

YOUR MORTGAGE PEOPLE

Combined Initial Disclosure Document

Fair Trade House, 3 Whittle Avenue, Fareham, Hampshire, PO15 5SH T: 01489 346624 E: hello@yourmortgagepeople.co.uk



Hello,

Thank you for your interest in **Your Mortgage People**. We are a whole of market mortgage broker, with a team of qualified Mortgage Advisors and professional Relationship Managers on hand to get the best deal for you.

Enclosed is our Initial Disclosure Document, which provides you with all the information you need to find out who we are and what we do.

In summary Your Mortgage People are:

- Authorised by the Financial Conduct Authority to give professional mortgage advice rather than just information, setting us aside from many other 'experts' in the field.
- Mortgage Advisors who search the whole of market, looking through thousands of available mortgages to get you the best deal to meet your needs.
- An experienced team with years of working in the mortgage industry and other financial markets, offering invaluable insight when it comes to you choosing the best way forward.

If you have any other questions about us or our process, please don't hesitate to contact your advisor.

Your Mortgage People

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Initial Disclosure Document

1. The Financial Conduct Authority

The FCA is the independent watchdog that regulates financial services. This document is designed by the FCA to be given to consumers considering buying certain financial products. You need to read this important document. It explains the service you are being offered and how you will pay for it.

2. Whose products do we offer?

Insurance

offer products from We range insurers for a of non-investment products including insurance Life Cover, Critical Illness Cover, Income Protection Insurance, Accident, Sickness and Unemployment Cover (ASU) and Family Income Benefit. Ask us for a list of providers we use and the products we offer.

We offer Business Protection products from a single insurer.

We offer Buildings Insurance and Contents Insurance from a limited number of insurers.

Mortgages

We offer mortgages from a comprehensive range of first

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charge mortgages from across the market, but not deals that you can only obtain by going directly to the lender.

Second Charge Mortgages

We offer products from a limited number of lenders.

3. Which service will we provide you with?

Insurance

We will advise and provide you with a personal recommendation after we have assessed your needs for non-investment insurance products including Life Cover, Critical Illness Cover, Income Protection Insurance, Accident, Sickness and Unemployment Cover, Business Protection Insurance and Family Income Benefit. We represent you and not the insurer in connection with the services we provide.

Buildings and Contents Insurance

We offer a non-advised sales service. We may ask some questions to narrow down the selection of Buildings and Contents Insurance products that we will provide details on. You will then need to make your own choice about how to proceed.

Mortgages

We offer an 'advised' sales service in relation to Mortgages. This means we will provide advice and make a recommendation for you after we have assessed your specific needs and

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circumstances.

Second Charge Mortgages

We offer an 'advised' sales service in relation to Second Charge Mortgages. This means we will provide advice and make a recommendation for you after we have assessed your specific needs and circumstances.

Alternative Finance Options

You should note that where we provide services in relation to increased borrowing on an existing mortgaged property there may well be alternative options available to you that may be more appropriate. For example, you may be able to obtain a further advance from your existing lender or obtain an unsecured loan for the additional funds. Where your existing mortgage is a first charge against the property, a second charge mortgage may be available and where the existing mortgage is a second charge, a first loan may be available.

4. <u>What will you have to pay us for our services?</u>

Insurance

We will not charge you a fee for arranging an insurance policy. We will be paid commission from the provider.

Buildings and Contents Insurance You may opt for your Buildings and Contents Insurance

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policy to be automatically renewed at the end of the term. You may cancel the automatic renewal element of your insurance policy at any time by contacting the provider using the details shown in your policy documents.

If you opt to pay for your policy by monthly direct debit the provider may automatically renew your policy in 12 months' time and continue to take the new payments from your nominated account, <u>unless you tell us not to</u>.

Mortgages

Your initial consultation is obligation free. Once we have established we can help you and you have decided to proceed, a non-refundable application fee of $\pounds195.00$ is payable.

Our typical broker fee is $\pounds695.00$. However, on complex cases we may charge an increased broker fee, up to a maximum $\pounds2,495.00$ payable on completion of your mortgage. We will usually receive a procuration fee from the lender, this amount is usually calculated as a percentage of the loan amount but varies from lender to lender, the exact amount will be confirmed on your key facts illustration and your mortgage offer.

Fees may vary depending on your circumstance and loan amount. Your mortgage advisor will discuss this fee with you prior to you signing our client agreement and before you

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make a mortgage application. You will receive a mortgage illustration when considering a mortgage which will tell you about any fees relating to it.

In some cases our broker fee can be added to your mortgage, this will have been discussed in our initial conversation with you. Should you choose to add your broker fee to your mortgage, you should be aware you will pay interest on the amount over the term of the mortgage, which could be significantly more than the initial fee.

Second Charge Mortgages

Your initial consultation is obligation free. Once we have established we can help you and you have decided to proceed, a non-refundable application fee of $\pounds195.00$ is payable.

On completion of your Second Charge Mortgage we will charge a broker fee of 8% of the total loan value, attracting a minimum charge of £995.00 up to a maximum charge of £3,995.00. Fees may vary depending on your circumstance and loan amount. Your mortgage advisor will discuss this fee with you prior to you signing our client agreement and before you make a mortgage application. We will usually receive a procuration fee from the lender, this amount is usually calculated as a percentage of the loan amount but varies from lender to lender, the exact amount will be confirmed on your key facts illustration and your mortgage offer.

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An illustrative example of a Second Charge Mortgage would be if you took out a £20,000 loan, our broker completion fee would be £1600 payable on completion of your mortgage. In some cases our broker fee can be added to your mortgage, this will have been discussed in our initial conversation with you. Should you choose to add your broker fee to your mortgage, you should be aware you will pay interest on the amount over the term of the mortgage, which could be significantly more than the initial fee.

Refund of fees - Mortgages/Second Charge Mortgages

If we charge you a broker fee, and your mortgage does not complete, you will receive a refund of the full broker fee. The initial application fee of £195.00 is non refundable.

How can I cancel my mortgage?

If you would like to cancel your contract with us, you have the right to cancel our Agreement within 14 days. The cancellation period expires after 14 days from the day you signed our Agreement. Please let us know by post at Your Mortgage People, Fair Trade House, 3 Whittle Avenue, Fareham, Hampshire, PO155SH, by email to ymp. mortgageadmin@yourmortgagepeople.co.uk, or by using the 'Contact Us' option on the website.

If you want to withdraw from your mortgage after this time, please contact us using the same methods outlined above, however please be aware that any costs you have paid at

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How can I cancel my life insurance policy?

Should you want to cancel any policies written by Your Protection People Ltd, you will need to speak directly with the policy provider. Your Protection People can only cancel policies if it has not started, or an imminent start date provided. Please contact <u>ypp.lifeadmin@yourprotectionpeople.co.uk</u> for further information, we will be happy to direct your query to the right place.

5. Who regulates us?

Your Mortgage People Ltd, T/A Your Mortgage People/ Your Protection People, Fair Trade House, 3 Whittle Avenue, Fareham, Hampshire, PO15 5SH is authorised and regulated by the Financial Conduct Authority (FCA). Our Financial Services Register number is 685250.

Our permitted business is advising on and arranging regulated mortgage contracts and arranging non-investment insurance contracts.

Services Financial this You check on the can by visiting FCA's website Register the www.fca.org.uk/firms/financial-services-register by or contacting the FCA on 0800 111 6768.



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6. What to do if you have a complaint

If you wish to register a complaint, please contact us:

... in writing

Your Mortgage People Ltd, T/A Your Mortgage People/ Your Protection People, Fair Trade House, 3 Whittle Avenue, Fareham, Hampshire, PO15 5SH

... by email <u>customerservices@yourmortgagepeople.co.uk</u>

... by phone 01489 346624

If you cannot settle your complaint with us, you may be entitled to refer it to the Financial Ombudsman Service (FOS).

7. <u>Are we covered by the Financial Services Compensation</u> <u>Scheme (FSCS)?</u>

We are covered by the FSCS. You may be entitled to compensation from the scheme if we cannot meet our obligations. This depends on the type of business and the circumstances of the claim.

Insurance

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And/or

For Compulsory classes of insurance, advising and arranging is covered for 100% of the claim, without any upper limit.

Mortgages

Advising and arranging is covered up to a maximum limit of $\pounds 85,000$.

Further information about compensation scheme arrangements is available from the FSCS.

8. Additional Support

Help with Debt

Where your primary reason to remortgage or take a second charge mortgage is to consolidate outstanding debt, you may wish to review the information available on alternative methods to manage your debt and the cost of living, available on the following website: <u>https://www.gov.uk/options-for-paying-off-your-debts.</u> Further sources are available here: <u>https://www.yourmortgagepeople.co.uk/about/customer-support-page/</u>

Gambling

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If your debt has arisen from out-of-control gambling which you need help managing, we recommend you refer to the NHS website for help: <u>https://www.nhs.uk/live-well/addiction-</u> <u>support/gambling-addiction</u>. Further information is also available here: <u>https://www.yourmortgagepeople.co.uk/</u> <u>about/customer-support-page/</u>

Vulnerable Customers

We are trained to identify and provide additional support to customers experiencing possible vulnerability. For more information visit: <u>https://www.yourmortgagepeople.co.uk/</u> <u>about/customer-support-page/</u>

Do I need independent Legal Advice?

In the vast majority of cases independent legal advice is not neccessary. However, we review each client and if they are in a scenario where we believe independent legal advice is needed, we will support them in gaining access to a trusted 3rd party. Additional fees may apply.

9. <u>Privacy</u>

Privacy Policy

We are Your Mortgage People/Your Protection People. These are trading names we use for our company which is called Your Mortgage People Ltd.

Your Mortgage People/Your Protection People

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that you care information how know about VOU shared and we appreciate used and your trust is do that carefully and sensibly. notice to This in US the privacy policy of Your Mortaaae sets out People/Your Protection People and describes how we will use, and look after, the personal information that you provide to us. By visiting our website, www. yourmortgagepeople.co.uk or www.yourprotectionpeople. co.uk, or agreeing to work with us you are accepting and consenting to the practices described in this Privacy Notice.

YOUR PERSONAL DATA

Personal data relates to an individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the possession of Your Mortgage People/Your Protection People or information likely to enter our possession. The processing of personal data is governed by the General Data Protection Regulation (GDPR).

We value your privacy in respect of all the personal information you give to us by any means. We will treat any and all information received confidentially; your information will not be shared outside Your Mortgage People Ltd and associated group of companies unless:

- The law requires us to do so.
- It is necessary to share the information to comply with a regulatory or legal process.

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- You have given verbal or written consent.
- It is necessary for the performance of a contract.
- It is necessary to protect your vital interests or the vital interests of another person.
- It is necessary for the performance of a task carried out in the public interest.
- It is necessary for the purposes of the legitimate interests pursued by us or a third party unless such interests are overridden by your interests or fundamental rights and freedoms under data protection law.

We do not guarantee that any emails sent to us by you will be received safely. Please contact us via telephone on 01489 346624 if you are in any doubt or wish to check the status of an email sent to us.

We do not guarantee that emails sent by us to you will be secure although we will take appropriate technical and organisational measures to try and ensure that your personal data is processed safely and securely in accordance with our obligations under the GDPR. Our Data Protection Officer is Scott Harris – <u>scott.harris@yourmortgagepeople.co.uk</u>.

WHO ARE YOUR MORTGAGE PEOPLE/YOUR PROTECTION PEOPLE?

We are a company registered in England and Wales. Our company registration number is 08503153 and our registered office is Fair Trade House, 3 Whittle Avenue, Fareham, Hampshire, PO15 5SH. We are regulated by the Financial

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Conduct Authority to provide regulated products and services. Our reference number is 685250. Our ICO reference is ZA474879.

WHAT INFORMATION DO WE GATHER?

To facilitate ourservices, we will need to gather certain personal information from you when you contact or interact with us. We will also use this information for security, identification and verification purposes. We will only ever collect information that helps us provide our services to you. We will keep your information for as long as is needed and only for the following purposes:

- Legitimate business activities
- Statutory or legal obligations
- Auditing and regulatory purposes

When you make an enquiry with us about any of the services we offer, either directly or through a third party, we'll ask you to provide some initial information. This may include some or all of the following:

- Full name
- Previous names
- Current home address
- Previous residential addresses
- Date of birth
- Landline and mobile phone number
- Email address

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If you give personal information about someone else (such as a joint applicant), you must have their permission to do so.

Some of the services we offer, such as insurance advice, requires us to collect and process information that is "sensitive". This type of information can include details about your health and any criminal convictions you have. This information will always be stored securely.

Throughout the course of your relationship with us, we will hold your personal information securely in our systems. This will include any information provided by you in various ways, including, but not limited to:

• In applications, emails and letters, during telephone calls, when registering for services, in customer surveys, when you participate in competitions and promotions, when using our website, and during fact find reviews and interviews.

• From analysis (including the creation of profiles used to uniquely identify you when you use our online, mobile and telephony services) which are used to help us combat fraud and other illegal activity; and

• Informationwereceivefromorthroughotherorganisations, such as, credit reference agencies, mortgage lenders, insurance companies, comparison websites, social networks, and fraud prevention agencies, whether in the course of providing products and services to you or otherwise, and

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from information we gather from your use of and interaction with our website and the devices you use to access them.

If there is a change to any of your personal information and you notify us, we will update your records in our systems. Where we have introduced you to another third party, we are unable to update your details with them and you will need to contact them directly to notify them of these changes. We perform anti-fraud, credit and security checks using your details and receive information about you from other sources, such as credit reference agencies, which will be added to

the personal information which we already hold about you.

LEGITIMATE INTERESTS

Under UKGDPR, organisations can use personal information where the benefits of doing so are not outweighed by the interests, fundamental rights, or freedoms of individuals. The legislation calls this the "Legitimate Interests" basis for processing personal data.

The types of benefit that we are likely to rely on this basis for processing personal data are outlined below:

• Complying with legal and regulatory requirements – We must comply with our legal and regulatory requirements. We are primarily regulated by the Financial Conduct Authority, and we may be required to provide information to them, or other regulatory bodies, as part of our regulatory or legal



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responsibilities.

• Ongoing service – When the product or service that we have recommended to you expires or is due for renewal, we will contact you to notify you of this so we can start exploring the options available to you.

• Training our staff – To offer the best possible standards of service, we use the information we collect to train our staff so they can assist our customers better.

• Marketing services – We will process your personal data in order to inform you of other similar products and services provided by us and our partners.

• Reporting and analytical purposes – We process personal information to help us analyse the service we are providing and the outcomes our customers are receiving, this is done to ways to improve these services.

• Tracking activity – We monitor how people use our website or get in touch with us so that we can identify ways to improve the ease of accessing out services.

• Maintaining our records and other administrative purposes – We will process personal information in order to ensure that the data we hold is up to date and accurate.

• Investigating and resolving complaints – If you have a reason to make a complaint, we will use your information to assess your points of complaint and address them appropriately.

• Email tracking – Not all of our email communications use email tracking but some do, this helps us to improve our communications to our customers.

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• Invitations to take part in market research – We aim to continuously improve our services and sometimes we need feedback from our clients to achieve this, we may ask you to participate in market research to achieve this. It's entirely up to you whether you chose to do so.

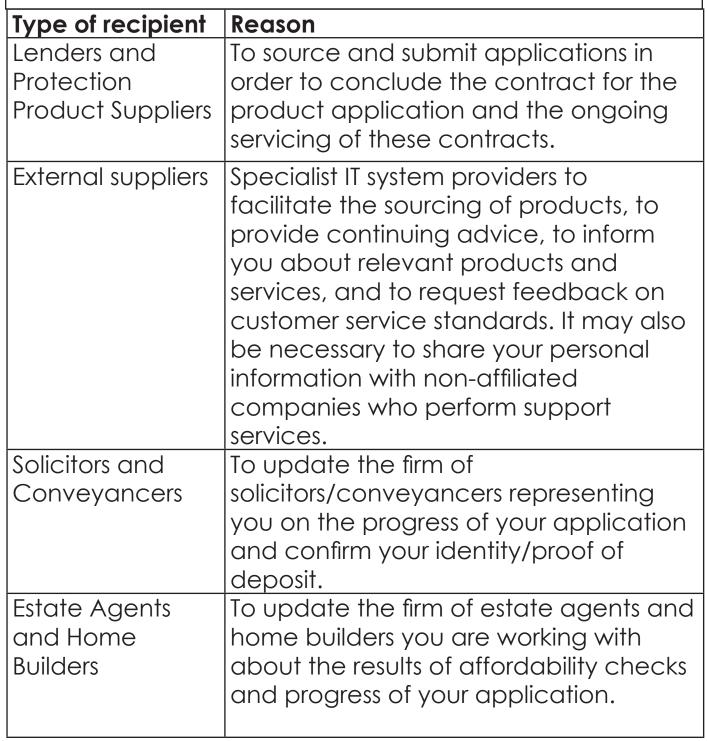
• Payment processing – We will process your personal data in order to process payments for our services when appropriate.

HOW DO WE PROCESS PERSONAL DATA & HOW WILL IT BE USED? At times, we may need to share your data with service providers outside of the UK & EU for processing to enable us to provide the best service to you. This may happen in situations such as when we make use of cloud computing systems or enlist service providers to support our quality of service for you. If we need to transfer your personal information to another organisation for processing in countries that aren't listed as 'adequate' by the European Commission, we'll only do so if we have appropriate safeguards in place. You have a right to object to your data leaving the UK & EU, if you'd like to do so please contact us as outlined below.

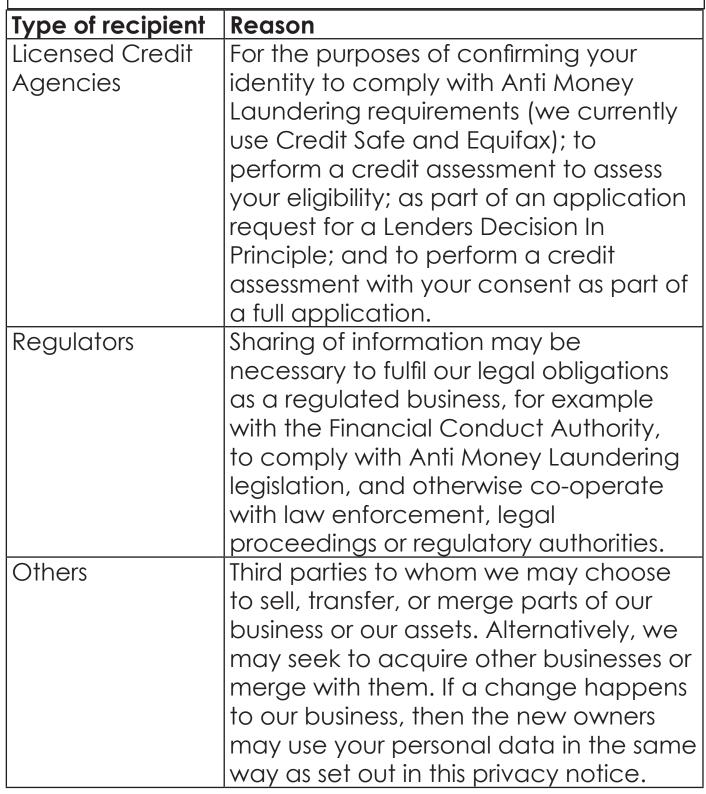
You can choose to change the medium of communication you receive from Your Mortgage People/Your Protection People e.g. letter, email, SMS, phone and opt out of Marketing for any or all products and services at any time by emailing <u>marketing@yourmortgagepeople.co.uk</u> or calling 01489 346624.

WHO WILL USE YOUR PERSONAL DATA

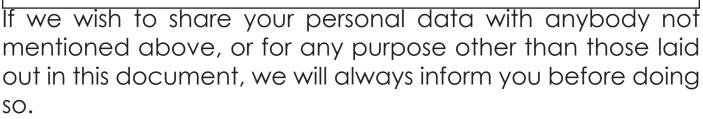
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AUTOMATED DECISION-MAKING

Sometimes it is necessary for us to approach a lender to obtain a Decision in Principle (DIP). To obtain a DIP we will process your personal information through a lender's automated decision-making system which will provide an initial lending decision based on logic and algorithms programmed into it by the lender. Whilst we do not determine the logic or algorithms used in the automated decision system, we can put you in touch with the respective lender should you require it. We will always gain your consent before completing a DIP.

HOW SECURE IS INFORMATION ABOUT ME?

We work hard to protect your information; we have secure in house servers and encourage high levels of compliance across our businesses. Our data storage systems include a protected backup solution to ensure the safety and integrity of your personal information.

Payments made using Trust Payments to Your Mortgage People/Your Protection People are encrypted using 128 bit SSL encryption but once on their systems, all sensitive data is secured using the same internationally recognised 256-bit encryption standards.



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We use a SolutionBuilder sourcing portal for life insurance. The servers are secure to industry standard and they use internationally recognised data encryption on their client portal. SolutionBuilder are also independently assessed and have the ISO 27001 accreditation.

YOUR RIGHTS & YOUR PERSONAL DATA

Unless subject to an exemption [under the GDPR], you have the following rights with respect to your personal data:

- The right to request a copy of your personal data that Your Mortgage People/Your Protection People holds about you.
- The right to request that Your Mortgage People/Your Protection People corrects any personal data if it is found to be inaccurate or out of date.
- The right to request your personal data is erased where it is no longer necessary for Your Mortgage People/Your Protection People to retain such data.
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing.
- The right to data portability.
- The right to object to any automated individual decision making.
- The right to object to the processing of your personal data.
- The right to lodge a complaint with the Information Commissioner's Office (ICO).

CREDIT SEARCHES

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In order to find the most suitable product for you our lenders may use the information held at credit reference agencies (CRAs). How our lenders and the CRAs will use your information is detailed in the section of the terms and conditions called 'use of personal information'. By confirming your agreement to proceed you are confirming that we may use your personal information in this way.

Use of personal information

Our lenders will search a CRA who will provide them with publicly held data including the electoral roll and shared credit performance data. If you have a financial associate their data may also be provided.

We will use the information provided by a CRA to help decide which products may be best for you. It is important to note that there may be other products available from lenders who are not represented by this service. When the CRA receives a search they will place a quotation search footprint, also known as a 'hard search', on your credit report, whether or not you decide to apply for the product. **Please note, this search may affect your ability to gain credit**.

The information which we provide to the CRA may be supplied by them to other organisations and used by those organisations for the purposes of checking identity, preventing fraud, tracing and collection of debt. The CRA may also use

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the data to undertake statistical analysis.

If you choose to apply for a product, lenders will undertake a further credit check and provide you with the terms and conditions for the product.

You can contact the CRAs as follows. They will charge you a small statutory fee if you wish to obtain a copy of your credit report:

• Experian

Consumer Help Service, PO Box 8000, Nottingham, NG80 7WF 0844 4818000

www.experian.co.uk

TransUnion
One Park Lane, Leeds, West Yorkshire, LS3 1EP
0330 024 7574
www.transunion.co.uk

• Equifax PLC Credit File Advice Centre, PO Box 3001, Bradford, BD1 5US 0870 010 0583

www.equifax.co.uk

Information Commissioner's Office (ICO)

If you have a complaint regarding the way that we have handled your personal data, please contact us using the details below so that we can investigate your complaint:

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Post: Your Mortgage People/Your Protection People, Fair Trade House, 3 Whittle Avenue, Fareham, Hampshire, PO15 5SH

Phone: 01489 346624

Email: scott.harris@yourmortgagepeople.co.uk

Once we have investigated your complaint, if you are still not satisfied with the outcome, you have the right to complain directly to the Information Commissioner's Office at the address below. It is not necessary for you to complain directly to us before complaining to the Information Commissioner's Office.

Information Commissioner's Office Wycliffe House Water Lane Wilmslow, Cheshire SK9 5AF 0303 123 1113 Email via online form at <u>www.ico.org.uk</u>

For further information about your rights and about how to complain, you can visit the ICO's website at <u>www.ico.org.uk</u>.

FURTHER PROCESSING

If we wish to use your personal data for a new purpose, not covered by this Data Protection Notice, then we will provide you with a new notice explaining this new use

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prior to commencing the processing and setting out the relevant purposes, processing conditions and lawful basis upon which we intend to process the data. Where and whenever necessary, we will seek your prior consent to the new processing.

We may use any feedback you give about our services for training and marketing purposes.

All of our telephone calls are recorded, we may use these calls for training or monitoring purposes.

CO-BRANDED AND JOINT OFFERINGS

In the future we may offer co-branded products and services such as those offered by parent or affiliated companies, if you wish to opt out of this please submit a request via our contact us page on the website, calling us on 01489 346 624 or emailing marketing@yourmortgagepeople.co.uk.

TERMS AND CONDITIONS

Should you participate in any of our client offers you can find full terms and conditions on our websites:

https://www.yourprotectionpeople.co.uk/terms-andconditions/

https://www.yourmortgagepeople.co.uk/terms-andconditions/

Your Mortgage People Refer a Friend Terms and Conditions

1. Your Mortgage People Ltd t/a Your Mortgage People (YMP) will give the person who recommends someone they know (the referrer) a £100 Love2Shop voucher (there is no cash alternative) per mortgage recommendation and a £50 Love2Shop voucher per life insurancerecommendation, subject to a maximum of 25 recommendations.

2. The referrer will only be eligible to receive vouchers for recommendations if they have entered into an agreement with Your Mortgage People Ltd or any of their associated trading styles.

3. In the case of mortgage recommendations, the referrer is only entitled to a voucher if the referred enters into an agreement with YMP for YMP to act on their behalf, and successfully



completes the application process. Voucher will be issued within one month of the referrer completing this process.

4. In the case of life insurance recommendations, the referrer is only entitled to a voucher if the referred enters into a term life insurance policy agreement with YPP for YPP to act on their behalf and goes on to take out a policy through YPP. The voucher will be issued on the policy start date. This scheme excludes Over 50s plans, Accident & Health plans, General Insurance plans and Whole of Life policies.

5. If the referrer recommends someone for both a mortgage and life insurance they will be issued a voucher for whichever is due first.

6. If the referrer recommends someone who is already a customer, for an alternative product, they will not be issued a voucher.

7. The company providing the voucher may impose their own terms and conditions as to the voucher and YMP have no liability as to how those terms and conditions operate.

8. As an alternative to sending the referrer a voucher YMP will be happy topay an equivalent amount to a nominated registered charity if requested to do so by the referrer.

9. The referrer will only be eligible to receive a voucher when they recommend



someone who has given permission for their details to be passed to YMP.

10. Where someone is recommended who is not known to the referrer or is known by them but has not given permission to be contacted, YMP will not pay the referrer for the recommendation.

11. If thereferrer recommends more than one person who is not known to them or has not given permission to be contacted, YMP will withdraw the recommend a friend scheme for the referrer immediately and they will not be eligible to receive any further vouchers. In such circumstances YMP may also choose not to honour the existing recommendations made by the referrer.

12. Where the referrer has recommended someone, who is not known to them or who hasn't given permission to be contacted, they may be considered to be operating an unauthorised business which is an offence under the Financial Services and Markets Act 2000.

13. YMP reserves the right to withhold payment of the vouchers for a recommendation where the referrer is outside of payment terms.

14. YMP will not accept recommendations through this scheme if the referrer is a business. Recommendations are only accepted from individuals who are not in business. However, if you are



operating a business, please contact us as we may be able to enter a different agreement with you.

15. In the event that recommendation a is duplicated by two referrers, YMP will pay vouchers to the referrer who made the recommendation first. In the event that this is impossible to verify, the vouchers will be split equally between the referrers.

16. YMP reserves the right to withdraw the recommend a friend scheme at any time and without notice. In such circumstances, all recommendations notified to YMP at the point of withdrawal of the scheme would be honoured but the referrer would not be entitled to receive a voucher for any recommendations after that point.

17. Referred customers are to be aware that the payment of referral vouchers may indicate to a referrer that you have taken out, or continue to hold, a relevant product. We will not discuss your personal information with the referrer unless you have given us express permission to do so.

18. Our referral scheme works to a maximum of 25 recommendations per customer. Though you are more than welcome to continue to recommend us to your friends, you will not be eligible to receive vouchers for referrals beyond this point.





YOUR MORTGAGE PEOPLE