

How we use your 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 and Brilliant Solutions is a trading name of Exclusive Connections Ltd.

A. What information do we collect?

We only collect information we need to process your application with us and our partners. We collect the following information:

- (i) Contact details including name, address, previous addresses, phone numbers & email;
- (ii) Information about your financial status, including employment status, income, assets and existing debts;
- (iii) Identification and verification details including your date of birth
- (iv) Your credit history including any defaults, County Court Judgements (CCJ's) and arrears
- (v) Communication logs and history, covering all forms of communication including call recordings
- (vi) Technical information, your Internet Protocol (IP) address, when accessing our website or online services.

We may receive information from third parties including:

- (vii) Government or national institutions such as Companies House or the Land Registry
- (viii) Credit Reference Agencies (Including Equifax, Experian and Callcredit)
- (ix) Your Mortgage Broker, IFA or Similar Intermediary that has introduced you to us

B. How do we use your information?

We use your personal information in the following ways:

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

We do not typically conduct automated decision making or profiling but we reserve the right to if it is in your best interests to do so.

C. Marketing

We may use your personal information to make decisions about what products and services we think you may be interested in. This is what we mean when we talk about '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 any time by contacting us or selecting unsubscribe on any email you receive from us. **We do not sell the information we have about you.**

D. Telephone Calls

All of our telephone calls are monitored or recorded for quality assurance and training purposes and the recordings may be used by 3rd parties, in line with this policy, to analyse the data within and help us deliver and improve our services to you.

E. Security

We are committed to secure your information. In order to prevent unauthorised access or disclosure, we have suitable physical, electronic and managerial procedures to safeguard and secure the information we collect.

F. Our Lenders & Providers

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 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 data and they may conduct automated decision making activity, including profiling.

G. Data transfers

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

H. 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:-

- 1. 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 data under alternative legal justifications.
- 2. Contract:** Where necessary to process your personal data to fulfil our contractual obligations to you or because you have asked us to do something before entering a contract.
- 3. Legal Obligation:** We need to process personal data to comply with a common law and statutory obligation including rules imposed by the Financial Conduct Authority.
- 4. Legitimate Interests:** Processing is necessary for the purposes of legitimate interests pursued by the controller or by a third party except where such interests are overridden by interests or fundamental rights and freedoms of the data subject which require protection of personal data.

I. How do we share your personal information?

We 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 include telephone providers and data analysis and processing companies that are required for the operation of the business as a whole and required for the provision of our products and services. Some may use this data to develop their systems and services but will not pass on or sell your personal data to 3rd parties or use your personal data to contact you in any way. These companies may use your data to provide anonymous aggregated insight which will in no way result in the disclosure of personal information to any other parties.

Brilliant Solutions has written agreements with all of its Sub Processors in accordance and compliance with the General Data Protection Regulations. We will restrict our sub processors access only to what information is necessary to provide the required service to us. For a list of these businesses and their data policies please contact us.

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

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

J. For how long do we keep your information?

If we are not successful 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 privacy notice which includes the purpose of making a legal defence against any future complaint. This will be a minimum of 12 months after the provision of services ends.

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 on an on-going basis whilst we are actively communicating with you or until you ask us to stop sending you marketing communications. This may not affect information and communications provided to you where the legal justification for doing so is not based on consent.

K. Your rights

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 information is provided within this document.

2. The right of access to your personal data and supplementary information

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

3. The right to rectify inaccurate data or to complete incomplete data

You can make a request for rectification verbally or in writing.

4. The right to erasure of personal data

You can make an erasure request verbally or in writing. The right is not absolute and only applies in certain circumstances. It does not apply if processing is necessary for:

- (i) to exercise the right of freedom of expression and information
- (ii) to comply with a legal obligation
- (iii) for the performance of a task carried out in the public interest or the exercise of official authority. This includes for archiving purposes, scientific research historical research or statistical purposes where erasure is likely to render impossible or seriously impair the achievement of that processing
- (iv) for the establishment, exercise or defence of legal claims.

5. The right to request data in a portable format

Where we process the data by automated means you can request the data in a structured, commonly used and machine readable format. This allows software to extract elements of the data and enables other organisations to use the data. We do not typically use data for any automated decision-making or profiling as explained in Section B.

6. The right to restrict processing or suppress processing

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

7. The right to object

You have the right to object to:

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

8. Automated decision making, including profiling

Whilst we do not typically conduct automated decision making or profiling (See Section B), in the event this is conducted, the rules and guidance issued by the regulators will be followed. This relates to any form of automated processing of personal data intended to evaluate a natural person and this includes, for example, predictions relating to this individual relating to behaviour, health, location, financial, reliability and preferences.

L. Complaints

If you have any complaints about the way we use your personal data, contact complaints@brilliant-group.co.uk who will try to resolve the issue. If you do not receive a confirmation of receipt within 1 working day, please confirm that the email has been received using the contact details below. If we cannot resolve any issue, you have the right to complain to the Information Commissioner's Office; <https://ico.org.uk/> which regulates the processing of personal data.

M. How to find out more

You can contact us via Enquiries@Brilliant-Group.co.uk or phone 01792 277 555 or write to us at:
Brilliant Solutions, Suite A, 2nd Floor, 11-12 Wind Street, Swansea, SA1 1DP.