

Privacy Policy

Date	Version	Amendment	Prepared by	Sign off
2017 Aug 01	1.0	New Policy	NT	CT
2020 Aug 03	2.0	Revisions	NT	CT
2023 Aug 04	2.0	No changes	NT	CT

Glossary

AML	Anti-Money Laundering
CRA	Credit Reference Agencies
DPA	Data Protection Act 2008
DPO	Data Protection Officer
EEA	European Economic Area
FRA	Fraud Prevention Agencies
GDPR	General Data Protection Regulation
ICO	Information Commissioner's Office
PEP	Politically Exposed Persons

Azure Financial Solutions Limited "AFSL"

Company Registration Number	6223698
ICO Registration Number	Z9953056
DPO	Colin Taylor
Trading Address	28 The Maltings, Roydon Road, Stanstead Abbots, Hertfordshire, SG12 8HG
Registered Address	Unit C1, The Maltings, Station Road, Sawbridgeworth, Hertfordshire, CM21 9JX
Telephone Number	01920 876 900

1. Introduction

- 1.1 AFSL takes its Data Protection responsibilities seriously and AFSL are committed to using the personal data AFSL hold in accordance with the law. AFSL's Privacy Policy describes AFSL's policies and procedures regarding its collection, use and sharing of your personal data, and sets forth your privacy rights under GDPR and DPA regulations. This will include personal information AFSL collect directly from you, a third party or information AFSL already hold about you. AFSL recognise that information privacy is an on-going responsibility, and so will from time to time update this Privacy Policy as AFSL undertake new personal data practices or adopt new privacy policies.
- 1.2 AFSL's DPO can answer any queries you might have regarding your personal Information or if you wish to exercise any of the rights mentioned within this Privacy Policy. Please contact AFSL's DPO by:
- Tel: 01920 876 900, or by
 - Post: 28 The Maltings, Roydon Road, Stanstead Abbots, Hertfordshire, SG12 8HG.
- For more information about your rights please see Section 13.
- 1.3 For the purposes of the DPA, AFSL is a data controller:
- Registered address of Unit C1, The Maltings, Station Road, Sawbridgeworth, Hertfordshire, CM21 9JX.
 - Trading address of 28 The Maltings, Roydon Road, Stanstead Abbots, Hertfordshire, SG12 8HG.
- 1.4 This Privacy Policy contains up to date information about how AFSL uses your personal information, this policy will update any previous information about how AFSL process and use your personal information.

2. About AFSL

- 2.1 When AFSL collect and use personal information about you, AFSL become responsible for this information. When AFSL do this, AFSL are regulated by the GDPR. Under this regulation AFSL is known as a 'data controller' of that personal information.
- 2.2 By personal information, AFSL mean information which can be used to identify you. For the purposes of this privacy policy, where AFSL refer to "you" or "your" AFSL are referring to individuals whose information AFSL process, this includes business owners and any key personnel from the party making the application or entering into an agreement.
- 2.3 Group Companies
- AFSL may share your information between companies in AFSL's group in order to provide you with AFSL's products and services and to develop and enhance AFSL's products and services.

3. How AFSL Collect Personal Information

3.1 AFSL will obtain personal information:

- Directly from yourself, from e.g. order form / application documents / telephone / email.
- Through the course of an agreement either directly from you, your association or with a business supplier / brokers who introduce you to us.
- Professional advisors (including accountants, lawyers, consultants), and
- From third party organisations such as CRA's and FPA's.

3.2 AFSL may also obtain personal information from either monitoring or recording calls. AFSL may record and monitor telephone calls for training, auditing, resolving queries and to improve overall quality and service delivery. When AFSL processes your personal information, this will be either for AFSL's legitimate business interest, to comply with AFSL's legal obligations, to support AFSL's relationship with you or where AFSL have your consent as set out in Section 8.

3.3 In the course of dealing with your application and any subsequent agreements you enter into, AFSL may collect the following personal information:

- Your title, full name, contact details, email address, home and mobile telephone numbers.
- Your home address and address history, together with information about your occupier status.
- whether you are a tenant, live with parents or are an owner occupier.
- Your date of birth.
- Your occupation, job title and employment details.
- Your personal identification i.e. a passport or a driving license.
- Your nationality if this is necessary for AFSL to comply with AFSL's legal and regulatory requirements.
- Your bank details.
- Your solvency and / or litigation history.
- Details of any convictions, disciplinary actions or regulatory actions, and
- Personal information obtained from third parties such as CRA's or FPA's and publicly available sources of information such as the electoral roll and court records of debt judgements and bankruptcies.

3.4 Those making an application should not share any other individual's personal information with AFSL except where they have shown them a copy of this privacy policy and obtained their confirmation that they know you will share it with AFSL for the purposes described.

3.5 Depending on how you make your application AFSL may collect this information directly or indirectly.

4. How AFSL uses your Personal Information

4.1 Information you provide voluntarily to us:

4.1.1 You may give AFSL your personal information when you:

- When you take out a financial product.
- Use AFSL's products and services.
- Correspond with or contact AFSL or raise any concerns with us.
- Request contact through AFSL's website.
- Communicate with AFSL regarding the repayment of your financial product(s).
- Agree to be referred to us.

- Otherwise interact with us.
- 4.2 Please note that telephone calls to and from AFSL's office are not recorded.
- 4.3 Information AFSL may collect automatically:
- 4.3.1 AFSL, or the companies which work on AFSL's behalf, may collect certain related data of visitors to AFSL's website automatically, including:
- Your use of AFSL's website (for example, what pages you have viewed and what links you have clicked on).
 - How you arrived at AFSL's website in the first place.
 - Your website journey.
 - Information about your operating system, IP address and browser type.
 - Your login details.
- 4.4 For further information please see AFSL's cookies notice.
- 4.5 AFSL may seek external CRA's to verify your identity or other directors / partners / employees and undertake checks for the prevention and detection of fraud or money laundering. The CRA's supply to AFSL both public (including electoral register) and shared credit information. If you are a director, AFSL will seek confirmation, from credit reference agencies, that the residential address that you provide is correct.
- 4.6 If you give AFSL false or inaccurate information or AFSL identifies fraud, AFSL may record this with fraud prevention agencies. Law enforcement agencies may access and use this information. AFSL and other organisations may access and use information recorded by fraud prevention agencies in other countries.
- 4.7 Information for individuals
- 4.7.1 In order to process your application, AFSL may perform credit and identity checks on you with one or more CRA's. AFSL may also verify some of the information you gave to AFSL when you applied, for example your income and credit commitments.
- 4.7.2 When CRA's receive a search from AFSL they will place a search footprint on your credit file that may be seen by other lenders.
- 4.7.3 If you give AFSL false or inaccurate information or AFSL identifies fraud, AFSL may record this with fraud prevention agencies. Law enforcement agencies may access and use this information. AFSL and other organisations may access and use information recorded by fraud prevention agencies in other countries.
- 4.8 Information about financial associates
- 4.8.1 AFSL may, before entering into any Agreement with you / your business, search records at CRA's which may be linked to your spouse / partner / other persons with whom you are linked financially. For the purposes of any application or AFSL's Agreement you may be treated as financially linked and you will be assessed with reference to "associated records" so you must be sure that you have the agreement of your associate to disclose information about them.
- 4.8.2 Where any search or application is completed, or agreement entered into involving joint parties you all consent to AFSL's recording details at CRA's. As a result, an "association" will be created that will link your financial records and your associate's information may be taken into account when a future search is made by AFSL or another lender unless you file a "disassociation" at the CRA.
- 4.9 For further information about CRA's please telephone AFSL on 01920 876 900 if you want to have details of the credit reference agencies from whom AFSL obtain, and to whom AFSL pass, information about you.

5. Automated Processing

- 5.1 AFSL may use automated means to make decisions about you related to:
- AML and PEP checks.

- Identity and verification checks.
- Fraud checks.
- Determining if an account is dormant / has a nil balance and dealing with its closure.

6. AFSL's Legal Basis for Processing your Personal Information

6.1 AFSL will only use your personal information where it is permitted by laws that protect your privacy rights. When you enter into any agreement with AFSL, AFSL will use your personal information where:

- It is fair to use the personal information either in AFSL's interests or someone else's interests, where there is no disadvantage to you – AFSL refer to this as legitimate business interest.
- AFSL need to use the information to support AFSL's relationship with you.
- AFSL need to use the information to comply with AFSL's legal obligations, and
- AFSL have your consent (if consent is needed).

6.2 Where AFSL have your consent, you have the right to withdraw this. AFSL will let you know how you can do this at the time AFSL gather your consent.

7. Corporate Transactions

AFSL may share information with third parties involved in any reorganisation, restructuring, merger or sale, or other transferring of assets (including assigning any of AFSL's rights or obligations under any agreement AFSL may have with you), provided the receiving party gives appropriate assurances of compliance with the general data protection regulation.

8. Sharing your Personal Information

8.1 Who AFSL share your personal information with is dependent on the products or services AFSL provide to you. For the majority of AFSL's products and services AFSL will share your personal information with AFSL's funders, brokers, suppliers, CRA's and FPA's. For more information on how AFSL use your personal information please see Section 4.

8.2 The personal information AFSL have about you is usually gathered from you direct or through the course of an agreement, from public domain or third parties. In some circumstances AFSL will transfer and obtain personal information from third parties where it is necessary for purposes such as credit checking and fraud prevention or for marketing purposes.

9. Keeping your Personal Information Secure

9.1 AFSL have adopted appropriate security measures to ensure your personal information remains secure. This prevents your personal information from being accidentally lost, used or accessed in an unauthorised way. AFSL limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

9.2 AFSL also have procedures in place to deal with any suspected information security breach. AFSL will notify you and any applicable regulator of a suspected information security breach where AFSL are legally required to do so.

10. How long AFSL keeps your Information

10.1 AFSL will only keep information about you for as long as AFSL need to fulfil the purposes for which AFSL are processing your information. After that AFSL will either delete or anonymise your data.

10.2 The criteria AFSL uses to determine how long to retain data includes:

- The type of data and the nature of AFSL's relationship with you.

- The original purpose of the processing.
- Any legal or regulatory obligations (for example, to comply with Money Laundering Regulations or HMRC requirements).
- Any other legitimate interest AFSL may have (for example, in the establishment, exercise or defence of legal claims or complaints, to assist with fraud prevention and monitoring).
- Any other legitimate reason (for example, to maintain records for audit purposes or to maintain records of those who do not wish to receive marketing from us).

11. Transferring Information outside of the UK

In providing AFSL's products and services to you AFSL may transfer your personal information outside the UK. Any transfer of your personal information will be in accordance with AFSL's legal obligations to ensure the safeguarding of your personal information during such transfer. If you would like more information or the details of the safeguards, AFSL have in place to protect your personal information please contact AFSL's DPO using the details set out in Section 1.

12. Your Rights

- 12.1 Under the GDPR you have a number of rights in terms of how AFSL use your personal information. You have the right to object how AFSL use your personal information. You also have the right to access the personal information AFSL holds about you. You can also ask AFSL to delete, restrict or correct any inaccuracies in your information. You can also ask AFSL to provide some of your information to a Third Party.
- 12.2 You have the following rights in relation to the personal data AFSL holds about you. In order to help AFSL to respond efficiently to your request, AFSL may ask you to verify your identity. You can exercise your rights by emailing AFSL at nick.taylor@azurefs.co.uk or writing to AFSL at the address in Section 1.
- 12.3 It is normally free to exercise your rights. However, in some circumstances AFSL may charge a reasonable fee, for example, if your request is manifestly unfounded or excessive or repetitive. AFSL will tell you if this is the case.
- 12.4 AFSL may refuse to act on your request to exercise a right. Where AFSL do so AFSL will explain why and tell you about any further rights you may have.
- 12.5 AFSL will do its best to respond to you as quickly as possible and within one month of the receipt of your written request. If AFSL need longer to respond, for example, due to the complexity of your request, AFSL will tell when you can expect to hear from us.
- 12.6 You may only exercise these rights as, or on behalf of, an individual. Therefore, these rights do not apply to companies or other legal entities. However, you may exercise your rights as an individual employee or sole trader or partnership.

12.7 Right to Object

You have the right to object how AFSL uses your personal information. This means you may object at any time to processing of personal information for direct marketing and decisions being made by automated means in addition to information being processed in certain other situations. If you would like to make an objection, please contact AFSL's DPO with the reasons for your objection.

12.8 Right of Access

This allows you access to your personal information and to certain other supplementary information that this Privacy Policy is already designed to address. You can request access to a copy of your personal information that AFSL holds in addition to why AFSL uses it, how long AFSL keeps it for, who AFSL shares it with and whether it has been used for any automated decision making. This will be provided to you in an electronic format from a secure portal or hard copy.

AFSL may ask for additional information in relation to your identity for security reasons before providing any information.

12.9 **Right to Rectification**

This gives you the right to request AFSL to change or complete any incorrect or partial information AFSL holds about you.

12.10 **Right to Erasure**

This gives you the right to ask for personal information that AFSL holds about you to be erased where it is no longer necessary for AFSL to use or keep the information, you have withdrawn consent or if AFSL have no legal basis to keep the information.

12.11 **Right to Portability**

This gives you the right to transmit some of the personal information AFSL holds about you to a third party. The information can either be provided to you in a commonly used, machine-readable format or can be provided to the third party direct. This only applies to personal information you have given to AFSL direct, if it is for the performance of a contract, based on consent or when processing is done by automated means.

12.12 **Right to Restriction**

12.12.1 You have the right to restrict how AFSL processes your personal information in circumstances where you have exercised your right to object, rectification or erasure. If you would like to exercise any of your rights listed above, please contact AFSL's DPO using the details listed in Section 1. Please provide AFSL with the following:

- Enough information to identify you, including proof of identity and address (passport, driving licence and a utility bill), and
- Any information that your request relates to, including any account or reference numbers.

12.12.2 For further information on each of your rights, including the circumstances in which they apply, please see the Guidance from the UK ICO on individual's rights under the GDPR.

12.13 You can find out more information at: <https://ico.org.uk/your-data-matters>

12.14 If you would like to exercise any of these rights, please contact AFSL's DPO at the address listed in Section 1.

13. **Personal Information Retention**

13.1 The length of time AFSL keeps your personal information for is dependent on how the information is used and recorded. AFSL will never retain your personal Information for longer than the purposes AFSL requires it for or is necessary for AFSL to retain. Generally, this will be up to seven years after the end of the agreement or application in order to comply with AFSL's legal obligations.

13.2 If you would like more information about how long, AFSL keeps your information please contact AFSL's DPO using the details listed in Section 1.

14. **Your Responsibilities**

14.1 It is your responsibility to provide AFSL with honest, accurate and up to date information both when you apply for a lease / account / Agreement with AFSL and during AFSL's relationship with you.

14.2 If false or inaccurate information is provided to AFSL and fraud is identified, details may be passed to fraud prevention agencies, or other law enforcement agencies. Further details explaining how the information held by fraud prevention

agencies may be used can be found in the credit agreement AFSL will provide you with prior to your applying for a lease with us. Once you have been approved for a lease, your credit agreement can be accessed via your online account, by using the login details AFSL will provide you with.

- 14.3 You are responsible for maintaining the secrecy of your unique password and account information, and for controlling access to your email communications at all times. There are some simple steps that you can take to keep your information secure; <https://getsafeonline.org> provides practical advice on how to protect yourself, your computers and mobile devices against fraud, identity theft, viruses and many other problems encountered online.

15. Children / Minors

Those under the age of 18 are not eligible for AFSL's services.

16. Your Online Activities

AFSL uses cookies to track your use of AFSL's website www.azurefs.co.uk.

17. More Information about Cookies

- 17.1 A cookie is a small file which is sent to your browser and stored on your computer's hard disc and enables AFSL to track and understand your usage of AFSL's website and where AFSL can make improvements to the information and services AFSL provides to you. AFSL use cookies solely to gather information on IP addresses, administer the website and track your movements on the website. For more information about blocking the use of cookies, please refer to the guidance on your internet browser.

- 17.2 Please note you may not be able to use or access certain areas of AFSL's website if you block all cookie usage.

18. Links to Other Websites

Our site may contain links to other websites. The information contained within this policy does not cover those links. You should read the privacy policy on the other websites you visit or contact those companies for information on how they collect and use your information.

19. Marketing and Advertising

If you've previously indicated to AFSL that you'd like to hear about the products and services of AFSL's group, or other carefully selected companies, AFSL or they may contact you by post, telephone, email or text. You can change your preferences / unsubscribe at any time – just send AFSL an email to nick.taylor@azurefs.co.uk. AFSL will action your request as soon as AFSL reasonably can.

20. How to Make a Complaint

- 20.1 If you have a question, query or complaint with how AFSL processes and uses personal information, please contact AFSL and AFSL will do its best to resolve it as soon as possible. You can do this by contacting AFSL's DPO with the details listed in Section 1.
- 20.2 AFSL hope that it can resolve any query or concern you raise with AFSL directly, however if AFSL are unable to do so the GDPR also gives you right to lodge a complaint with a supervisory authority. The supervisory authority in the UK is the ICO who may be contacted at <https://ico.org.uk/concerns/>.