

Claire Rogers Financial - Privacy Policy

Privacy Policy

Claire Rogers Financial

Authorised and regulated by the Financial Conduct Authority

FCA Firm Reference Number: 924335

Head Office: 63B Severn Road, Weston-super-Mare, Somerset, BS23 1DR (serving clients across the South West and nationwide)

Date Updated: August 2026

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Important Commitment

Claire Rogers Financial ("we", "us", "our") is committed to protecting your privacy and processing your personal data in a responsible, transparent, and lawful manner.

This Privacy Policy explains how we collect, use, disclose, store, and protect your personal data in connection with our mortgage broking and related services.

It is provided to you alongside our Terms of Business. By continuing to engage our services after receiving it — including by providing information, attending appointments, or submitting applications — you acknowledge that you have been given this policy and have had the opportunity to read it, and you accept our Terms of Business, of which this policy forms part.

Related Documents

This Privacy Policy should be read in conjunction with our Terms of Business and Complaints Procedure.

- Terms of Business: <https://crfinancial.co.uk/terms-of-business/>
- Complaints Procedure: <https://crfinancial.co.uk/complaints/>

1. Who We Are

Claire Rogers Financial provides independent mortgage advice and arrangement services, protection insurance, and associated support on a whole-of-market basis.

- We are authorised and regulated by the Financial Conduct Authority (FCA) with Firm Reference Number **924335**. You can verify our status at any time on the FCA Register: <https://register.fca.org.uk/s/>.
- We are registered with the Information Commissioner's Office (ICO) under Registration Reference **ZB660035**.
- Trading address: 63B Severn Road, Weston-super-Mare, Somerset, BS23 1DR.

We are the data controller in respect of the personal data described in this policy.

2. Acceptance and Acknowledgement of This Policy

This policy applies whenever we process your personal data — including when you contact us, attend an appointment, submit information or documents, apply for a mortgage or protection product through us, or use our website.

You are not asked to sign this policy. Once it has been provided or made available to you, your continuing engagement with us constitutes your acknowledgement and acceptance of it. Specifically, by attending or continuing an appointment, providing us with information or documents, asking us to research the market or approach a lender or insurer, submitting an application through us, or otherwise proceeding with our services, you confirm that:

- you have been provided with, or given access to, this Privacy Policy and have had a reasonable opportunity to read it;
- you understand the categories of personal data we collect, the purposes for which we process them, and the third parties with whom we will share them; and
- you accept the data processing practices described in this policy, which forms part of our Terms of Business.

This acceptance forms part of your acceptance of our Terms of Business (see Section 14 of that document). If you do not agree with any part of this policy, please tell us before proceeding.

Acceptance Is Not the Same as Consent

Most of our processing is carried out because it is necessary to perform our contract with you or to comply with our legal obligations — not because you have consented, and your acceptance of this policy does not change that.

Where we do rely on your consent for a specific activity (for example, direct marketing, or certain uses of health information for protection products), we will ask you for that consent separately and clearly at the time. You may withdraw it at any time without affecting the lawfulness of processing carried out beforehand, and without affecting the rest of our service to you.

3. Personal Data We Collect

We collect and process the following categories of personal data (as relevant to your circumstances):

- **Identity & Contact Data:** Full name, date of birth, address(es), email, telephone numbers, marital status, and National Insurance number.
- **Financial & Employment Data:** Income, employment details, expenditure, assets, liabilities, bank statements, credit history, and affordability assessments.
- **Mortgage & Property Data:** Details relating to your current and proposed mortgage, property valuation, purchase or remortgage plans.
- **Protection & Insurance Data:** Information required for life assurance, critical illness cover, income protection, and other protection products.
- **Special Category Data:** Health or medical information (where relevant to protection products or vulnerability assessments), and criminal offence data (for anti-money laundering and fraud prevention purposes).
- **Correspondence & Interaction Data:** Records of calls, emails, WhatsApp messages, meetings, notes, website usage, and complaints.
- **Technical Data:** IP address, device information, and browsing data collected via cookies and analytics tools.
- **Third Party Data:** Information received from lenders, credit reference agencies, solicitors, estate agents, or other professionals involved in your transaction.

We only process special category data where necessary and with an appropriate additional condition under Article 9 of the UK GDPR (such as explicit consent, or the substantial public interest condition applicable to insurance purposes).

4. Purposes and Legal Basis for Processing

We process your personal data on the following lawful bases:

- **Performance of a Contract** (or steps prior to entering a contract) – to provide mortgage advice, arrange products, manage applications, and deliver the services you request.
- **Legal Obligation** – to comply with FCA rules (including the Consumer Duty), anti-money laundering regulations, and other statutory requirements.

- **Legitimate Interests** – to improve our services, conduct statistical analysis, prevent fraud, maintain business records, and develop our services (always balanced against your rights and freedoms).
- **Consent** – for direct marketing and for certain uses of special category data (you may withdraw consent at any time).

Essential Data Sharing

To progress your mortgage and protection objectives, we must share your personal data with third parties such as lenders, insurers, solicitors and credit reference agencies. This sharing is necessary for the performance of our contract with you and to comply with our legal obligations; it is not based on consent, and we will not ask you to re-authorise each individual disclosure.

By engaging our services you acknowledge and accept that this sharing will take place, and that we will not seek your further input on each individual occasion, as doing so would prevent us from progressing your application efficiently.

We take reasonable steps to ensure that any parties with whom we share your data are appropriately regulated by the FCA, registered with the ICO where required, or maintain robust privacy and data protection standards equivalent to our own. If you object to a specific disclosure, please tell us — but be aware that we may then be unable to progress your application.

5. Sharing Your Personal Data

We may disclose your personal data to the following recipients where necessary:

- Lenders, banks, and specialist mortgage providers on our panel.
- Protection product providers and insurers, including Assurant for buildings and contents insurance.
- Credit reference agencies and fraud prevention services, including our credit report partner CheckMyFile.
- Solicitors and conveyancers, introduced through our conveyancing referral partner Sort Refer.
- Regulatory bodies (FCA, ICO) and law enforcement where legally required.
- Service providers (secure client portals, IT systems, document processors, payment services).
- Professional advisers and auditors.

All third-party recipients are subject to contractual obligations to keep your data secure and to process it only for the purposes we instruct.

We do not sell your personal data.

6. International Data Transfers

Your data is primarily stored and processed in the UK. Where transfers outside the UK are necessary, we ensure adequate safeguards are in place, including UK International Data Transfer Agreements, the UK Addendum to the EU Standard Contractual Clauses, or equivalent mechanisms.

7. Data Security

We maintain appropriate technical and organisational security measures (including encryption, access controls, secure portals, training, and regular review) to protect your personal data against unauthorised access, loss, or misuse.

We also maintain Professional Indemnity Insurance as required by the FCA.

8. Retention of Your Personal Data

We will retain your personal data for as long as necessary to fulfil the purposes outlined in this policy and to satisfy our legal and regulatory obligations.

- For mortgage-related records this is typically at least 6 years from the end of our relationship with you (or longer if required by law, ongoing complaints, or potential legal claims).
- After this period, we will securely delete or anonymise your data.

9. Your Rights

You have the following rights under the UK GDPR (subject to applicable exemptions):

- Right to access a copy of your personal data.
- Right to rectification of inaccurate or incomplete data.
- Right to erasure ("right to be forgotten").
- Right to restrict processing.
- Right to object to processing (including for direct marketing or legitimate interest purposes).
- Right to data portability.
- Rights relating to automated decision-making (we do not currently carry out solely automated decisions with significant effects).
- Right to withdraw consent (where applicable).

To exercise any of these rights, please contact us using the details below. We will respond within one month; this may be extended by up to two further months for complex or numerous requests, in which case we will tell you within the first month. We may require proof of identity. Requests are free of charge, although we may charge a reasonable fee, or refuse to act, where a request is manifestly unfounded or excessive.

10. Cookies and Website

Our website uses cookies and similar technologies. Strictly necessary cookies are used to make the site function and to keep it secure. Any non-essential cookies, including those used for analytics or performance measurement, are only set with your permission, which you may give or decline when you first visit the site and may change at any time through your browser settings.

Browsing data collected in this way is processed on the basis of our legitimate interest in operating and improving our website, and is not used to make decisions about you or your application.

11. Contacting Us

For any queries regarding this Privacy Policy or to exercise your rights:

Data Protection Contact

Email: info@crfinancial.co.uk (please mark clearly as "Data Protection" or "Subject Access Request")

Telephone: 07792 390 187

Post: Claire Rogers Financial, 63B Severn Road, Weston-super-Mare, Somerset, BS23 1DR

12. Complaints about Data Protection

If you are unhappy with how we have handled your personal data, please contact us first. You also have the right to lodge a complaint with the Information Commissioner's Office (ICO):

- Online: <https://ico.org.uk/make-a-complaint/>
- Telephone: 0303 123 1113

13. Updates to This Policy

We may update this Privacy Policy from time to time to reflect changes in our practices or legal requirements. The current version will always be available on our website. Material changes will be notified to you directly where appropriate.

By continuing to engage with Claire Rogers Financial after an updated policy has been published or notified, you acknowledge and accept the practices described in the current version.

Claire Rogers Financial | FCA Firm Reference Number: 924335 | ICO Registration: ZB660035

This policy was last updated in August 2026.