

Mortgage Brain Sourcing Systems & GDPR

This document details how Mortgage Brain's sourcing products already fulfil GDPR requirements and the further enhancements being made in light of customer feedback and consultation. The enhancements are available in version 2.2 of both MortgageBrain Classic and MortgageBrain Anywhere.

MortgageBrain Classic

Personal data

- MortgageBrain Classic stores personal data collected by system users
- Data is stored in the following:
 - Client database
 - MTE applications
 - Various documents, including Fact Finds
- Users of the system do have a legitimate reason for collecting data
- Mortgage Brain has no access to the user's data (except in specific circumstances)
- Mortgage Brain are responsible for ensuring users can meet their GDPR responsibilities

Fulfilled GDPR requirements

- Access to the user's client database is protected with a strong password
- Users have to log in with a unique user name and password
- Users are able to export client data
- Users are also able to search for clients and use delete functions as necessary

Enhancements in v2.2:

Right to be forgotten/Deletion

- The client deletion function has been enhanced to cater for different variants of deletion
- A new option allows the user to record a free text note when clients are deleted
- There are a series of pop-up warnings prior to a user deleting data and documents
- New functionality for the user to be able to 'List all deletions' for a specific date range
- New functionality for the user to be able to review dormant clients details

Data portability

- Existing export procedures have been reviewed to ensure all necessary personal data is available
- The export function has been extended to allow data for Applicant 1, 2 or both

Other enhancements:

- Increased security of the archived document store
- Audit data has been reviewed to ensure it doesn't contain unnecessary personal information

Adviser's responsibilities:

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

MortgageBrain Anywhere

Personal data

- MortgageBrain Anywhere stores limited personal data collected by system users
- Data is stored in the following:
 - Documents produced contain personal data
 - in a central system database hosted either by Mortgage Brain OR by the adviser firm
- Users of the system do have a legitimate reason for collecting data
- If personal data is hosted by Mortgage Brain, then Mortgage Brain is a Data Processor under GDPR
- If personal data is hosted by the adviser firm, then Mortgage Brain has no formal GDPR responsibilities as personal data is not accessible
- Mortgage Brain are responsible for ensuring users can meet their GDPR responsibilities

Data Security – personal data hosted by Mortgage Brain

- Hosted in industrial strength data centres with leading Internet Service Providers
- Data centres have sophisticated physical and software security systems (24/7 monitoring, CCTV, firewalls, anti-virus, regular security patching)
- Mortgage Brain carries out annual penetration testing with a third party security company

Data Security – personal data hosted by the Adviser Firm

- The adviser firm is responsible for the security of the data storage (see Adviser's Responsibilities section under MortgageBrain Classic)

Enhancements in v2.2:

- The client deletion function has been extended to ensure all client data is deleted
- There is an option to record a free text note with each deletion
- When sharing client data with the Key, new functionality ensures that only clients that were created in MortgageBrain Anywhere are deleted
- There is an option to 'List all deletions' for a specific date range
- There is new functionality to be able to review dormant clients details
- Users can export client data to CSV format
- There is new functionality to keep a record of all client data exports