style of Millrose Consulting Limited. Millrose Consulting Limited is an Appointed Representative of Ingard Financial Ltd which is authorised and regulated by the Financial Conduct Authority No 450731.

Think carefully before securing other debts against your home. Your home may be repossessed if you do not keep up repayments on your mortgage.

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When making an enquiry with us we will ask you to provide some initial contact details. These may include your name, previous name, address history, date of birth, contact telephone number and email address.

If you advise us of a change to your personal information we will update the records on our database. It is however, your responsibility to provide any other party where you may have opened an account or policy.

If you apply for a product through Millrose Financial, we may ask you for your bank details. Where a payment is required for costs such as valuations, we may ask for credit or debit card details. We commit to destroying this information as soon as any payment has been made. We do not retain details of debit or credit cards. Where possible we will arrange for any payments to be made direct to providers.

When providing information about a third party such as in a joint application you should ensure you have their permission. We will store their information as described in this privacy notice.

The primary legal basis that we intend to use for the processing of your data is for the performance of our contract with you. The information that we collect about you is essential for us to be able to carry out the services that you require from us effectively. Without collecting your personal data we'd also be unable to fulfil our legal and regulatory obligations.

Where special category data is required, we'll obtain your explicit consent in order to collect and process this information.

Information about connected individuals

We may need to gather personal information about your close family members and dependants in order to provide our service to you effectively. In such cases it will be your responsibility to ensure that you have the consent of the people concerned to pass their information on to us. We'll provide a copy of this privacy notice for them or, where appropriate, ask you to pass the privacy information to them.

How long do we keep hold of your information?

During the course of our relationship with you we'll retain personal data which is necessary to provide services to you. We'll take all reasonable steps to keep your personal data up to date throughout our relationship.

We're also subject to regulatory requirements to retain your data for specified minimum periods. These are, generally:

- **Three years for mortgage business**
- **Three years for insurance business**

These are **minimum** periods, during which we have a legal obligation to retain your records.

We reserve the right to retain data for longer where we believe it's in our legitimate interests to do so. In any case, in most instances we will not keep your personal data for longer than 6 years after our relationship with you has ended. We do however reserve the right to retain your information for up to 15 years after our relationship has ended. You have the right to request deletion of your personal data. We'll comply with this request, subject to the restrictions of our regulatory obligations and legitimate interests as noted above.

3. Use of Our Website

Any data gathered via our website www.millrosefinancial.co.uk is owned solely by Millrose Financial and will only be utilised for the purposes described in this policy. All data is stored on servers in the UK.

When visiting our website or using our online service, certain data is collected automatically. This includes but is not limited to:

- How you connect to the internet, including your IP address.
- How you use our site such as screen resolution and browser data stored on your device, such as cookies. A cookie is a text-only string of data that is entered into the cookie file or 'memory' of the browser on your computer. It will typically contain the name of the domain from which the cookie has come, the 'lifetime' of the cookie, and a value, usually a randomly generated unique number. Cookies help Millrose Financial to

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improve the site and to deliver a better and more personalised service.

- Information about the device software and internet browser used.
- Location data such as the area of the IP address used when accessing our online services.

This information enables us to estimate audience size and usage patterns, recognise you when you return to the site and remember aspects of site subscription information and facilitate site enabled communication services. For further information visit <http://www.allaboutcookies.org/>

You can set your browser not to accept cookies and the above website tells you how to remove cookies from your browser. However in a few cases some of our website features may not function as a result.

In order to maintain and improve our level of customer service we may monitor or record our phone calls with you. This is not only used for training purposes but also helps detect and prevent fraud.

4. Using Personal Information

Personal data received by Millrose Financial may be used in a number of ways in order to continually improve the service we offer. This may include but is not limited to:

- Enabling the use of our website to accept you as a new or returning customer
- Processing of an application for a financial product on your behalf
- Letting you know of changes to our products and services
- Confirming your identity and the information you provide
- Improving how we support our customers
- Staff Training
- Maintaining our records
- Improved communications
- Fraud investigation and prevention
- Complying with our regulatory and legal obligations

When gathering personal information, we will always request your consent. We will also seek consent for marketing, market research and prize draw, competitions etc.

If we ever look to use your personal information for any purpose not described in this policy, we will seek to obtain your consent first.

5. Disclosure of Your Personal Information

Millrose Financial may disclose your information to our affiliates, associates or closely linked persons (howsoever defined by law or regulation), their directors, officers, employees and agents as well as any government entity or third party, for the purpose(s) outlined above or as a matter of law.

Millrose Financial may disclose your personal information to third parties:

- In the event that Millrose Financial sell or buy any business or assets, in which case Millrose Financial may disclose your personal data to the prospective seller or buyer of such business or assets;
- If Millrose Financial or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets; and/or
- If Millrose Financial are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply the terms of use and other agreements; or to protect the rights, property, or safety of Millrose Financial, its customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection, financial crime and credit risk reduction. We may send your details to third party agencies for identity verification purposes.

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6. Rights Regarding Your Personal Data

You have the right to ask Millrose Financial not to process your personal data for marketing purposes. Millrose Financial will usually inform you if it intends to use your data for such purposes or if it intends to disclose your information to any third party for such purposes. You can exercise your right to prevent the use of your data for marketing purposes by contacting Millrose Financial at Info@millrosefinancial.co.uk or in writing at Millrose Financial, 71-75 Shelton Street, London, WC2H 9JQ.

The website may, from time to time, contain links to and from the websites of Millrose Financial's partner networks, advertisers and affiliates. If you follow a link to any of these websites, you should note that these websites have their own privacy policies and that Millrose Financial does not accept any responsibility or liability for these policies. You should check these policies before submitting any personal data to these websites.

What can you do if you are unhappy with how your personal data is processed?

You also have a right to lodge a complaint with the supervisory authority for data protection. In the UK this is: Information Commissioner's Office

Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

7. Persons Under the Age of 16

Millrose Financial does not deliberately or intentionally collect personal identification information online or otherwise, from any child under the age of 16 as our services are not directed at children. Any person under the age of 16 should seek approval from a parent/guardian prior to providing any information.

8. Access to Your Personal Information

You have the right to request a copy of the personal information about you free of charge and to have any inaccuracies corrected. Please address requests to:
Millrose Financial, 71-75 Shelton Street, London, WC2H 9JQ or email Info@millrosefinancial.co.uk.

When your personal data is processed by automated means you have the right to ask us to move your personal data to another organisation for their use.

9. Changes to This Privacy Policy

Due to the rapidly evolving technologies and capabilities on the internet Millrose Financial may need to change this privacy policy over time.

Millrose Financial may revise these terms of use at any time for security, legal, best practice or regulatory reasons by amending this page.

We keep our privacy policy under regular review and we will place any updates on this web page (and/or) inform you of any changes when they occur.

This Privacy Policy was last updated on 1st April 2023.



10. Contacting Millrose Financial

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to: Millrose Financial, 71-75 Shelton Street, London, WC2H 9JQ or email to Info@millrosefinancial.co.uk or by telephone on 0800 915 3243.