



YOUR INSURANCE
PEOPLE

Combined Initial
Disclosure Document

Your Insurance People

2 Gloster Court, Whittle Avenue, Fareham, Hampshire, PO15 5SH

E: hello@yourinsurancepeople.co.uk



Hello,

Thank you for your interest in **Your Insurance People**. We are a team of independent Insurance Brokers, on hand to provide you with expert advice that helps you find an insurance policy to fit both your needs and your budget.

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 Insurance People are:

- ☀ **Authorised by the Financial Conduct Authority** to offer a range of insurance products
- ☀ **Independent brokers who search a range of providers** looking through hundreds of policies to get you the best deal
- ☀ **An experienced team** with years of working in the finance industry, offering invaluable insight to help you choose the best way forward

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

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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

We offer products from a range of insurers for non-investment insurance products including 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 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.

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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 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. What will you have to pay us for our services?

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 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, unless you tell us not to.

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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 £195.00 is payable.

Our typical broker fee is £695.00. However, on complex cases we may charge an increased broker fee, up to a maximum £2,495.00 payable on completion of your mortgage. We will be paid a procuration fee from the lender.

Fees may vary depending on your circumstance and loan amount. If your case is complex, we will discuss this with you prior to you signing our client agreement and before you make a mortgage application. You will receive a mortgage illustration when considering a mortgage which will tell you about any fees relating to it.

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 £195.00 is payable.

On completion of your Second Charge Mortgage we will charge a broker fee of 12% of the total loan value, attracting a minimum charge of £995.00 up to a maximum charge of £3,995.00. We will be paid a procuration fee from the lender. Your mortgage advisor will discuss this fee with you prior to you signing our client agreement and before you make a mortgage application.

An illustrative example of a Second Charge Mortgage would be if you took out a £20,000 loan, our broker completion fee would be £2,400 payable on completion of your mortgage.

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.

5. Who regulates us?

Your Mortgage People Ltd, T/A Your Insurance People, 2 Gloster Court, 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.

You can check this on the Financial Services Register by visiting the FCA's website www.fca.org.uk/firms/financial-services-register or by 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 Insurance People, 2 Gloster Court, Whittle Avenue, Fareham, Hampshire, PO15 5SH

...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. Are we covered by the Financial Services Compensation Scheme (FSCS)?

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

Insurance advising and arranging is covered for 90% of the claim, without any upper limit.

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 £85,000.

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

8. Privacy

PRIVACY POLICY

We are Your Insurance People. This is a trading name we use for our company which is called Your Mortgage People Ltd.

Your Insurance People know that you care how information about you is used and shared and we appreciate your trust in us to do that carefully and sensibly. This notice sets out the privacy policy of Your Insurance People and describes how we will use,

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and look after, the personal information that you provide to us. By visiting our website, www.yourinsurancepeople.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.
- 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 – scott.harris@yourmortgagepeople.co.uk.

WHO ARE YOUR INSURANCE PEOPLE?

We are a company registered in England and Wales. Our company registration number is 08503153 and our registered office is 2 Gloster Court, Whittle Avenue, Fareham, Hampshire, PO15 5SH. We are regulated by the Financial Conduct Authority to provide regulated products and services. Our reference number is 685250. Our ICO reference is ZA474879.

HOW DO WE PROCESS PERSONAL DATA & HOW WILL IT BE USED?

We take your privacy very seriously. We will not give your personal information to any other person or organisation outside of Your Mortgage People Ltd without your permission to do so.

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We will only use the personal information you provide us with to:

- a. Administer your account.
- b. Provide the products and services you have requested from us.
- c. Process your payment for these services.
- d. Inform you of other similar products and services provided by Your Mortgage People Ltd and our associated group of companies that we think you may be interested in.

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 Insurance People e.g. letter, email, SMS, phone and opt out of Marketing for any or all products and services at any time by emailing hello@yourinsurancepeople.co.uk or calling 01489 346624.

WHO WILL USE YOUR PERSONAL DATA

Type of recipient	Reason
Lenders and Protection Product suppliers	To source and submit applications in order to conclude the contract for the product application and the ongoing servicing of these contracts.
External suppliers	Specialist IT system providers to facilitate the sourcing of products, to provide continuing advice, to inform you about relevant products and services, and to request feedback on customer service standards. It may also be necessary to share your personal information with non-affiliated companies who perform support services.
Solicitors and Conveyancers	To update the firm of solicitors/conveyancers representing you on the progress of your application and confirm your identity/proof of deposit.
Estate Agents and Home Builders	To update the firm of estate agents and home builders you are working with about the results of affordability checks and progress of your application.

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Type of recipient	Reason
Licensed Credit Agencies	For the purposes of confirming your identity to comply with Anti Money Laundering requirements (we currently use Credit Safe and Equifax); to perform a credit assessment to assess your eligibility; as part of an application request for a Lenders Decision In Principle; and to perform a credit assessment with your consent as part of a full application.
Regulators	Sharing of information may be necessary to fulfil our legal obligations as a regulated business, for example with the Financial Conduct Authority, to comply with Anti Money Laundering legislation, and otherwise co-operate with law enforcement, legal proceedings or regulatory authorities.
Others	Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

If we wish to share your personal data with anybody not mentioned above, or for any purpose other than those laid out in this document, we will always inform you before doing so.

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 Sage Pay 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.

We use an XPLAN sourcing portal for life insurance. The servers are secure to industry standard and they use internationally recognised data encryption on their client portal. XPLAN 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:

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- The right to request a copy of your personal data that Your Insurance Protection People holds about you.
- The right to request that Your Insurance 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 Insurance 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

In order to find the most suitable product for you we may use the information held at credit reference agencies (CRAs). How we 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

We will search a CRA who will provide us 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 the data to undertake statistical analysis.

If you choose to apply for a product, we will undertake a 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

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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:

Post: Your Insurance People, 2 Gloster Court, 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 www.ico.org.uk

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

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 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.

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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-and-conditions/>

<https://www.yourmortgagepeople.co.uk/terms-and-conditions/>

<https://www.yourinsurancepeople.co.uk/terms-and-conditions/>

Your Insurance People Refer a Friend Terms & Conditions

1. Your Mortgage People Ltd t/a Your Insurance People (YIP) 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 £20 Love2Shop voucher per life insurance recommendation, 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 Your Mortgage People (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 Your Protection People (YPP) for YPP to act on their behalf and goes on to take out a policy through YPP. Voucher will be issued on policy start date. This scheme excludes Over 50s plans, Accident and health plans and General Insurance plans.

5. If the referrer recommends someone for both mortgage and life insurance services they will be issued only one voucher for the value of whichever is due first.

6. If the referrer recommends someone who is already an active customer with Your Mortgage People Ltd 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 YPP have no liability as to how those terms and conditions operate.

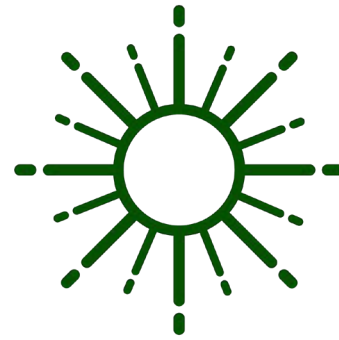
8. As an alternative to sending the referrer a voucher YPP will be happy to pay an equivalent amount to a nominated registered charity if requested to do so by the referrer.

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 YIP.

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, YIP will not pay the referrer for the recommendation.

11. If the referrer recommends more than one person who is not known to them or has not given permission to be contacted, YIP 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 YIP 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



YOUR INSURANCE PEOPLE

an unauthorised business which is an offence under the Financial Services and Markets Act 2000.

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

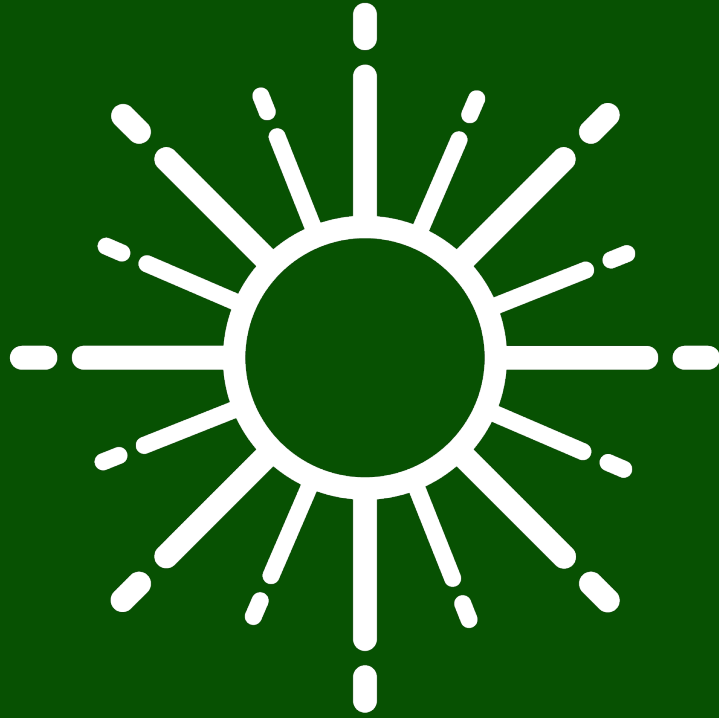
14. YIP will not accept recommendations through this scheme if the referrer is a business. Recommendations are only accepted from individuals who are not in business. However, if you are operating a business, please contact us as we may be able to enter a different agreement with you.

15. In the event that a recommendation is duplicated by two referrers, YIP 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. YIP reserves the right to withdraw the recommend a friend scheme at any time and without notice. In such circumstances, all recommendations notified to YIP 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. Your Mortgage People Ltd customers are to be aware that the payment of vouchers may indicate to the introducer that you have taken out, or continue to hold, a relevant product. We will not discuss further personal information with the introducer 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.



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