

PRIVACY & AI POLICY

How we use and protect your personal information, and how we use AI responsibly

Version: October 2026

This policy explains, in plain English, what personal information we collect, why we need it, who we share it with, how we use technology including artificial intelligence (AI), and the choices you have. It sits alongside the privacy notice and consent form we ask you to complete when you become a customer, and the two say the same thing.

If you'd rather talk it through, or you'd like this policy in large print, another format or another language, just ask. Call **01329 556553** or email info@lawsonfinancial.co.uk.

The short version

- **We only collect what we need** to give you advice and arrange your mortgage or insurance.
- **We never sell your information.** We only share it where it's needed, such as with the lender or insurer you're applying to.
- **Sensitive details**, such as health or difficult life events, are only used to support you, with your explicit consent, and never to treat you unfairly.
- **A qualified person gives your advice, never AI.** We use AI tools to help with admin and writing, under strict rules.
- **We won't introduce you to another firm** without telling you who they are, any fee we receive, and getting your agreement first.
- **You're in control.** You can see, correct or delete your information, change your mind about consent, or complain, at any time.

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1. Who we are

Lawson Financial Ltd ("we", "us") is a mortgage and protection broker. We're authorised and regulated by the Financial Conduct Authority (FCA), firm reference number 726389. You can check this on the FCA Register.

We're the **data controller** for the personal information we hold about you, which means we decide how it's used and we're responsible for looking after it. We're registered with the Information Commissioner's Office (ICO).

We follow the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (both as amended by the Data (Use and Access) Act 2025), the Privacy and Electronic Communications Regulations (PECR), and the

FCA's rules, including the Consumer Duty.

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2. What we collect

What we need depends on what you're asking us to help with. It may include:

- **Who you are:** name, date of birth, contact details and identity documents (such as passport, driving licence and proof of address).
- **Your finances:** income, spending, savings, assets, debts, existing borrowing and credit history.
- **Your work:** employer, occupation, employment status and how long you've been there.
- **The property:** details of your current or proposed home, mortgage and related arrangements.
- **Your needs and plans:** what you want to achieve, so our advice is suitable for you.
- **Health and personal circumstances:** only where it's needed for a protection or insurance application, or where you choose to tell us so we can support you better (see section 5).
- **Criminal convictions:** only where a lender or insurer asks for it.
- **How we've been in contact:** emails, messages, call notes, meeting notes and documents you send through our secure portal or otherwise.
- **Website information:** what you send through forms on our website, plus basic technical data (see section 11).

If you give us information about someone else, such as a joint applicant, a partner or a dependant, please make sure they're happy for you to do so and point them to this policy.

3. Where it comes from

Most of it comes straight from you. With your agreement, we may also get information from:

- lenders, insurers and product providers, including the results of credit checks they carry out with credit reference agencies
- your employer, accountant or a previous adviser, for example to confirm income
- solicitors, conveyancers and estate agents involved in your purchase or remortgage
- a partner firm we've introduced you to, about the progress of that introduction (see section 9)
- whoever referred you to us, if someone did
- public sources, such as the electoral roll or Companies House, where relevant.

4. How we use it and our legal reasons

Data protection law says we must have a valid legal reason (a "lawful basis") for each thing we do with your information. Here's how that works in practice:

What we do	Our legal reason
Give you advice, research products, and submit and manage applications with lenders and insurers	Contract – it's needed to provide the service you've asked for
Check your identity, prevent money laundering and fraud, keep records the FCA requires, and handle complaints	Legal obligation
Run our business properly: compliance checks, file reviews, quality checks, IT and security, and using approved technology (including AI tools) to help with admin	Legitimate interests – we always balance these against your rights and expectations
Use health or personal-circumstances information to support you and tailor our advice	Explicit consent , or for insurance applications where the law specifically allows it
Use criminal-conviction information where a lender or insurer requires it	Your consent, or where data protection law specifically allows it for insurance
Introduce you to a trusted partner	Your agreement , given before we share anything
Contact you to review your arrangements, for example before your rate ends	Your agreement , which you can change at any time
Send you news and helpful guides	Consent – only if you've said yes

Where we rely on consent, you can withdraw it at any time. This won't affect anything we've already done lawfully, but it may limit how we can help you, and we'll explain if that's the case.

5. Sensitive information and extra support

Life can affect how any of us deal with money and big decisions. If you tell us about your health, a life event (such as bereavement, job loss or separation) or anything that makes things harder, we can adapt how we work with you: more time, a different way of explaining things, or making sure what we recommend still works if your circumstances change.

Telling us is entirely your choice. When you do:

- we only use it to help you, and it will **never** be used to treat you unfairly
- we treat health information as “special category” data, which has extra legal protection, and we only use it with your explicit consent (or, for insurance applications, where the law specifically allows it)
- we only share it with a lender or insurer where it's needed for your application and you've agreed
- you can ask us to update or remove it at any time.

If you're affected by domestic or economic abuse, you don't need to write anything down. Call or email us and we'll talk privately, at a time and in a way that's safe for you, and agree how to contact you safely.

If you'd like someone you trust to be involved, such as a family member or friend, we're happy to arrange it. If you want someone to speak to us on your behalf, we'll ask you to sign a third-party authority first, and we'll still check

important decisions with you directly.

6. Our use of artificial intelligence (AI)

We sometimes use AI tools to make our work faster and more efficient, so we can spend more time on you. We want to be open about how we do this, and you should feel confident that it never replaces the personal service and regulated advice you get from us.

How we use AI

- Drafting guides, articles and marketing material, which a person checks before it's published
- Summarising product information and market research for our own use
- Admin tasks, such as templates and organising workflows
- Help with meeting notes, only as set out below

What AI will never do

- Give you mortgage or protection advice. A qualified adviser does that.
- Make decisions about your application or financial situation
- Be used in a way that unfairly disadvantages or discriminates against anyone

How we keep it safe and fair

- **People stay responsible.** Every recommendation comes from a qualified adviser, who stays fully accountable for it. We remain responsible for the advice and service you receive.
- **We check what AI produces.** Anything AI helps create is checked by a person for accuracy before it's relied on or shared with you.
- **Your data stays protected.** We don't put your identifiable personal or financial information into AI tools unless the tool has been assessed and approved by us as secure and compliant with UK data protection law.
- **We keep it to what's needed.** We use AI tools from established providers and, where we can, remove or limit identifying details before using them.
- **We review it.** We regularly review the tools we use for accuracy, fairness and security, and our team is trained to use them responsibly.

AI in meetings and calls

From time to time, we may use an approved AI tool to help record and take notes during meetings or calls. If you'd prefer we didn't use one with you, just tell us at any time and we won't. Saying no won't affect your service in any way. Your adviser checks any AI-assisted notes, and they become part of your file in the usual way.

Lenders, insurers and other firms

The lenders, insurers, partners and other firms we work with may use their own technology, including AI and automated systems, for example when they assess applications. They're responsible for their own use of AI and will explain it in their own privacy notices.

If you have any questions about how we use AI, just ask.

7. Automated decisions

We don't make decisions about you using fully automated processes. Lenders and insurers may use automated credit scoring or underwriting. Where they do, you have the right to ask for a person to review the decision, to give your point of view and to challenge it. Their privacy notices explain how.

8. Who we share it with

We only share what's needed for the purpose, and we **never sell your information**. Depending on what you need, we may share it with:

- the mortgage lenders, insurers and product providers you're applying to
- solicitors or conveyancers, surveyors and estate agents involved in your purchase or remortgage
- mortgage clubs, packagers and specialist distributors we use to find products
- our compliance consultants, auditors, and IT, software, secure-storage and approved AI providers, under contracts that require them to protect your information and only use it on our instructions
- the FCA, the Financial Ombudsman Service, the ICO, HMRC, fraud prevention agencies or the police, where the law requires or allows it
- our carefully selected and trusted partners, where you agree (see section 9).

Lenders and insurers will usually search credit reference agencies and fraud prevention agencies as part of your application. To find out how credit reference agencies use your information, see the Credit Reference Agency Information Notice (CRAIN).

9. Introductions to trusted partners

Sometimes you'll need help with something we don't provide ourselves, for example life insurance, critical illness or income protection cover, some home insurance, or legal, will-writing, tax or other specialist advice. Where it's in your interests, we may introduce you to one of a small number of firms we've carefully selected, checked and continue to review to make sure they deliver good outcomes for our customers.

Before we introduce you, we will:

- tell you who the partner is, what they do and why we think they can help
- check they're authorised by the FCA where the service is regulated
- tell you if we receive a fee or commission for the introduction and, where we know it, how much
- only share the information they need, and only with your agreement.

For example, we arrange life and critical illness cover in partnership with **The Insurance Surgery**. If you're introduced to them, they'll keep us updated on progress, including when they've tried to contact you, and we keep this on your file so we can make sure you're looked after. Buildings and contents insurance is arranged by us directly or by introduction to a partner.

Once you've been introduced, the partner is a separate firm. They're responsible for their own advice and service and for how they use your information, and they'll give you their own terms and privacy notice. An introduction

doesn't mean you've agreed to marketing from them. You're never under any obligation to use a partner, and saying no won't affect the service you get from us.

10. Keeping in touch and marketing

- **About your arrangements:** we'll contact you about your application and anything we need to do for you.
- **Reviews:** if you've agreed, we'll get in touch to review your mortgage and protection, for example before your rate ends. We think this is valuable, but it's your choice.
- **News and guides:** we'll only send these if you've said yes. Every message tells you how to unsubscribe, or you can just tell us.

You can change any of these preferences at any time by contacting us.

11. Our website and cookies

Our website uses cookies, small files stored on your device. We use:

- **Essential cookies** that the website needs to work properly and securely. These can't be switched off.
- **Analytics cookies** that tell us, in summary, how people use the site so we can improve it. You can opt out of these at any time through the cookie settings on our website or your browser.

We don't use cookies to show you advertising. If you contact us through a form on our website, we use what you send to reply and, if you go ahead, to provide our service. Our website may link to other sites, such as lenders or the FCA; they have their own privacy policies.

12. Keeping your information safe

We use appropriate technical and organisational measures to protect your information from loss, misuse, unauthorised access, disclosure or alteration. This includes secure systems and portals, access controls, and data protection training for everyone in our team. Any firm that stores or processes data for us must show it meets UK data protection law.

Most of your information is held in the UK. Some of our technology providers, including some AI and software providers, may store or process data outside the UK. When that happens, we make sure the safeguards UK law requires are in place, such as the country being approved by the UK Government, or approved contract terms.

If something goes wrong that's likely to put you at high risk, we'll tell you promptly, and we'll report it to the ICO where the law requires.

13. How long we keep it

We keep your information for as long as we need it to meet our legal and regulatory duties. This is usually **at least six years** after our relationship ends. We may also keep information longer where the law, the FCA or a possible complaint or legal claim requires it. After that, we securely delete or destroy it.

14. Your rights

You have the right to:

- **see** the information we hold about you and get a copy
- ask us to **correct** anything that's wrong or incomplete
- ask us to **delete** your information, where the law allows
- ask us to **limit**, or **object** to, how we use it
- ask us to **move** your information to another organisation
- **withdraw your consent** at any time
- ask for a person to review any decision made about you by automated means.

Some rights depend on our legal reason for using your information. For example, we can't delete records the FCA requires us to keep. If that's the case, we'll explain why.

To use any of these rights, contact us by phone, email or post. There's normally no charge, and we'll reply within one month. If your request is complex, we may need longer, and we'll tell you why within that month.

15. If you're unhappy

About your information: please tell us first, by phone, email, post or however suits you, and we'll do our best to put it right. We'll acknowledge your complaint within 30 days and look into it without undue delay. You can also complain to the Information Commissioner's Office at ico.org.uk or on 0303 123 1113.

About our advice or service: ask us for a copy of our complaints procedure. If you're not happy with our response, you may be able to refer your complaint to the Financial Ombudsman Service.

16. Changes to this policy

We review this policy at least once a year, and sooner if the law, our services or the technology we use changes. The latest version is always on our website, and we'll let you know directly about any change that significantly affects you.