# Quanstrom Financial

About our Services

# QUANSTROM FINANCIAL: ABOUT US AND HOW WE WORK WITH YOU

Quanstrom Financial is a trading style of Q Mortgages and Protection Ltd. which is an Appointed Representative of JLM Mortgage Network Ltd, which is authorised and regulated by the Financial Conduct Authority, Registration Numbers 1000783 and 300629.

You can check this on the FCA's Register by visiting the website https://register.fca.org.uk/ or by contacting the FCA on 0800 111 6768.

Q Mortgages and Protection Ltd. registered office: 126 Wish Hill, Eastbourne, East Sussex BN20 9HL

## Client Classification

Quanstrom Financial classifies all clients as 'consumers' for both mortgage and non-investment insurance business, which means you are afforded all protections under the rules of the Financial Conduct Authority.

Should we need to classify you differently we will discuss this with you, however, you should be aware that you may lose a number of regulatory protections including access to the Financial Ombudsman Service and the Financial Services Compensation Scheme - see below.

## Our Commitment to You

Prior to providing you with any advice we will take time to understand your current needs, circumstances and attitude to risk (where applicable). Any advice provided will be confirmed to you in writing.

Quanstrom Financial takes all our regulatory responsibilities very seriously and we ensure that all our staff are required to demonstrate their competence to undertake their role and our business is structured in a manner that is designed to meet in full all the requirements set by our regulator, the Financial Conduct Authority.

## Methods of Communication

Unless you advise us otherwise, we will communicate with you via the following methods of communication, face to face, e-mail, telephone, letter and digital phone messaging.

## Language

Please note that all our communications and documents will be provided to you in English.

## Client Money

**Quanstrom Financial does not handle clients' money.** We never accept a cheque made out to us (unless it is a cheque in settlement of charges or disbursements for which we have sent you an invoice) or handle cash.

## Introductions to a Third Party

We may receive a fee for making introductions to third party product or service providers.

This may include, but is not limited to:

- Master Brokers
- Surveyors
- Solicitors
- Insurance Providers
- Will and Estate Planning Providers
- Independent Financial Advisers

Confirmation of exact fees are available upon request.

When acting as an introducer, marketer or promoter of a scheme, no responsibility is accepted for any matters arising from the referral to the scheme product provider. It is your responsibility to ensure that you agree separate Terms & Conditions with the third-party.

## Data Protection

Full details of our Data Protection policy are provided at the end of this document and can also be found at https://jlmmortgages.co.uk/privacy-notice/

# MORTGAGE SERVICES

## Whose Products We Offer

We offer a comprehensive range of mortgages from across the market. However, we may not able to offer certain products that can only be obtained by going direct to a lender. We may also be able to access some products which are not available direct to consumer.

## Alternative Finance Options

We also offer the following alternative finance options:

- A further advance from an existing lender
- Consumer buy to let mortgage
- Secured loan/second charge mortgage
- A re-mortgage
- Bridging finance

## Which Service Will We Provide You With?

We will advise and make a recommendation for you after we have assessed your needs.

## What Will You Have to Pay Us for This Service?

We will not charge a fee when we arrange a product transfer for you.

We will be paid commission by the lender.

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We will charge a fee of £695 when we arrange your mortgage. The fee will be reduced by the amount of commission we are paid by the lender. Where the commission we receive from the lender exceeds £695, we will not charge a fee. In many cases, no fee will be payable. If you do not proceed with a mortgage that has gone to offer a £495 fee will be charged.

We will also be paid commission by the lender.

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For existing customers, we will not charge a fee for a remortgage application.

We will be paid commission by the lender.

An existing customer is defined as a customer who has completed on a mortgage application and purchase and requires refinancing options on the same security.

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For complex cases, we will charge a fee of £495 when we arrange your mortgage. This fee is due once you receive your offer. If you do not proceed with a mortgage that has gone to offer, the £495 fee will be charged.

We will also be paid commission by the lender.

A complex mortgage case is defined where the client's situation is in any one of the following categories; newly self-employed, complex income, adverse credit, non-standard lending requirements, living abroad, development finance, or who require a bespoke solution to a highly complex finance need.

You will receive an illustration when considering a particular mortgage, which will tell you about any fees relating to it. We will confirm which fee scale will apply before making an application.

Where a referral is made to a third-party to advise you on your mortgage arrangements, a broker fee will be applied in line with the fees above, to cover the administration costs of the mortgage review.

You may request a full list of all the lenders we use, listing the procuration fees payable.

### Refund of Mortgage Fees

In the event that you do not proceed with a mortgage that has gone to offer, the fee must be paid within 14 days.

## NON – INVESTMENT AND GENERAL INSURANCE SERVICES

### Non-Investment and General Insurance Permissions

Quanstrom Financial is permitted to advise on and arrange (bring about) deals in non-investment and general insurance contracts.

We are an insurance intermediary and act on behalf of clients and not insurers.

### Non-investment Insurance Services

We offer a personal recommendation on the basis of a fair and personal analysis of the market

### What Will You Have to Pay Us for This Service?

No fee, we will be paid commission by the provider.

## CONFLICTS OF INTEREST

We have a legal and regulatory obligation to take all appropriate steps to identify and to prevent or manage conflicts of interest from arising. In the event of any of our business interests or activities creating a potential conflict of interest we will ensure that we take all appropriate steps to manage the potential conflict by maintaining robust systems, controls and staff training. In the unlikely event that we are unable to prevent the potential conflict, we will fully disclose to you, the general nature and/or sources of conflicts of interest and the steps taken to mitigate those risks.

Further details of our conflict-of-interest policy are available upon request.

## IMPORTANT INFORMATION

### Overseas clients – non-EEA territories:

All advice is regulated under UK law and regulation and should be deemed to have taken place in the UK.

By proceeding with advice or any recommendation or mortgage application via JLM, you are thereby confirming that you accept these terms and that any dispute, expression of dissatisfaction or legal action will need to follow the

process required by the UK regulators and will be dealt with through the UK courts and governed by UK law.

## Complaints

If you wish to register a complaint, please contact JLM Mortgage Network;

- In writing; The Compliance Manager, JLM Mortgage Network Ltd. 21a Churchyard, Hitchin, Hertfordshire SG5 1HP
- By email: compliance@jlmms.co.uk
- By phone: 01462 455 655

If you cannot settle your complaint with us, you may be entitled to refer it to the Financial Ombudsman Service. You can;

- Visit the website and fill out the online form http://www.financial-ombudsman.org.uk
- Write to Exchange Tower, Harbour Exchange, London E14 9SR
- Email: complaint.info@financial-ombudsman.org.uk

**Please note that the Financial Ombudsman Service does not handle complaints relating to buy to let mortgages and other forms of non-regulated borrowing.**

## Compensation Arrangements

We have briefly set out some information about the Financial Services Compensation Scheme (FSCS) below. If you would like further information about compensation scheme arrangements, details are available at www.fscs.org.uk or call 0800 678 1100.

Most of the products we advise on are covered by the Financial Services Compensation Scheme (FSCS). You may be entitled to compensation from the scheme if product providers or we cannot meet our obligations. This depends on the type of business and the circumstances of the claim.

The actual level of compensation you receive will depend on the basis of your claim. The FSCS only pays compensation for financial loss. Compensation limits are per person per firm, and per claim category (listed below).

**Protection and non-Investment Insurance mediation**

Protection is at 100% without limit, where the claim is in relation to a long-term care insurance contract that is a pure protection contract, or the claim is in respect of a liability subject to compulsory insurance.

In all other cases: 90% of the claim without limit.

**Mortgages**

Mortgage advising and arranging is covered for 100% of the first £85,000, so the maximum compensation is £85,000 per person per firm.

**Please note that the FSCS does not cover buy to let mortgages and other forms of non-regulated borrowing.**

# DATA PRIVACY NOTICE

## Introduction

As a controller, Quanstrom Financial (“we”, “us”, “our”) comply with all applicable data protection and privacy legislation in force from time to time including the UK General Data Protection Regulation, the EU General Data Protection Regulation (where applicable) (together the “GDPR”) and the Data Protection Act 2018. (“DPA18”). This privacy notice details how we process your personal data.

Quanstrom Financial may appoint professional Registered Individuals to provide our services to you. In this instance, whilst entered into the business relationship, the Registered Individual is joint controller of the personal data they process.

Under the UK GDPR we are required to notify the Information Commissioner's Office ("ICO") about our use of personal data. You can view our current controller registration on the ICO website here:

https://ico.org.uk/ESDWebPages/Entry/ZB602893

We place great importance on ensuring the quality, confidentiality, integrity and availability of the data we hold and in meeting our data protection obligations when processing personal data. Quanstrom Financial is committed to protecting the security of your personal data. We use a variety of technical and organisational measures to help protect your personal data from unauthorised access, use or disclosure.

We collect personal data about a range of people:

- Visitors to our websites
- People who contact us (enquirers)
- Clients (including clients of the businesses operating under us)
- Contractors and suppliers

If you are applying, or have applied to work with us, please refer to our job applicant privacy notice.

## What personal information we process

We process personal information to act as an intermediary for financial transactions; typically to advise and apply for property finance such as mortgages or similar for clients. The same applies to advising and arranging insurance policies.

To understand how any personal information other than that provided to us through this website is processed you will need to refer to any personal communications you receive from us, check any privacy documents provided when entering into a contract with us, or contact us to ask about your personal circumstances.

## Enquirers

When you contact us, we ask for some personal information. You are under no obligation to provide this information to us. Providing that information, enables us to give you the right information or services that you ask for, or notify you of further information required to facilitate that service.

If we would like to use your information for any other purpose than those stated above, we will contact you.

As a minimum, we will hold your name and phone number for the purposes specified above. If you do not become a client of ours, your information will be erased in line with our retention policy.

## Visitors to Our Website

We use Google Analytics on our website (http://www.quanstromfinancial.co.uk/) to provide statistics to help us give visitors the best experience when using our sites. IP addresses are collected to see how users interact with our site. Our website uses cookies, which is a string of information that a website stores on a visitor's computer, and that the visitor's browser provides to the website each time the visitor returns.

We use cookies to help identify and track visitors and their website access preferences. Website visitors can control which types of cookies are placed on their browser by adjusting the cookie settings in the cookie controller button, which can be found at the bottom left-hand corner of our website.

## Our Clients Views

We want to receive your views on the service you received from us and any improvements you think are necessary. We use Trustpilot® as a data processor to collect feedback from our customers on our behalf and to support our marketing activities. If this is something you agree to help us with, we will share your name and email address with Trustpilot® in order to generate a review invite and confirm you are a verified customer of Quanstrom Financial.

## Regulatory Functions and Reporting

As a regulated firm we are required to retain and provide information to the FCA regularly. We must also share regulatory data with our principal firm, JLM Mortgage Network. Most of the information is provided to us under the Financial Services and Markets Act 2000. JLM Protection Ltd may contact you regarding your protection arrangements as part of the Groups regulatory functions.

## Purposes & bases for using your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal information in the following purposes and lawful bases:

| Purpose | Lawful Basis for Processing |
|---|---|
| Carrying out due diligence on our clients and performing risk assessments. This includes carrying out standard due diligence checks in relation to financial affordability for the mortgage and insurance products we recommend to you. | Necessary to comply with legal obligations to which we are subject.<br>Our legitimate business interest to assess the risk associated with providing you with our services.<br>When processing sensitive personal data, we do so with your explicit consent. |
| Legal and regulatory compliance and compliance with law enforcement requests. This includes biometric facial recognition to confirm your identity, other checks and monitoring transactions for the purpose of preventing and detecting crime and to comply with laws relating to money laundering, and fraud. Also, sharing information on suspected financial crimes, fraud and threats with law enforcement and regulatory bodies. | Necessary to comply with legal obligations to which we are subject.<br>When processing sensitive personal data, we do so with your explicit consent. |
| Providing our mortgage and insurance advisory and administration services to you, covering any services we provide to you as a private client. | Necessary for the performance of the contract agreement to which you are a party. |
| Maintaining a record of and monitoring clients that consider themselves to be or are considered to be vulnerable. | Necessary to comply with FCA guidance on the fair treatment of vulnerable customers. When processing sensitive personal data, we do so with your explicit consent which can be withdrawn at any time. |
| Managing and developing our relationship with you. This includes providing account management, contacting you for feedback and inviting you to participate in customer satisfaction surveys. | Our legitimate business interest to develop our relationship, collect your feedback, assess your level of client satisfaction and to improve our services. |

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| Sending you marketing information about our similar products and services, our news and events. This includes sending you our news emails, information about our additional services, related information which may be of interest to you and to invite you to our events. | Our legitimate business interest to send you marketing and promotional materials from time to time. This includes providing no obligation loan protection insurance quotes.<br><br>Where we have obtained your consent to send marketing, we rely on such consent as the legal basis.<br><br>You can tell us to stop sending you marketing information at any time by objecting or withdrawing your consent. You can do so by contacting us at compliance@jlmms.co.uk or by using the unsubscribe link in any marketing email you receive from us. |
| Internal management, administrative and organisational purposes. This includes maintaining internal records and carrying out other business administration tasks. | Our legitimate business interest to process your personal data to manage and improve our business processes. |
| Statistics and other data analysis. This includes creating forecasts and business plans, improving our services and developing new services. | Our legitimate business interest to process your personal data to develop and improve our business through aggregated and anonymised reporting and analysis. |
| Sharing data with entities in our group. This includes sharing client records and results of due diligence with our Appointed Representative entities. | Our legitimate business interest to identify and develop shared clients across our network of advisers and to utilise existing due diligence and risk assessment information when providing our clients with services. |
| Sharing data with third parties, including those who process personal data on our behalf. | Our legitimate business interest to share your data with trusted third parties who provide us with services relevant to our provision of services to you, including professional advisers, screening service providers and IT service providers. |

## Sharing your information

We sometimes need to share the personal information with other organisations. Where this is necessary, we are required to comply with all aspects of the UK GDPR.

What follows is a description of the types of organisations we may need to share some of the personal information we process with for one or more reasons. Where a joint application is made, we are not able to restrict data sharing between applicants.

Quanstrom Financial will only collect the information needed so that it can provide you with marketing and consulting services. We do not sell or broker your personal data.

Where Necessary or Legally Required We Share Information With:

- Associates and representatives of the person whose personal data we are processing, including but not limited to; estate agents (if you were introduced to us by one of our agent partners), solicitors, accountants and other professionals.
- Financial organisations
- The Financial Conduct Authority (FCA)
- The Financial Ombudsmen Service (FOS)
- Law enforcement and prosecuting authorities

- Credit reference agencies
- Debt collection and tracing agencies
- Other companies within the same group
- Our service providers
- Courts and tribunals
- Undertaking research
- Consulting and advisory services
- Our professional advisers
- HMRC

Further Disclosure

We may, on occasion, pass your personal information to third parties exclusively to process work on our behalf; for example, a data destruction provider. We always require these parties to agree to process this information based on our instructions and requirements consistent with this Privacy Notice and UK GDPR.

## How we protect your data

Quanstrom Financial takes the security of your data seriously. We have internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused, or disclosed, and is not accessed except by our employees in the performance of their duties. Where we engage third parties to process personal data on our behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of the data.

## How long we retain personal data

To ensure we meet our legal, regulatory and customer obligations, we will retain client information for the following periods.

- An introductory enquiry from a person who we only have limited interaction with is retained for 90 days.
- Any survey information gathered from enquirers or clients is retained for 18 months.
- Any mortgage enquiry, mortgage application and mortgage completion is retained in perpetuity.
- Any life or critical illness insurance product enquiry, insurance product application and insurance policy completion is retained in perpetuity.

## International transfers

It is unlikely that we will ever share your personal data outside the UK or European Economic Area. (the EU member states plus Norway, Iceland and Liechtenstein) (“EEA”). If, however, it becomes necessary for the purposes of providing our services to you, we will only share it with organisations in countries benefiting from a European Commission (“EC”) adequacy decision, approved by the UK ICO, or on the basis of EC Standard Contractual Clauses, approved by the UK ICO, which when reinforced with additional supplementary measures, contractually oblige the recipient to process and protect your personal data to the standard expected within the UK and EEA.

## Your rights

At any point whilst Quanstrom Financial is in possession of, or processing your personal data, all data subjects have the following rights:

- **Right of access** – you have the right to request a copy of the information that we hold about you
- **Right of rectification** – you have a right to correct data that we hold about you that is inaccurate or incomplete
- **Right to be forgotten** – in certain circumstances you can ask for the data we hold about you to be erased from our records
- **Right to restriction of processing** – where certain conditions apply you have a right to restrict the processing of your personal data

- **Right of portability** – you have the right to have the data we hold about you transferred to another organisation
- **Right to object** – you have the right to object to certain types of processing such as direct marketing
- **Right to object to automated processing, including profiling** – you have the right not to be subject to the legal effects of automated processing or profiling

You have the right to access your personal information (subject to certain exemptions). If you wish to find out what information we hold that relates to you, please contact us; details below.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

In the event we refuse your request under rights of access, we will provide you with a reason why, which you have the right to legally challenge.

## Automated decision making

We do not make client or supplier decisions based solely on automated decision making.

## Contact us

This privacy notice does not provide exhaustive detail of all aspects of the collection and use of personal information. However, we are happy to provide any additional information or explanation needed. If you have any questions or complaints, please contact us at:

Data Protection Manager
Quanstrom Financial
126 Wish Hill
Eastbourne
East Sussex
BN20 9HL

Telephone 07472 659 441 or email toby@quanstromfinancial.co.uk

## What if I am still not satisfied?

If you are not satisfied with how Quanstrom Financial has responded to your enquiry, you have the right to complain to the Information Commissioner's Office (ICO), who is the regulator for data protection in the United Kingdom: https://ico.org.uk/for-the-public/

## Changes to this privacy notice

We update this notice from time to time in response to changes in applicable laws and regulations, to our processing practices and to the products and services we offer. When changes are made, we will update our notice on https://jlmmortgages.co.uk/privacy-notice/. Please review this notice periodically to check for updates.