



UK GDPR & Data Protection Policy

1. Introduction

Blue Sky Financial Group Ltd (“the Company”, “we”, “us”, “our”) is committed to protecting the personal data of our clients, staff, introducers, and website users. We comply with all applicable UK data protection legislation, including:

- **UK General Data Protection Regulation (UK GDPR)**
- **Data Protection Act 2018**
- **Privacy and Electronic Communications Regulations (PECR)**

This policy explains how we meet our legal obligations and protect personal data.

2. Company Details (Data Controller)

Company Name: Blue Sky Financial Group Ltd

Registered Address: 108 Beckenham Road, Beckenham, BR3 4RH

FCA Registration Number: 827075

Data Controller Email: GDPR@blueskymortgages.co.uk

The Company is the **Data Controller** for all personal data it processes.

3. What Is Personal Data?

Personal data means any information that can identify a living individual, including:

- Name, address, contact details
- Date of birth and National Insurance number
- Financial and employment information
- Identification documents
- IP address and online identifiers

Special category data (such as health information) is processed only where strictly necessary and with appropriate safeguards.

4. Data Protection Principles

We process personal data in line with the **seven UK GDPR principles**:

1. **Lawfulness, fairness & transparency**
2. **Purpose limitation**
3. **Data minimisation**
4. **Accuracy**
5. **Storage limitation**
6. **Integrity & confidentiality (security)**
7. **Accountability**

5. Lawful Bases for Processing

We only process personal data where at least one lawful basis applies:

- **Consent** – where freely given
- **Contract** – to provide mortgage or insurance services
- **Legal obligation** – FCA, AML, HMRC
- **Legitimate interests** – business operations, fraud prevention
- **Vital interests** – safeguarding in rare circumstances

6. How We Collect Personal Data

We collect data through:

- Website enquiry forms
- Telephone calls and emails
- Fact finds and client forms
- Mortgage and insurance applications
- Identity verification systems
- Cookies and website analytics

7. How We Use Personal Data

We use personal data to:

- Provide mortgage and protection advice
- Process applications with lenders and insurers
- Carry out affordability and suitability assessments
- Verify identity and prevent financial crime
- Communicate with clients

- Meet FCA Consumer Duty requirements
- Comply with legal and regulatory obligations

8. Special Category Data

Where required (e.g. for protection or insurance advice), we may process:

- Health information

This data is:

- Processed only with **explicit consent**
- Strictly limited in access
- Subject to enhanced security controls

9. Data Sharing & Third Parties

We may share personal data with:

- Mortgage lenders and insurers
- Solicitors, surveyors and conveyancers
- Credit reference agencies (Experian, Equifax, TransUnion)
- Identity verification & AML providers
- Compliance service providers
- Regulators, law enforcement and HMRC

We never sell personal data.

10. International Data Transfers

Personal data is stored in the UK. Where data is transferred internationally, we ensure:

- UK adequacy decisions apply, or
- Standard Contractual Clauses (SCCs) are in place

11. Data Security Measures

We protect personal data using:

- Encrypted systems and secure servers

- Password-protected access
- Role-based access controls
- Staff training on GDPR
- Regular audits and monitoring
- Secure document storage and destruction

12. Data Retention

We retain personal data only for as long as necessary:

- **Client records:** Minimum **5–7 years** (FCA requirement)
- **Marketing data:** Until consent is withdrawn
- **Financial crime records:** As required by law

Data is securely destroyed once retention periods expire.

13. Individual Rights Under UK GDPR

Individuals have the right to:

- Access their personal data
- Rectify inaccurate data
- Erase data (where legally allowed)
- Restrict processing
- Data portability
- Object to processing
- Withdraw consent at any time

All requests must be sent to:

 GDPR@blueskymortgages.co.uk

Requests will be responded to within **30 days**.

14. Marketing & PECR Compliance

Marketing communications are sent only where:

- Explicit consent has been given, or
- A legitimate interest applies under PECR

All marketing communications include a clear **opt-out option**.

15. Data Breach Procedure

Any personal data breach will:

- Be recorded internally
- Be reported to the **ICO within 72 hours** (where required)
- Be communicated to affected individuals where there is a high risk
- Be fully investigated with corrective action taken

16. Staff Responsibilities

All staff at Blue Sky Financial Group Ltd must:

- Follow this GDPR Policy
- Complete GDPR training
- Keep personal data confidential
- Report data breaches immediately
- Only access data required for their role

Failure to comply may result in disciplinary action.

17. Complaints

If a data subject is unhappy with how their data is handled, they may contact:

Information Commissioner's Office (ICO)

Website: ico.org.uk

Telephone: 0303 123 1113

18. Policy Review

This GDPR Policy is reviewed **annually** or sooner if legislation or business practices change.

This GDPR Policy Fully Covers:

- ✓ UK GDPR
- ✓ Data Protection Act 2018

- ✓ PECR
- ✓ FCA Consumer Duty
- ✓ AML & Financial Crime Controls
- ✓ Website, client & internal data