Privacy Notice

Sturley Mortgages Limited

This notice explains how we collect, use, share and retain personal information when you enquire about our services, receive advice, make an application, are introduced to another firm, or otherwise deal with us.

Controller	Sturley Mortgages Limited
Company and regulator	Company number 06026729 | FCA Firm Reference Number 463639
Contact	Garry Sturley | garry@sturleymortgages.com | 01625 836818
Version and effective date	Version 1.0 | Effective date: 16 September 2026

1. Who we are

Sturley Mortgages is the everyday business name used by Sturley Mortgages Limited. Sturley Mortgages Limited is registered in England and Wales under company number 06026729 and is authorised and regulated by the Financial Conduct Authority under Firm Reference Number 463639. We are the controller of the personal information covered by this notice.

Our registered office is 33 Markham Street, York, England, YO31 8NR. Privacy enquiries and rights requests should be sent to Garry Sturley at garry@sturleymortgages.com or made by telephone on 01625 836818.

2. The information we collect

Depending on the service and your circumstances, we may collect:

- identity and contact information, including your name, address, date of birth, telephone number and email address;
- family, household, dependant and representative information relevant to the advice;
- employment, income, expenditure, assets, liabilities, credit history, tax status and other financial information;
- property, mortgage, deposit, source-of-funds, residency and identification information;
- your needs, objectives, preferences, decisions and the reasons for them;
- communications, appointment information, case notes, documents supplied and records of advice;
- application, lender, product, valuation, offer, completion and outcome information; and
- information relevant to fraud prevention, financial crime, complaints, service errors and legal or regulatory enquiries.

Health, vulnerability and other sensitive information

We may need limited information about health, disability, accessibility, communication needs or other vulnerability where it is relevant to providing suitable advice, arranging appropriate support or meeting our legal and regulatory responsibilities. We will only collect what is relevant and proportionate.

3. Where the information comes from

We normally obtain information directly from you. We may also receive it from:

- a joint applicant, authorised representative, attorney, introducer or referrer;
- lenders, product providers and firms to which we make an agreed referral;
- identity-verification, credit-reference and fraud-prevention services;
- public registers and publicly available sources; and
- our mortgage club or network services, compliance advisers, insurers and professional advisers.

If you give us information about another person, please make sure you are entitled to do so and, where appropriate, show them this notice.

4. How and why we use the information

We use personal information only where we have a lawful basis. The bases most relevant to our work are set out below.

Lawful basis	Main uses
Contract or steps before a contract	Responding to enquiries; understanding your needs; researching and giving advice; obtaining decisions in principle; submitting, progressing and administering applications; communicating with you; and providing any agreed mortgage or protection service.
Legal obligation	Meeting regulatory and record-keeping duties; checking identity; preventing and reporting financial crime; handling complaints and rights requests; responding to regulators, courts or law-enforcement bodies; and keeping evidence of the service provided.
Legitimate interests	Operating and protecting the business; maintaining accurate records; improving service quality; managing referrals and providers; preventing fraud and misuse; establishing, exercising or defending legal claims; and supporting business continuity. We consider and balance these interests against your rights.
Consent	Used where consent is the appropriate legal basis, including certain uses of sensitive information or electronic marketing. You may withdraw consent at any time, without affecting processing already carried out lawfully.

Special-category information

Health information and some vulnerability information may be special-category data. In addition to a lawful basis above, we will normally rely on your explicit consent where appropriate, or another condition permitted by data-protection law, such as where processing is necessary to establish, exercise or defend legal claims. We will record the applicable condition where this information is used.

5. Who we share information with

Where relevant and proportionate, we may share information with:

- mortgage lenders and protection providers;
- third-party brokers or referral partners for services such as bridging finance, second-charge mortgages or protection, where the referral has been explained and agreed;
- introducers or representatives, but only where disclosure is necessary and authorised;
- mortgage clubs, compliance consultants, auditors, professional-indemnity insurers, solicitors, accountants and other professional advisers;
- providers of sourcing, identity-checking, fraud-prevention, communications, document, IT, cloud-storage, backup and security services;
- credit-reference agencies and fraud-prevention agencies, where appropriate; and
- the Financial Conduct Authority, Financial Ombudsman Service, Information Commissioner's Office, law-enforcement bodies, courts and other authorities where required or justified.

We do not sell your personal information. Organisations such as lenders, providers and credit-reference agencies may act as separate controllers and will provide or publish their own privacy information.

6. International transfers

Some technology or service providers may process information outside the United Kingdom. Where this involves a restricted international transfer, we will use a lawful transfer mechanism, such as UK adequacy regulations or approved contractual safeguards, unless a permitted exception applies. You may contact us for further information about the safeguards relevant to your information.

7. How long we keep information

We normally keep a completed client file for at least six years after completion or the end of the relevant client relationship. We may keep information longer where this is reasonably required by law, regulation, a lender or mortgage-club requirement, our insurer, or to deal with a complaint, investigation or legal claim.

Information about an enquiry that does not proceed is kept only for as long as reasonably needed for follow-up, regulatory evidence, fraud prevention or the defence of claims. Retention is reviewed, and information that is no longer required is securely deleted or anonymised.

8. Security

We use proportionate organisational and technical measures to protect personal information against loss, misuse, unauthorised access, alteration and disclosure. Access is limited to people and service providers who need it for an authorised purpose and who are subject to appropriate duties of confidentiality and security.

9. Your data-protection rights

Depending on the circumstances and the lawful basis used, you may have the right to:

- ask for access to your personal information and a copy of it;
- ask us to correct inaccurate or incomplete information;
- ask us to erase information or restrict how it is used;
- object to certain processing;
- receive information you provided in a portable format, or ask us to transfer it; and
- withdraw consent where consent is the basis for processing.

These rights are not absolute and do not all apply in every case. We may need to verify your identity before acting on a request. We will explain any lawful reason why a request cannot be met in full.

YOUR RIGHT TO OBJECT

You may object to processing based on legitimate interests. We will stop unless we can demonstrate compelling legitimate grounds that override your interests, rights and freedoms, or the processing is needed to establish, exercise or defend legal claims.

10. Automated decision-making

We do not make decisions about you based solely on automated processing where the decision would have a legal or similarly significant effect. A lender, provider, credit-reference agency or fraud-prevention agency may use automated processes under its own procedures; its privacy information should explain this and any rights that apply.

11. If information is not provided

You are not generally required by law to give us personal information. However, if information needed to assess your circumstances, provide suitable advice, submit an application or meet legal and regulatory duties is not provided, we may be unable to provide the service or continue with an application.

12. Website information, cookies and marketing

When you use our website, basic technical information such as your IP address, browser or device information and security or usage logs may be processed by website hosting and security providers. This supports the operation and protection of the website on the basis of legitimate interests. Where consent is legally required for non-essential cookies, it will be requested. You can also manage cookies through your browser settings.

We do not currently use client information for general direct marketing. If this changes, we will meet the applicable consent and privacy requirements and provide a clear way to opt out.

13. Questions and complaints

Please contact Garry Sturley first if you have a question, wish to exercise a right or have a concern about how your information has been handled. We will investigate data-protection complaints fairly and respond without undue delay.

If you remain dissatisfied, you may complain to the Information Commissioner's Office (ICO):

- Website: www.ico.org.uk/make-a-complaint
- Helpline: 0303 123 1113
- Post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

14. Changes to this notice

We may update this notice when our services, systems or legal obligations change. The current approved version will show its effective date. Where a change is material, we will take reasonable steps to bring it to the attention of affected clients.