
Data Protection Statement

How we collect, use and protect your personal information

Why you should read this notice

When you deal with us, we ask for detailed information about your circumstances, your finances and, in some cases, your health. This notice explains what we do with that information, who we share it with, how long we keep it, and your rights.

Who we are

Torch Financial Ltd (company no. 12830760), 18 Windsor Place, Cardiff CF10 3BY, is the controller of your personal information. We are registered with the Information Commissioner's Office, registration number **ZA781921**.

We are an appointed representative of **Ngage Finance Ltd**, which is authorised and regulated by the Financial Conduct Authority and is responsible for the advice we give you. Ngage Finance Ltd will also use your information to oversee our work, review our files, handle any complaint and meet its own regulatory obligations. It is a controller of your information for those purposes, and its Privacy Notice is available at www.ngagefinance.co.uk/privacy.

Our data protection contact is **Craig Price**. You can contact him at craig.price@torchfinancial.co.uk or on 07904 776365.

The information we collect

To help with your finance requirements, we may collect: your name, date of birth, contact details, address history, nationality and the documents needed to verify your identity; your employment, income, bonuses and benefits; your bank details, tax information, credit commitments and credit history; your income and spending, family circumstances and dependants; details of any existing loans or mortgages; and details of the property you are buying or borrowing against.

Health information. In some cases we need information about your health, for example where it affects your income, your ability to repay, or the support you need from us. Health information is a special category of personal information, and we only collect and use it with your explicit consent (see below).

Criminal convictions. Some lenders ask about unspent criminal convictions. Where a lender requires this, we collect only what the lender asks for, and use it only for your application.

Where we get it from

Most of the information comes directly from you, in meetings, calls, emails and documents you send us. We may also obtain information from: credit reference agencies; identity and anti-money laundering checks; public sources such as the electoral roll and Companies House; your employer or accountant, where you ask them to confirm your income; lenders and valuers; and, if another broker introduced you to us, that broker.

Electronic identity checks. We verify your identity, address and whether you are subject to sanctions or are a politically exposed person using an electronic verification service. These checks are part of our legal and regulatory obligations, so we do not need your consent, but we will tell you when they are carried out.

Why we use it, and our legal basis

To provide our service to you. We use your information to understand your needs, research and recommend suitable products, and submit and progress your application. This is necessary to perform our contract with you, or to take steps at your request before entering into one.

To meet our legal and regulatory obligations. We must keep records of our advice, verify identity, prevent financial crime and respond to our regulator, the Financial Conduct Authority. This is necessary to comply with our legal obligations.

For our legitimate interests. We use your information to respond to lender and compliance reviews of our advice, to handle complaints, to improve our service, and to ask for feedback on the service you received. We only do this where our interests are not outweighed by your rights.

With your explicit consent. We use health information only with your explicit consent. You can withdraw your consent at any time, but we may then be unable to progress an application that depends on it.

Who we share it with

We share your information only where it is needed to arrange your finance or meet our obligations. This may include: lenders and their valuers and solicitors; your solicitor or conveyancer; estate agents; credit reference and identity verification agencies; Ngage Finance Ltd, our principal, and its compliance consultants, who review our files; the broker who introduced you to us, if any, to the extent needed to progress your case; and the technology providers we use to store information and run our business, such as our case management, email and cloud storage systems, under contracts that require them to keep your information secure.

We may also share information with the Financial Conduct Authority, the Financial Ombudsman Service, law enforcement or other authorities where the law requires.

The organisations we share with may not use your information to send you marketing.

Marketing and feedback

We will only send you marketing about our services, including products and services we think may suit you, if you have agreed to it, and you can opt out at any time. We may contact you after your case completes to ask for feedback or a review.

Transfers outside the UK

We do not normally send your information outside the UK. Some of our technology providers may store or process information outside the UK. Where they do, we make sure your information is protected by an adequacy decision or appropriate contractual safeguards.

Our website

Our Cookie Policy explains the information collected through cookies on torchfinancial.co.uk.

Keeping your information secure

We keep your information on secure systems, with access limited to staff and consultants who need it to provide our service. Please help us protect your information by sending documents through secure channels and not by unprotected email where possible.

We will never ask you to pay money or change bank details by email alone. If you receive a payment request, call us on 07904 776365 to check it is genuine, using a number you have found independently.

How long we keep it

We keep your information for as long as we need it to provide our service and to meet our legal and regulatory obligations. In most cases this is six years after our relationship with you ends, and longer where we must keep records of regulated advice or where there is a complaint or legal claim. When information is no longer needed, we delete or securely destroy it.

Your rights

You have the right to: ask for a copy of the information we hold about you; ask us to correct information that is inaccurate or incomplete; ask us to delete your information, where we no longer need to keep it; ask us to restrict how we use it; object to our use of it, including for marketing; ask us to transfer it to you or another organisation; and withdraw your consent, where we rely on it. We do not make decisions about you using solely automated processing.

To use any of these rights, contact Craig Price at craig.price@torchfinancial.co.uk or on 07904 776365. We will respond within one month. If your request is complex, we may extend this by up to two further months, and we will tell you within the first month if we need to.

Complaints

If you are unhappy with how we have handled your information, please contact us first so we can try to put it right. You also have the right to complain to the Information Commissioner's Office, the UK data protection regulator, at ico.org.uk or on 0303 123 1113.

Changes to this notice

We review this notice regularly. This version was last updated in October 2026.