

## Use of Client Information

This statement provides an overview of how Brilliant Solutions (referred to in this statement as 'we' and 'us') uses your personal information and explains your rights in relation to your personal information. Brilliant Solutions is a data controller under the definition given under the General Data Protection Regulation, this is because we may decide how your information is used. Brilliant Solutions is a trading name of Exclusive Connections Limited.

## What information do we collect?

We only collect information about you that we require in order to process your application with us and our lender partners. We may collect the following information about you:

- your contact details including your name, address, previous addresses, phone numbers and email address
- your financial status - such as your employment, income, assets and debts
- identification and verification details including your date of birth
- your credit history - including any defaults, County Court Judgements (CCJ's) and arrears
- preferences - Including marketing selections and history
- communication logs and history, covering all forms of communication including call recordings
- technical information - Your Internet Protocol (IP) address, when using online services including our website.

We may also receive information from third parties including:

- Government or national institutions such as Companies House or the Land Registry
- Credit Reference Agencies (Including Equifax, Experian and CallCredit)
- Your mortgage broker, IFA or similar intermediary

## How do we use your information?

We may use your personal information in the following ways:

- to process your enquiry and any subsequent application for finance, including to carry out checks with credit reference agencies and fraud prevention agencies
- to respond to your queries
- to provide you with products and services
- to help us improve our services
- for trend analysis to help us develop and improve our products and services
- to comply with our legal and regulatory obligations
- to prevent fraud and money laundering; or
- to deal with any complaints or legal claims.

## Marketing

We may use your personal information to make decisions about products and services we think you may be interested in. This is what we mean by 'marketing'.

We can only use your personal information to send you marketing messages if we have either your consent or a 'legitimate interest'. That is when we have a business or commercial reason to use your information. It must not conflict unfairly with your own interests. You can withdraw your consent and ask us to stop processing your information for Legitimate Interests at anytime by either contacting us or selecting unsubscribe on any email you receive from us.

We do not sell the information we have about you to any external organisations.

## Our lenders

As part of our work to identify the best financial product for your needs we will need to share your information with lenders or other relevant providers. We will only do so where we need to in order to provide the service you have requested and we will only provide information that could be reasonably considered relevant. Depending on the nature of the information and the recipient, the recipient may issue their own notice on how they use your information. You can find up to date information at [www.brilliantolutions.co.uk/data/](http://www.brilliantolutions.co.uk/data/)

## Security

We are committed to ensuring your information is secure. To prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect.

## **Data transfers**

Whenever Brilliant Solutions transfer your personal data outside the European Economic Area (EEA), either we impose contractual obligations on the recipients of that data to protect your personal data to the standard required in the EEA or we will transfer it to an entity covered by certified equivalent standards or acceptable international frameworks.

## **What is the legal basis for our use of your information?**

Where we use your personal information, we must have a legal basis that justifies our use of your information. The following are the legal bases under which we process your data:

### **Consent**

We may have requested or may request specific consent to obtain and process your personal information. If provided it will have been provided in a clear and deliberate manner. This consent can be withdrawn at any time but will not affect our rights to process your personal information under any alternative legal justifications.

### **Contract**

We can rely on this lawful basis as it is necessary to process your personal data: to fulfil our contractual obligations to you or because you have asked us to do something before entering into a contract.

### **Legal Obligation**

We rely on this lawful basis as we need to process personal data to comply with a common law and statutory obligation including rules imposed by the Financial Conduct Authority

### **Legitimate Interests**

Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data.

## **How do we share your personal information?**

Brilliant Solutions use the services of Sub-Processors to provide us with technology services, software providers, compliance support, accountancy services and other third party service providers. These are required for the operation of the business as a whole and also for the provision our products and services.

We maintain a list of the companies that we use on our website along with links to their own privacy policies, please visit [www.brilliantolutions.co.uk/data/](http://www.brilliantolutions.co.uk/data/) for up to date information.

We have written agreements with all our Sub Processors in accordance with the General Data Protection Regulations. We will restrict our Sub Processors access to what information is necessary to provide the required service.

We will also share your personal information in the following circumstances:

- where needed to comply with our legal or regulatory obligations (which may include sharing with regulators)
- where necessary to protect or defend our legal rights or the legal rights of another company or person
- if our business or any part of it is sold, we will transfer your personal information to the purchaser.

## **For how long do we keep your information?**

If we are unsuccessful in providing you with a relevant product or service we will keep your information for as long as necessary to comply with the terms of this notice which includes the purpose of making a legal defence against any future complaint. This will be a minimum of 12 months following the cessation of provision of products and services.

If we provide you with a product or service, we will keep your information for as long as necessary to comply with the terms of this privacy notice which includes the purpose of making a legal defence against any future complaint and in any case, for a minimum of 7 years from the date the product or service has fully terminated.

Where you have provided consent to receive our marketing communications we will keep your contact information whilst we are actively communicating with you or until you ask us to stop sending you such communications. This may not affect communications provided to you where the legal justification for doing so is not based on consent.

## Your rights

You have a number of rights in relation to your information:

### 1. The right to be informed

You have the right to be informed about the collection and use of your personal data. You must be provided with information including: the purposes for processing your personal data, the retention periods for that personal data, and who it will be shared with. This is provided within this document.

### 2. The right of access

You have the right to access your personal data and supplementary information. Access allows you to be aware of and verify the lawfulness of the processing. You have the right to obtain; confirmation that your data is being processed, access to your personal data and other supplementary information.

### 3. The right to rectification

You have the right to have inaccurate personal data rectified or completed if it is incomplete. You can make a request for rectification verbally or in writing.

### 4. The right to erasure

You have the right to have personal data erased. You can make a request for erasure verbally or in writing. The right is not absolute and only applies in certain circumstances. The right to erasure does not apply if processing is necessary for one of the following reasons:

- to exercise the right of freedom of expression and information
- to comply with a legal obligation
- for tasks carried out in the public interest or in the exercise of official authority
- for archiving purposes in the public interest, scientific research, historical research or statistical use where erasure is likely to render impossible or seriously impair the that processing
- for the establishment, exercise or defence of legal claims.

### 5. The right to restrict processing

You have the right to request the restriction or suppression of personal data. This is not an absolute right and only applies in certain circumstances. When processing is restricted, we are permitted to store the personal data, but not use it. You can make a request for restriction verbally or in writing.

### 6. The right to object

You have the right to object to:

- processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling)
- direct marketing (including profiling)
- processing for purposes of scientific/historical research and statistics.

You also have a right to complain to the Information Commissioner's Office; <https://ico.org.uk/> which regulates the processing of personal data

## Complaints

If you have any complaints about the way we use your personal information please contact [complaints@brilliantolutions.co.uk](mailto:complaints@brilliantolutions.co.uk) who will try to resolve the issue. If we cannot resolve any issue, you have the right to complain to the Information Commissioner.

## Want to find out more? Contact us

Email: [enquiries@brilliantolutions.co.uk](mailto:enquiries@brilliantolutions.co.uk)

Phone: 01792 277 555

Write to: Brilliant Solutions, Suite A, 2nd Floor, 11-12 Wind St, Swansea, SA1 1DP