

**CHARLES ALEXANDER FINANCE LIMITED**  
**LENDER AND BORROWER PRIVACY POLICY**

**ABOUT US**

**At Charles Alexander Finance Limited (“CAFL”, “we”, “us” or “our”), we are committed to respecting your privacy. This Privacy Policy explains how we collect, use and disclose personal information that we receive when you enter into transactions with us, either as a borrower or a lender.**

It is important that you read this Privacy Policy so that you are fully aware of how and why we are using your data.

We are a private limited company incorporated in England and Wales with company number 09822535 and having our registered address at 35 Westgate, Huddersfield, HD1 1PA. We are also registered as a data controller with the Information Commissioner’s Office.

**CONTACTING US**

If you have any questions about our Privacy Policy or your information, or to exercise any of your rights as described in this Privacy Policy or under data protection laws, you can contact us as follows:

**Charles Alexander Finance Limited**

35 Westgate  
Huddersfield  
HD1 1PA

By email: [admin@caf-ltd.co.uk](mailto:admin@caf-ltd.co.uk)

**DATA PROTECTION PRINCIPLES**

We adhere to the following principles when processing your personal information as data controller:

- 1. Lawfulness, fairness and transparency:** data must be processed lawfully, fairly and in a transparent manner.
- 2. Purpose limitation:** data must be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- 3. Data minimisation:** data must be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- 4. Accuracy:** data must be accurate and, where necessary, kept up to date.
- 5. Storage limitation:** data must be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal information are processed.
- 6. Integrity and confidentiality:** data must be processed in a manner that ensures appropriate security of the personal information, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage by using appropriate technical or organisational measures.

## **PERSONAL INFORMATION WE COLLECT**

### *Information you give us*

You may provide us with information in person, by email, over the phone or otherwise when you are in contact with us, when:

- you request additional information about our business or ask us to contact you;
- we provide our services to you;
- we enter into transactions with you; or
- you send any other information about you to us.

The categories of personal information we may require you to provide include:

- If you are a lender:
  - name;
  - address;
  - phone number;
  - email address;
  - bank account details;
  - employment details;
  - sources of income;
  - passport copy or other identification information;
  - images; and
  - any other information required for KYC and anti-money laundering purposes.
- If you are a borrower (or a representative of a borrower):
  - name;
  - address;
  - phone number;
  - email address;
  - bank account details;
  - information concerning ultimate beneficial ownership;
  - details of any personal guarantees; and
  - any other information required for KYC and anti-money laundering purposes.

We do not generally seek to collect sensitive personal information as part of our business transactions. Sensitive personal information is information relating to racial or ethnic origin; political opinions; religious or philosophical beliefs; trade-union membership; health; sex life, sexual orientation; or genetic or biometric information. If we do collect sensitive personal information, we will ask for your explicit consent to our proposed use of that information at the time of collection.

### *Information we collect from external sources*

We may obtain personal information about you from third parties such as:

- credit reference agencies;
- fraud prevention agencies and identification verification agencies;
- publically available sources, such as social media and online registers or directories;
- financial advisors or others appointed to act on your behalf.

### *Information we collect from you*

We collect and store information concerning the transactions you have entered into with us and your performance in connection with those transactions.

### **WHAT WE DO WITH YOUR PERSONAL INFORMATION**

As data controller, we will only use your personal information if we have a legal basis for doing so. The purpose for which we use and process your information and the legal basis on which we carry out each type of processing is explained in the table below.

<b>Purposes for which we will process the information</b>	<b>Legal Basis for the processing</b>
To carry out our obligations arising from any contracts entered into with you.	It is necessary for us to process your personal information in this way in order to enter into a contract with you and to fulfil our contractual obligations to you.
To carry out identity and fraud checks as part of our onboarding process.	Such processing is necessary to comply with our legal obligations.
To contact you if there is any problem with completing a transaction you requested or your account.	It is necessary for our legitimate interests to ensure that you are provided with the services you have requested.
To send you promotional materials and other materials that may be of interest to you, including information about us, our services, events or general promotions.	It is necessary for our legitimate interests to develop our services and grow our business. To ensure we offer an efficient service, we consider this use to be proportionate and will not be prejudicial or detrimental to you. You can unsubscribe or opt-out from receiving these communications at any time by clicking the “unsubscribe” link in the email.
To provide you with information and materials that you request from us.	It is in our legitimate interests to respond to your queries and provide any information and materials requested in order to generate and develop business.
To: <ul style="list-style-type: none"><li>• manage payments, fees and charges and collect and recover money owed to us;</li><li>• communicate about billing issues; or</li><li>• enforce any contracts entered into with you.</li></ul>	It is in our legitimate interests to process your personal information in this way in order to perform or enforce our contract with you.
To send you information regarding changes to our policies, other terms and other administrative information.	It is in our legitimate interests to ensure that any changes to our policies, terms and other such updates are communicated to you.

## **DISCLOSURE OF YOUR PERSONAL INFORMATION TO THIRD PARTIES**

We will not sell, rent, lease or otherwise share your personal information other than as outlined in this Privacy Policy or without obtaining your consent beforehand.

We will share your personal information with any member of our group of companies insofar as reasonably necessary for the purposes set out in this Privacy Policy.

Personal information will also be shared with our third party service providers and business partners who assist with the operation of our business, including our IT services providers. Our third party service providers and business partners are subject to security and confidentiality obligations and are only permitted to process your personal information for specified purposes and in accordance with our instructions.

In addition, we may disclose information about you:

- to third party agencies for the purposes of carrying out identity and fraud checks;
- to our professional advisers including lawyers, auditors and insurers;
- in the event that we sell or buy any business or assets, in which case we may disclose your personal information to the prospective seller or buyer of such business or assets;
- if all or substantially all of our assets (or the assets of one of the other companies in our group) are acquired by a third party, in which case personal information held by it about you will be one of the transferred assets;
- to fraud prevention agencies and credit reference agencies;
- to law enforcement, regulatory bodies or other competent authorities (such as the UK Financial Conduct Authority) as required by law or for the purposes of limiting fraud; or
- to enforce or apply our contracts or to establish, exercise or defend the rights of CAFL, its staff or other related persons.

## **INTERNATIONAL TRANSFERS**

Where we collect personal information from you, it may be necessary for us to transfer your personal information outside of the UK or the European Economic Area (“**EEA**”) to our service providers and business partners located outside the UK or the EEA.

Where personal information is transferred to and stored in a country not determined by the European Commission as providing adequate levels of protection for personal information, we take steps to provide appropriate safeguards to protect your personal information, including entering into standard contractual clauses approved by the UK or the European Commission, obliging recipients to protect your personal information.

If you would like further information on the specific mechanism used by us when transferring your personal information outside of the UK or the EEA, please contact us using the details set out in the “Contacting Us” section above.

## **SECURITY OF YOUR PERSONAL INFORMATION**

We use appropriate technical and organisational security measures to protect personal information from unauthorised use, loss, alteration or destruction. We use physical and procedural security measures to protect information from the point of collection to the point of destruction. Where data

processing is carried out on our behalf by a third party, we take steps to ensure that appropriate security measures are in place to prevent unauthorised disclosure of personal information.

## **HOW LONG WE KEEP YOUR PERSONAL INFORMATION**

We will only retain your personal information for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal information for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal information, we consider the amount, nature and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

## **YOUR RIGHTS**

### **ACCESS TO AND UPDATING YOUR PERSONAL INFORMATION**

You have the right to access information which we hold about you (“**data subject access request**”).

You may also have the right to receive personal information which you have provided to us in a structured and commonly used format so that it can be transferred to another data controller (“**data portability**”). The right to data portability only applies where your personal information is processed by us with your consent or for the performance of a contract and when processing is carried out by automated means.

### **RIGHT TO OBJECT**

#### *Direct marketing*

You have the right to object at any time to our processing of your personal information for direct marketing purposes.

#### *Where we process your information based on our legitimate interests*

You also have the right to object, on grounds relating to your particular situation, at any time to processing of your personal information which is based on our legitimate interests. Where you object on this ground, we shall no longer process your personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

## **YOUR OTHER RIGHTS**

You also have the following rights under data protection laws to request that we rectify your personal information which is inaccurate or incomplete. Please keep us informed if your personal information changes during your relationship with us.

In certain circumstances, you have the right to:

- request the erasure of your personal information: this enables you to ask us to delete or remove personal information where there is no good reason for us to continuing to process it (“**right to be forgotten**”); and
- restrict the processing of your personal information.

Please note that the above rights are not absolute and we may be entitled to refuse requests, wholly or partly, where exceptions under the applicable law apply.

For example, we may refuse a request for erasure of personal information where the processing is necessary to comply with a legal obligation or necessary for the establishment, exercise or defence of legal claims. We may refuse to comply with a request for restriction if the request is manifestly unfounded or excessive.

### **EXERCISING YOUR RIGHTS**

You can exercise any of your rights as described in this Privacy Policy and under data protection laws by contacting us as provided in the “Contacting Us” section above.

Save as described in this Privacy Policy or provided under data protection laws, there is no charge for the exercise of your legal rights. However, if your requests are manifestly unfounded or excessive, in particular because of their repetitive character, we may either: (a) charge a reasonable fee taking into account the administrative costs of providing the information or taking the action requested; or (b) refuse to act on the request.

Where we have reasonable doubts concerning the identity of the person making the request, we may request additional information necessary to confirm your identity.

### **COMPLAINTS**

If you have any questions or concerns regarding our Privacy Policy or practices, please contact us as provided in the “Contacting Us” section above. You also have the right to complain to the UK Information Commissioner’s Office (<https://ico.org.uk/>). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

### **CHANGES TO OUR PRIVACY POLICY**

We reserve the right to change this Privacy Policy from time to time. If we make any material changes to this Privacy Policy, we may notify you by email prior to the change becoming effective.