

***Why does this Policy exist?***

Moorgate Finance Limited (the Company) along with other members in its group, are committed to protecting the privacy of your personal information. For applicable data protection law, including the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR), the Company is the data controller.

***What does this Policy cover?***

Our Policy explains our treatment of personally identifiable information which we gather from you, including during your use of our website and when you interact with us in other ways offline. If you have any questions regarding our Policy, please contact us at the address on the Contact Us page of this site or email us at [compliance@moorgatefinance.co.uk](mailto:compliance@moorgatefinance.co.uk).

We gather various types of information from our users, as explained in detail below, and we use this information in connection with our services, including to personalise, provide and improve our services, to fulfil your requests for certain services and in some cases, to analyse how you use those services.

We may update our policies from time to time for any of the following reasons:

- to provide for the introduction of new or improved systems, methods of operation, services or facilities; to reflect an actual or expected change in market conditions or general banking practice;
- to comply with or anticipate any changes in any legal or regulatory requirement;
- to ensure that our business is run prudently;
- to make our policies clearer or more favourable to you; or to rectify any outdated information

You must not send us personal information about someone else without first getting the individual's consent for it to be used and disclosed in the ways set out in our Policy. If you give us information (including personal information) on behalf of someone else, you confirm that the other person has given you permission to act on their behalf and has agreed that you can:

- provide their personal information to the Company;
- give consent on their behalf to the processing of their personal data;
- receive on their behalf any data protection notices; and
- give consent to the transfer of the individual's personal data abroad should this be required

Where you provide information about someone else, or someone else discloses a connection with you, that information may be considered along with your other personal information when assessing your application to receive our services.

***What type of personal information do we collect?***

The personal information we collect from you is used primarily to enable us to provide the specific service you require.

Personal information can include the following:

- your title, forename and surname and gender;
- your personal or work related (depending on which you choose to submit) e-mail address
- your personal or work-related contact details (depending on which you choose to submit) such as your telephone number(s), fax numbers and postal address;
- your date of birth and national insurance number;
- your marital status;
- your residential status and address details for the last 3 years;
- occupation, salary and annual income information;
- employment status;
- employer details and time periods in that occupation and with that employer and any other employers within a 3-year period;
- your bank details, including your bank name and address, sort code, account number, account name, account type and time at your bank;
- Health status and history, details of treatment and prognosis, medical reports;
- Any pre-existing investment, mortgage and/or finance products along with terms and conditions relating to these;
- personal information about your credit history which we obtain from Credit Reference Agencies including data which originates from Royal Mail (UK postal addresses), local authorities (electoral roll), the insolvency service, Companies' House, other lenders and providers of credit (who supply data to the Credit Reference Agencies), court judgments decrees and administration orders made publicly available through statutory public registers (see the section on 'Credit Reference Agencies' below);
- your contact and marketing preferences;
- if you take a survey or interact with us in various other ways - demographics information and information about subjects that may interest you;
- information necessary for legal compliance;
- where you "like" us or make posts on our pages on social networking websites, such as Facebook, Twitter, YouTube and Instagram.

This information will be collected primarily from you as information voluntarily provided to us on the basis that both parties are entering a contract for the supply of services.

We may also collect information where lawful to do so from (and combine it with information from) credit reference and fraud prevention agencies, public sources, third party service providers, tax or law enforcement agencies and other third parties. Some of the personal

information obtained from Credit Reference Agencies will have originated from publicly accessible sources.

Credit Reference Agencies draw on court decisions, bankruptcy registers and the electoral register (also known as the electoral roll).

### ***Special Category Personal Data***

We may collect sensitive confidential data known as “special category personal data”, in the form of health information.

Where you ask us to assist you with for example insurance, in particular life insurance and insurance that may assist you in the event of an accident or illness, we will ask you information about your health and medical history (Your Special Data). We will record and use Your Special Data in order to make enquiries in relation to insurance products that may meet your needs and to provide you with advice/guidance regarding the suitability of any product that may be available to you.

Information on Special Category Data and Criminal Disclosures must be capable of being exchanged freely between intermediaries such as our Group of companies, and insurance providers, to enable customers to secure the important protection cover that their needs require.

### ***What other personal information do we collect and why?***

In this section we explain the personal information we collect from you when you interact with us online and offline. Where we explain why we use this information, we have also referred to the relevant legal basis which we consider applies to the processing, as explained in the section above. Presenting the information in this way will make it easier for you to understand your rights in relation to your personal information, and this is explained further below in the sections headed “Your rights to access your personal information” and “Your rights under DP Law”.

### ***Legitimate Interests***

We automatically collect standard internet and website log information to understand how our website visitors behave, which we use to improve your experience online. This may include information about your Internet Service Provider, your operating system, browser type, domain name, the Internet Protocol (IP) address of your computer (or other electronic Internet-enabled device), your access times, the website that referred you to us, the web pages you request and the date and time of those requests.

Any domain name information that we collect is not used to personally identify you but is instead aggregated to measure the number of visits, average time spent on the Website, pages viewed. We use this information to measure the use of our Website and to improve its contents. However, additional services may be available if we have certain information about you.

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When you use any of the services below, you may need to provide us with some additional personal information so that we can liaise with you to deal with your request, query, and/or application. If you do choose to provide us with your personal information, we will collect that information for our own use and for the purposes described in this Policy.

We record phone conversations to offer you additional security, resolve complaints, for staff training purposes and to improve our service standards.

### *Cookies*

The company uses cookies and tracking code to collect information about website usage and to help manage the performance and design of the site. Cookies are files that store information on your hard drive or browser allowing our Website to recognise that you have visited it before.

You can easily delete any cookies that have been installed in the cookie folder of your browser. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org)

Please be aware that restricting cookies may impact on the functionality of Investec websites.

Please note that the use of any information we collect using cookies is subject to our Privacy Policy.

### *We may use your personal information for the following Legitimate interests:*

- to respond and/or deal with your request or enquiry
- to process and administer your application
- to carry out searches at Credit Reference Agencies pre-application, at the application stage, and periodically after that, and when we share your personal information with Credit Reference Agencies
- to improve our products and services and to ensure that content from the websites is presented in the most effective manner for you and for your computer (or another electronic Internet-enabled device);
- to administer the websites;
- for internal record keeping;
- to contact you (directly, either by the Company, Group or through a relevant partner or agent) by e-mail or phone for any of the above reasons;
- where necessary as part of any restructuring of the Company or sale of the Company's business or assets;
- to analyse trends and customer journeys in using and accessing our websites;
- to validate that any electronic or paper-training materials we provide to you are relevant to your business requirements;
- to perform a business health check, to help you define your business requirements;
- to visit your premises

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- to perform any contract the Group has with you or is arranging for you;
- subject to your consent where required under applicable laws, to carry out direct marketing and/or e-mail marketing;

### *Our Legal Obligations*

- monitoring and recording of telephone calls and email communications where necessary for compliance with regulatory rules or self-regulatory practices or procedures relevant to our business, to prevent or detect crime, for quality, training and security purposes; and
- for compliance with our legal, regulatory, and other good governance obligations.

This list is not intended to be exhaustive and may be updated from time to time as business needs and legal requirements dictate. Some of the personal information that we maintain will be kept in paper files, while other personal information will be included in computerised files and electronic databases.

### *How long do we keep your personal information for?*

Your personal data will not be kept for longer than is necessary to fulfil the specific purposes outlined in this Policy and to allow us to comply with our legal requirements.

The criteria we use to determine data retention periods includes the following:

- Retention if you have enquired about a service or your application does not proceed with us. We will retain your personal data for a reasonable period (up to 3 years) after you have enquired or requested a service from us;
- Retention in case of claims. We may retain it for the period in which you might legally bring claims against us (in the UK this means we will retain it for a minimum 6 years after the expiration of your contract or agreement) if and to the extent this is relevant; and
- Retention in accordance with legal and regulatory requirements. We will consider whether we need to retain your personal data after the period described above because of a legal or regulatory requirement. Some or all these criteria may be relevant to retention of your personal data collected in connection with our products and services.

### *How do we share your information with credit reference agencies?*

To process your service requirements, we will perform credit and identity checks on you with one or more CRAs. To do this, we will supply your personal information to CRAs and they will give us information about you. This will include information about your financial situation and financial history. CRAs will supply to us both public (including the electoral register) and shared credit, financial situation and financial history information and fraud prevention information.

We will use this information to:

- Verify your identity;
- Assess your creditworthiness affordability;
- Verify the accuracy of the data you have provided to us;
- Prevent criminal activity, fraud and money laundering;
- Manage your account(s);
- Ensure any offers provided to you are appropriate to your circumstances.

When CRAs receive a search from us they will place a search footprint on your credit file that may be seen by lenders.

<https://www.experian.co.uk/legal/crain/>

<https://www.equifax.co.uk/crain/>

#### *Does the Company share my personal information with third parties?*

We may disclose specific information upon lawful request by government authorities, law enforcement and regulatory authorities where required or permitted by law and for tax or other purposes.

In order to provide you with the financial products you have requested, we may share your personal information within our own group of companies, with our funders or other third-party finance companies. Upon request, we can provide you with a list of the usual finance companies that we might use in such circumstances or notify you in advance of approaching the finance company of which company we intend to use.

Third-party finance companies may use your personal details in the same ways and for the same purposes as set out in this policy.

Your personal information will be made available for the purposes mentioned above (or as otherwise notified to you from time to time); on a 'need-to-know' basis, to provide you with our professional services and third parties who we identify are able to assist us with your enquiry or application and support your needs as identified.

Third parties in this context means providers to the Company or Group for responsible management, accounting, legal, logistics, audit, compliance, information technology, marketing and other services. This may also include providers of call centres, data storage and database hosting services, IT hosting and IT maintenance services. These companies may use information about you to perform functions on our behalf.

We may share personal information within the company group as needed for reasonable management, analysis, planning and decision making, including in relation to taking decisions regarding the expansion and promotion of our product and service offering, customer request fulfilment and for use by those companies for the other purposes described in this Policy.

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We will not sell your personal information to any third party other than as part of any restructuring of the Company or Group or sale of a relevant Group business.

### *Managing your marketing preferences*

We may wish to provide you with information about new products, services, promotions and offers, which may be of interest to you. We may also invite you to take part in market research or request feedback on our services. This communication may occur by e-mail, telephone, post or SMS. We will seek your consent for this where necessary under DP Law.

You also have the right to ask us not to process your personal data for marketing purposes at any time. This means you can change your mind about receiving marketing communications from us when you have previously consented to this. You can opt-out of receiving such communications by clicking the “unsubscribe” link on any email that we send to you or by emailing us at [compliance@moorgatefinance.co.uk](mailto:compliance@moorgatefinance.co.uk) at any time.

Please note that marketing communications are not the same as “information only” communications and that consents are not usually required for us to communicate with you about the products or services you have enquired about or have signed up to obtain, using contact details you have provided for this purpose.

### *Your rights to access your personal information*

#### *You have the right to:*

- be informed about the collection and use of your personal data
- request copies of your personal information that we hold
- rectification, including to require us to correct inaccurate personal data
- have your personal data erased if:
  - the personal data is no longer necessary for the purpose which it was originally collected or processed for
  - we have processed the personal data unlawfully
  - to comply with a legal obligation
- request we restrict the processing of your personal data in the following circumstances:
  - the accuracy of your personal data is contested, and we are verifying the accuracy of the data
  - the data has been unlawfully processed
  - the personal data is no longer needed but you request us to keep it to establish, exercise or defend a legal claim
- data portability including asking us to send an electronic copy of your Personal Data to another organisation should you wish
- object to the processing of your personal data if it is collected for direct marketing purposes, a public task, or legitimate interest only
- not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning or similarly significantly affecting you



To exercise your right to access your personal data please write to us at Moorgate Finance Limited, The Dovecote, Pury Hill Business Park, Alderton Road, Towcester, NN12 7LS.

***Your right to complain to the data privacy supervisory authority***

Without prejudice to any other administrative or judicial remedy you might have, you have the right to lodge a complaint with the UK's Information Commissioner if you consider that we have infringed applicable data privacy laws when processing your personal data. In the UK the Information Commissioner's Office can be contacted using the following link: <https://ico.org.uk/> and giving our ICO registration number ZA087435

***Contact/address details***

If you have any questions about this Policy, please contact us at [compliance@moorgatefinance.co.uk](mailto:compliance@moorgatefinance.co.uk)