



Privacy Notice & Fair Processing Notice

This document explains how Gable Mortgages (**we, us**) record and use your personal information, your rights concerning your personal data and provides other important information for you to be aware of.

About Us

Gable Mortgages is a trading name of Gemini Consultants Limited (Company Registration 02088382), regulated by the Financial Conduct Authority (**FCA**) under registration number 311479.

Gemini Consultants Limited is registered as a data controller with the Information Commissioners Office (**ICO**), under registration number Z7439036.

If you need to contact us regarding any data protection or personal information questions, please use the following details:

Data Protection Officer

Address: AW House, 6-8 Stuart Street, Luton, LU1 2SJ

Email Address: DPO@gable.group

Information we collect

We collect personal information about you throughout your relationship with us. Initially, this information will be provided to us by your mortgage advisor in relation to your application for a Mortgage Loan, or directly with you in connection to a live Mortgage account. During the mortgage application journey, we may be required to process information relating to a joint applicant of the loan or another related third party (e.g. gift or of deposit funds).

Personal information may include but is not limited to, your:

- (a) **Identity:** name, date of birth
- (b) **Contact:** address, email address, telephone numbers, address history covering at least 3 years;
- (c) **Family information:** marital status and some details of your dependents;
- (d) **Nationality status:** residency, citizenship, nationality;
- (e) **Financial:** income and expenditure, savings, borrowings, debts, transactional history, information from credit reference agencies (**CRA**) and fraud prevention agencies (**FPA**);
- (f) **Employment:** employment record; and
- (g) **Occupier status:** e.g. whether you are currently a tenant or owner-occupier.



We may also collect special category data about you only if it is necessary and relevant to the provision of our products and services (where we need to carry out our legal obligations, such as detecting fraud and financial crime, where it is needed in the public interest, such as making our products and services more accessible for those who require additional support or for our customers economic well-being, or in limited circumstances with your explicit written consent (which you can withdraw at any time)). This special category data may include:

(h) Special category data

- health information (including information on your personal circumstances such as if you have reduced capacity (reduced sight or hearing for example), have care requirements, or circumstances that impact your mental or physical health); and
- biometric data.

Special category data, such as your health details, will only be used if it is relevant in supporting you in the provision of our products and services in accordance with the purposes we will use your information for as set out in the 'How we use your information' section below and will not be used for any decision making when granting or declining a loan with us.

- (i) **Criminal convictions and offences data:** We will also collect and process criminal convictions and offence data where permitted by law and in accordance with the relevant purposes as set out in the 'How we use your information' section below, such as detecting fraud and financial crime.

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.

How we collect information

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

- **Your interactions with us.** You may provide us with your personal data by completing our application forms with your mortgage advisor or when corresponding with our representatives by phone, email or otherwise.
- **Third parties or publicly available sources.** This may include:
 - CRAs;
 - HM Land Registry;
 - HM Revenue and Customs;
 - FPAs;



- Industry and trade bodies;
- Electoral roll;
- Other banks;
- Other financial service providers; and
- Other group companies (where necessary for us to lawfully carry out our business activities and purposes for processing).

How we use your information

We process your personal information for the following reasons:

Purpose/Use	Type of data	Legal basis
To provide you with our mortgage lending services	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to manage customer accounts and provide a high standard of service)
To verify your identity and creditworthiness	(a) Identity (b) Contact (d) Nationality status (e) Financial	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to ensure products are suited to your needs, to make fair, informed decisions)
To assess your affordability and suitability for our mortgage products	a) Identity (b) Contact (c) Family Information (d) Nationality status (e) Financial (f) Employment (g) Occupier status	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to ensure products are suited to your needs, to make fair, informed decisions)
Prevention of financial crime	(a) Identity (b) Contact (d) Nationality status (e) Financial (f) Employment (h) Special category data (i) Criminal convictions and offences data	(a) Performance of a contract with you (b) Legal obligation (c) Necessary for our legitimate interests (to detect, prevent and investigate financial crime, including fraud and money laundering) (d) substantial public interest – preventing fraud and detecting unlawful acts (for special category data and criminal convictions and offences)

Purpose/Use	Type of data	Legal basis
To communicate with you, and relevant third parties, regarding your mortgage application and ongoing mortgage account, or a mortgage application you are supporting, and to ensure we are providing adequate support to you in the management of your mortgage account.	(a) Identity (b) Contact (h) Special category data	(a) Performance of a contract with you (b) Legal obligation (c) Necessary for our legitimate interests (to manage customer accounts and provide a high standard of service) (d) Consent (will be asked for in order to provide additional support as required. Explicit consent will be used for special category data)
Where we have telephone calls with you, we may record these for the following purposes; (a) Training and monitoring; and (b) To review and improve our services.	(a) Identity (b) Contact (h) Special category data	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to manage customer accounts and provide a high standard of service) (c) Consent (will be asked for in order to provide additional support as required. Explicit consent will be used for special category data)
To meet our obligations under the law, regulations, and guidelines issued by the Information Commissioner's Office (ICO), General Data Protection Regulation (UK GDPR), Financial Conduct Authority (FCA) and Prudential Regulation Authority (PRA)	(a) Identity (b) Contact (e) Financial (f) Employment	(b) Legal obligation

Sharing your information

We may share your personal information with third parties such as:

- CRAs;
- HM Land Registry;
- HM Revenue and Customs;
- FPAs;
- Our professional advisers such as lawyers and accountants;
- Our third party service providers such as operational outsourcers, IT and system providers, cloud hosting companies, payment service providers, security partners, legal and accounting



firms, insurance companies, financial auditors, property valuation firms and advertising and market research companies.; and

- Regulatory bodies and law enforcement agencies (LEA).

As part of your application, we may check your credit history with **CRAs**, and this search will be recorded whether or not your application is approved. Each search will be noted on your credit file separately, and if there are many searches in a short period, it may affect your ability to get credit in the future. We (and other lenders) may consider these searches when you apply for credit or financial services now or in the future.

The information held by the **CRAs** about you may also be linked to the records of other people. When assessing your application, the **CRA** searches of joint applicants for a mortgage will be considered.

If you wish to exercise your data protection rights as a consumer with **CRAs**, please see the reference to **CRAIN**, where you can find further information on these **CRAs** below in our section under “**Your Data Protection Rights**”.

The personal information we may collect from you will also be shared with **FPAs** who will use it to prevent fraud and money-laundering and to verify the identity of relevant parties related to the application.

If fraud is detected, you could be refused certain services, finance, or employment. Further details of how your information will be used by us and these **FPAs**, and your data protection rights, can be found via [CIFAS](#).

If you are deemed to pose a fraud or money laundering risk, **FPAs** may hold your personal information for up to six years.

Marketing

We may use your personal information to send you marketing communications about our products and services that may be of interest to you. You have the right to opt out of receiving such communications at any time via the following contact details:

Address: AW House, 6-8 Stuart Street, Luton, LU1 2SJ

Email Address: DPO@gable.group

Currently, Gable Mortgages does not issue any direct marketing communication to mortgage applicants or mortgage customers.



International transfers

If we transfer your personal information outside the UK, we will ensure that appropriate safeguards are in place to protect your personal information. For example, we will only transfer your personal information to countries that have been deemed by the UK to provide an adequate level of protection for personal information, or we will ensure we have carried out appropriate due diligence on the data importer and that we have protective contractual arrangements in place with them to give the transfer of personal information the same protection as it has in the UK. If you would like more information on this, please contact us at: DPO@gable.group.

Automated Decision Making

We may use automated decision-making processes to assess your creditworthiness, affordability and to identify any fraud or money laundering risks. You have the right to request human intervention, express your point of view, and contest the decision.

How We Store Your Personal Information

We store your personal information securely and only for as long as necessary to fulfil the purposes for which it was collected.

If you apply for a mortgage account with us, or have had a mortgage account with us in the past, we will keep your data for up to ten years after the last contact with you (and/or your intermediary), or the closure of your mortgage account.

We retain this information in order to:

- Investigate and respond to any queries or complaints that are raised during your interactions with us;
- Provide customers with the best possible service, ensuring we are treating customers fairly and that our products and services represent fair value, through regular reviews;
- Keep accurate records according to the relevant legislation that applies to us; and
- Show that we are meeting our legal and regulatory obligations.

There may be certain scenarios where we may need to retain your information for longer than this, for example, if there are any legal, regulatory, or technical reasons. If we need to do this, we will continue to ensure that your privacy is protected and it is used for legitimate purposes only.



We have appropriate technical and organisational measures to prevent unauthorised access, disclosure, alteration, or destruction of your personal information. 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.

Your Data Protection Rights

You have the following data protection rights:

- **Right to access your personal information.** This is commonly known as a 'subject access request' and enables you to receive a copy of the personal data we hold about you.
- **Right to rectify your personal information if it is inaccurate or incomplete.** However, please note that we may need to verify the accuracy of the new data you provide to us.
- **Right to erasure of your personal information in certain circumstances.** For example, where there is no good reason for us to continue to process it or where we may have processed your information unlawfully. However please note 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.
- **Right to restrict processing of your personal information.** This means you can ask us to suspend the processing of your personal data in one of 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; or
 - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Right to object to the processing of your personal information** where we are relying on a legitimate interest as the legal basis for that particular use of your data. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object.
- **Right to data portability of your personal information.** You have the right to ask that we transfer personal information you gave us to another organisation or to you, in certain circumstances.
- **Right to withdraw your consent** at any time if we rely on your consent as the legal basis for processing your personal information.



If you wish to exercise any of the rights set out above, please contact our Data Protection Officer using the contact details provided above. You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

The Credit Reference Agency Information Notice (**CRAIN**) outlines the methods of using and exchanging personal data by the three primary credit reference agencies in the UK. You can access the **CRAIN** on the official websites of these credit reference agencies for further information about how they process and use data:

- www.transunion.co.uk/crain
- www.equifax.co.uk/crain
- www.experian.co.uk/crain

How to Complain

If you have any complaints or concerns about how we handle your personal information, please contact us using the contact details below. We will investigate your complaint and we will aim to resolve your complaint within 4 weeks of receiving it, for more complex complaints this may take up to 8 weeks.

Address: AW House, 6-8 Stuart Street, Luton, LU1 2SJ

Email Address: DPO@gable.group

If you are not satisfied with our response or believe that we have not complied with data protection law, you have the right to lodge a complaint with the Information Commissioner's Office (**ICO**) at the following details.

Address: Information Commissioner's Office, Wycliff House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

Changes to the privacy policy

We keep our privacy policy under regular review. This version was last updated: August 2024.

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, for example a new address or email address.