

## LEGAL BASIS FOR PROCESSING

PURPOSE OF PROCESSING	LEGAL GROUNDS	PERSONAL DATA PROCESSED
<b>Due diligence (as part of the purchase of a portfolio)</b>		
To conduct due diligence on a potential portfolio on behalf of the proposed purchaser including verification of property details and location.	Legitimate interests of HMS (to conduct due diligence on underlying shared equity mortgages and the related properties to provide commercial and financial analysis for the prospective lender.)	<ul style="list-style-type: none"> <li>• Address</li> <li>• Address property details</li> <li>• Share equity information</li> </ul>
To conducting data accuracy, data cleansing and data validation against information provided by the seller of the portfolio.	Legitimate interests of HMS (to conduct due diligence on underlying shared equity mortgages and the related properties to provide that commercial and financial analysis for the prospective lender)	<ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Address Property details</li> <li>• Share equity information</li> </ul>
<b>Servicing the shared equity mortgage or commercial real estate loan</b>		
On initiation by a lender to outsource the servicing of a shared equity mortgage or commercial real estate loan to Hampton Mortgage Servicing Limited (HMS).	Legitimate interests of HMS (to correspond with borrowers on behalf of HMS's third-party clients in order ensure the borrowers are aware of their financial obligations and service their shared equity mortgage).	<ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Email address (not in all cases)</li> <li>• Telephone number (not in all cases)</li> <li>• Share equity information</li> </ul>
General servicing of your shared equity mortgage such as sending you reminders on your date of redemption.	Legitimate interests of HMS (to correspond with borrowers on behalf of HMS's third-party clients in order ensure the borrowers are aware of their financial obligations).	<ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Email address (not in all cases)</li> <li>• Telephone number (not in all cases)</li> <li>• Share equity information</li> </ul>
The management and handling of complaints, subject access requests and other regulatory provisions.	Legitimate interests of HMS (to correspond with borrowers to manage and review any complaints, subject access requests etc that they raise and require a response from HMS on).	<ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Marital status</li> <li>• Gender</li> </ul>

		<ul style="list-style-type: none"> <li>• Email address (not in all cases)</li> <li>• Telephone number (not in all cases)</li> <li>• Share equity information</li> <li>• CRE borrower and loan information</li> </ul>
Manage general correspondence and enquiries and processing feedback from clients.	Legitimate interests of HMS (to correspond with borrowers on behalf of HMS's third-party clients in order ensure the borrowers are aware of their financial obligations).	<ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Email address</li> <li>• Marital status</li> <li>• Gender</li> <li>• Telephone number</li> <li>• Share equity information</li> <li>• CRE borrower and loan information</li> </ul>
Contacting you via other methods (such as an agent attending your property) in order to remind you of your date of redemption where no other means of communication has been successful	Legitimate interests of HMS (to correspond with borrowers on behalf of HMS's third-party clients in order ensure the borrowers are aware of their financial obligations)	<ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Email address (not in all cases)</li> <li>• Telephone number (not in all cases)</li> <li>• Share equity information</li> </ul>
Conducting tracing on an individual either internally or by using a third party.	Legitimate interests of HMS in performing the contractual duties with that third-party client.	<ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Email address (not in all cases)</li> <li>• Telephone number (not in all cases)</li> <li>• Share equity information</li> </ul>
To service your commercial real estate loan	Legitimate interests of HMS (to correspond with borrowers on behalf of HMS's third-party clients in order ensure the borrowers are adhering to the terms of the loans and are keeping up to date with payments).	<ul style="list-style-type: none"> <li>• Name (not in all cases)</li> <li>• Address (not in all cases)</li> <li>• Email address (not in all cases)</li> <li>• Telephone number (not in all cases).</li> <li>• CRE borrower and loan information</li> </ul>
Conducting ongoing monitoring of the commercial real estate borrowers, including fraud, anti-money laundering and sanctions	Compliance with a legal obligation Legitimate interest of HMS (to provide the lender with this information to assess if the borrower is still	<ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Email address</li> </ul>

checks	within an acceptable risk appetite).	<ul style="list-style-type: none"> <li>• Telephone number</li> <li>• Identification details</li> <li>• CRE borrower and loan information</li> <li>• Credit and anti-fraud data.</li> </ul>
Complying with our legal and regulatory obligations	Compliance with a legal obligation Legitimate interest of HMS (to take pre-emptive steps to ensure legal and regulatory compliance).	<ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Email address</li> <li>• Telephone number</li> <li>• Identification details</li> <li>• Financial information</li> <li>• Credit and anti-fraud data.</li> <li>• Share equity information</li> <li>• CRE borrower and loan information</li> </ul>
Transferring portfolios, company sales and reorganisations	Legitimate interests of HMS (to allow the funds and HMS to structure their business appropriately).	<ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Email address</li> <li>• Telephone number</li> <li>• Share equity information</li> <li>• CRE borrower and loan information</li> </ul>
<b>At redemption of your shared equity mortgage or as part of the management of the commercial real estate loan.</b>		
Managing the redemption process and redeem your loan	Legitimate interest of HMS (to assist the borrowers in paying back or reach an agreed solution with the lender on how to pay back the shared equity mortgage).	<ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Email address</li> <li>• Telephone number</li> <li>• Share equity information</li> </ul>
To assess your financial circumstances at the point the loan is due (the redemption date). This could be via conducting an income and	Legitimate interest of HMS: (1) to assess the borrower's financial circumstances on behalf of the lender in	<ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Email address</li> </ul>

<p>expenditure assessment over the phone or via a third party.</p>	<p>order to agree a payment solution  (2) to allow HMS to make a recommendation to the lender on the appropriate course of action with their knowledge and expertise of the UK regulatory environment.</p>	<ul style="list-style-type: none"> <li>• Telephone number</li> <li>• Share equity information</li> <li>• Financial information including income and expenditure and other financial information.</li> <li>• Identification details</li> <li>• Credit and anti-fraud data.</li> </ul>
<p>To instruct field agents, solicitors or other professional parties to act on behalf of the lender or owner to assess your financial situation/ conduct a valuation or enforce the contract.</p>	<p>Legitimate interest of HMS:  (1) to assess the borrower’s financial circumstances on behalf of the lender in order to agree a payment solution</p>	<ul style="list-style-type: none"> <li>• All categories of individual details</li> <li>• Share equity information</li> <li>• Financial information including bank account details, income and expenditure and other financial information.</li> <li>• Identification details including utility bills, bank statements, national insurance number.</li> <li>• Credit and anti-fraud data.</li> </ul>
<p>To assess your physical and mental circumstances at the point the loan is due (the redemption date) or if you are in an existing arrangement under hardship</p>	<p>Legitimate interest of HMS:  (1) to assess the borrower’s physical and mental circumstances on behalf of the lender in order to that give them the information on whether to evoke the hardship clause.  (2) to allow HMS to make a recommendation to the lender on the appropriate course of action with their knowledge and expertise of the UK regulatory environment.</p>	<ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Email address</li> <li>• Telephone number</li> <li>• Gender</li> <li>• Family details</li> <li>• Marital status</li> <li>• Share equity information</li> </ul>
	<p><u>Special Category Data</u>  The collection of health data under Article 9 the legal basis that is used is:   Consent (recorded on our telephone systems)</p>	<ul style="list-style-type: none"> <li>• Health data</li> </ul>

To communicate with any third party professional representative that you may instruct to act on your behalf or which we may have referred you to.	Legitimate interest of HMS (to ensure that we are able to communicate with your representative to understand in greater details your circumstances.)	<ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Email address</li> <li>• Telephone number</li> <li>• Gender</li> <li>• Family details</li> <li>• Marital status</li> <li>• Share equity information</li> <li>• CRE borrower and loan information</li> <li>• Credit and anti-fraud data.</li> </ul>
	<p>In cases where HMS voluntarily refers you to a third party (such as an IFA), the legal basis is:</p> <p>Consent (recorded on our telephone systems)</p>	<ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Email address</li> <li>• Telephone number</li> <li>• Gender</li> <li>• Family details</li> <li>• Marital status</li> <li>• Share equity information</li> <li>• CRE borrower and loan information</li> <li>• Credit and anti-fraud data.</li> </ul>
For statistical analysis	Legitimate interests of HMS (to allow HMS to profile customer groups to provide more targeted assistance to borrowers during the servicing lifecycle and at redemption.)	<ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Share equity information</li> <li>• CRE borrower and loan information</li> <li>• Credit and anti-fraud data.</li> </ul>
Collecting or refunding payments made on account due to the lender	Legitimate interests of HMS (to recover debts owed to our clients (the lender))	<ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Email address</li> <li>• Telephone number</li> <li>• Bank account details</li> </ul>

		<ul style="list-style-type: none"> <li>• Information about your shared equity mortgage and second charge deeds.</li> <li>• Credit and anti-fraud data.</li> </ul>
Collecting of payment of fees owed to HMS	Legitimate interests of HMS (to recover monies owed to HMS for the process of redeeming the borrowers shared equity mortgage as per the contracts).	<ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Email address</li> <li>• Telephone number</li> <li>• Bank account details</li> <li>• Information about your shared equity mortgage and second charge deeds.</li> <li>• Credit and anti-fraud data.</li> </ul>
<b>Post redemption</b>		
Facilitating payment plans	Legitimate interests of HMS (to ensure that borrowers are able to meet their financial obligations)	<ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Email address</li> <li>• Telephone number</li> <li>• Bank account details</li> <li>• Information about your shared equity mortgage and second charge deeds.</li> <li>• Credit and anti-fraud data.</li> </ul>
Facilitate other forbearance options	Legitimate interests of HMS (to ensure that borrowers are able to meet their financial obligations)	<ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Email address</li> <li>• Telephone number</li> <li>• Bank account details</li> <li>• Information about your shared equity mortgage and second charge deeds.</li> <li>• Credit and anti-fraud data.</li> </ul>