

CREATIVE ✓ E

Dear Introducer

In support of your obligations under GDPR we want you to know how we use the personal data of your customers that you send to us from time to time during the course of our business together.

We promise:

- To keep such data safe and private, sharing it only with third parties for the purpose of assessing and developing a successful application for funding.
- Not to sell such data, except insofar as we receive a commission for successfully arranging finance for your customer.
- To give your customers ways to manage and review their marketing choices at any time.

HOW WE WILL USE THE INFORMATION YOU GIVE US

We take privacy seriously and use personal information in a number of ways which will help us;

- Decide which funders may be interested in a certain data subject,
- For fraud prevention,
- For audit,
- For statistical analysis,
- In making credit reference checks

We may share information with, and obtain information about your customers from, credit reference agencies or fraud prevention agencies. However we will not refer the personal information of a data subject to a credit reference agency after the expiry of three months from the date of consent, unless we receive a further consent from them to do so.

We will not disclose your customers' information to any company outside of Creative Funding Solutions Limited except to help prevent fraud or obtain or give effect to a third party decision for funding on their behalf or if required by law to do so.

What we use personal information for

Our reasons

What this looks like

- To manage our relationship with your customers or your business.
- To develop new ways to meet our customers' needs and to grow our business.
- To develop and carry out marketing activities.
- To study how our customers use products and services from us and other organisations.
- To provide advice or guidance about our products and services.

- Your customer's consent.
- Fulfilling contracts.
- Our legal duty.

- Keeping our records up to date, working out which products and services may interest your customer and telling them about them.
- Developing our service, and what we charge for them.
- Defining types of customers for new products or services.
- Seeking your customer's consent when we need it to contact them.
- Being efficient about how we fulfil our legal duties.

- To develop and manage our brands, products and services.
- To test new products.
- To manage how we work with other companies that provide services to us and our customers.

- Fulfilling contracts.
- Our legal duty.

- Developing our offering and revenue generation.
- Defining types of customers for new products or services.
- Being efficient about how we fulfil our legal and contractual duties.

- To deliver our products and services.

- Fulfilling contracts.
- Our legal duty.

- Being efficient about how we fulfil our legal and contractual duties.
- Complying with regulations that apply to us.

- To detect, investigate, report, and seek to prevent financial crime.
- To manage risk for us and our customers.
- To obey laws and regulations that apply to us.
- To respond to complaints and seek to resolve them.

- Fulfilling contracts.
- Our legal duty.

- Developing and improving how we deal with financial crime, as well as doing our legal duties in this respect.
- Complying with regulations that apply to us.
- Being efficient about how we fulfil our legal and contractual duties.

- To run our business in an efficient and proper way. This includes managing our financial position, business capability, planning, communications, corporate governance, and audit.

- Our legal duty.

- Complying with regulations that apply to us.
- Being efficient about how we fulfil our legal and contractual duties.

- To exercise our rights set out in agreements or contracts.

- Fulfilling contracts.

If your customers choose to opt in to marketing contact we may use their personal information that we keep on file to contact them with details of finance products, assets for sale or competitions that we may run from time to time. The methods by which they will be contacted will be nominated by them, and can include post, email, phone, text or automated call. However we do not anticipate a high participation rate in these marketing programmes and they are not a key acquisition channel for us.

Creative Funding Solutions Limited will be what is known as the 'controller' and the 'processor' of the personal data you provide to us. We collect personal data about customers which may also include any special types of information or location-based information.

WE ALSO GATHER

Name, title, address, email, dependents, financial status, telephone numbers, date of birth, banking details, brokered agreements, digital and physical proofs of identity, employment details, finance requirements.

Type of personal information	Description
Financial	Financial position, status and history.
Contact	Residence/work contact info.
Socio-Demographic	This includes details about profession, nationality and income.
Contractual	Details about the products or services we provide
Locational	Data we get about where web users are, such as may come from visiting our website.
Technical	Details on the devices and technology used to access our website.
Communications	What we learn from letters, emails and conversations.
Social Relationships	Family, friends and other relationships, where such information is pertinent to a legal obligation.
Open Data and Public Records	Details that are in public records, such as the Electoral Register, and information that is openly available on the internet.

Usage Data	Other data about how we acquire customers for our products and services.
Documentary Data	Details that are stored in documents in different formats, or copies of them. This could include things like passports, drivers licences or birth certificates.
Special types of data	<p>The law and other regulations treat some types of personal information as special. We will only collect and use these types of data if the law allows us to do so:</p> <ul style="list-style-type: none"> • Racial or ethnic origin • Religious or philosophical beliefs • Trade union membership • Genetic and bio-metric data • Health data including gender • Criminal convictions and offences
Consents	Any permissions, consents or preferences that are given us. This includes things like how individuals want us to contact them.
National Identifier	A number or code given to persons by a government to identify them, such as a National Insurance number, or licence number.

WHY WE NEED IT

We need to know a data subject's basic personal data in order to provide them with an accurate recommendation for their personal circumstances. We do not collect any personal data we do not need in order to provide and oversee this service to your customers.

For processing of data to be lawful under GDPR Creative Funding Solutions Limited use;

Consent: the individual has given clear consent for us to process their personal data for a specific purpose.

Contract: the processing is necessary for a contract we have with the individual, or because they have asked us to take specific steps before entering into a contract.

Legal obligation: the processing is necessary for us to comply with the law (not including contractual obligations).

In addition to this we may also rely on our legitimate interests in the processing of personal information.

WHAT WE DO WITH IT

All the personal data we use is controlled by Creative Funding Solutions Limited in the UK, however, for the purposes of IT hosting and maintenance, this information is located on servers within the European Union. In the event of the UK no longer having member status within the EU, this information will be held on servers within the UK. No 3rd parties have access to your customers' personal data unless the law allows them to do so. We have a Data Protection regime in place to oversee the effective and secure processing of this personal data. More information on this framework can be found on our website.

We may pass your customers' data to third party funders or other finance brokers in order to provide them with offers of products suitable to meet your customers' requirements.

All data is stored electronically on our cloud encrypted server. Our server is based in the UK.

HOW LONG WE KEEP IT

We are required under The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 to keep this basic personal data, such as name, address, email, dependents, telephone numbers, date of birth, brokered agreements, and digital and physical proofs of identity for a minimum of 6 years after the end of any agreement, after which time it will be destroyed. The information used for marketing will be kept with us until the customer notifies us that they no longer wish to receive this information. Any other information will be kept for 6 years unless the customer objects.

WHAT ARE YOUR CUSTOMERS' RIGHTS?

If at any point a data subject believes retained information is incorrect they can request to see this information and even have it corrected and possibly deleted. Providing them with this information is free of charge, but charges may apply for excessive requests.

If you wish to raise a complaint on how we have handled your customer's data, you can contact our Compliance Director who will investigate the matter.

Where relevant, your customers have the right to withdraw consent at any time and this means that we cannot process their data provided without their consent, unless we have other lawful grounds for doing so. If they believe we are processing their personal data not in accordance with the law they can complain to the Information Commissioner's Office (ICO).

Our Compliance Director is Mike Lowe and you can contact him at director@creativefs.co.uk

Please do contact him directly if you have any further questions.