

The Key & GDPR

This document details how the Key already fulfils GDPR requirements and the further enhancements that have been made in light of customer feedback and consultation. The enhancements are available in the Key v5.4.

Personal data

- The Key stores personal data collected by system users
- All data is stored on servers located in the UK
- All data is protected by both software AND physical security systems, including 24-hour monitoring
- Mortgage Brain has no access to the user's or client's data (except in specific circumstances)
- Mortgage Brain are responsible for ensuring users can meet their GDPR responsibilities

Enhancements in v.5.4

Consent

- Multiple consent options in the Key collated into a single Consent Manager
- Users are able to record 'processing' consent (i.e. to actually hold the personal data)
- Quick access to user defined 'privacy policy' has been added
- Users are able to record marketing consent via mail, email, telephone and text message
- Agreement is automatically dated
- Users are prompted for confirmation/update to ensure consent remains valid when creating a new sale

Right to be forgotten/Deletion

- All deletion processes have been reviewed to ensure **all** personal data is removed
- There is a new function to select multiple client records to be deleted in one go – functionality restricted according to user permissions
- Users are able to search free text recorded as 'Notes' in order to search for – and delete – personal data not stored in the main client record
- Audit record of deletion activity is available

Data portability

- Existing export procedures have been reviewed to ensure all necessary personal data is available
- Industry standard formats are now used
- Records of export activity are now kept in the Key

Fact Find

- Data capture has been fully reviewed
- Amendment of dependants details is recorded to ensure compliance with GDPR restrictions

Adviser's responsibilities

- To ensure computers running the Key are fully secured
- To ensure the Key is only run on versions of Windows supported by Microsoft
- To ensure Windows is kept fully up to date with the latest security patches
- To create strong passwords for log on to Windows
- We recommend the use of hard disk encryption and screen savers