

PRIVACY POLICY

Abode Finance Ltd understands its obligations in regards to your fundamental right to a private life and has implemented systems and controls to ensure your rights and freedoms are protected.

Abode Finance Ltd undertakes to meet its obligations under the Data Protection Act, the Privacy and Electronic Communications Regulations and the EU General Data Protection Regulation (GDPR).

WHO WILL PROCESS YOUR PERSONAL INFORMATION?

Your personal information will be initially processed Abode Finance Ltd Your personal data will be further processed by On-Line Partnership Group Limited on behalf of its subsidiary company The On-Line Partnership Limited who acts as our Principal for regulatory purposes. All parties will process your personal data in accordance with this privacy notice.

WHY IS YOUR PERSONAL INFORMATION REQUIRED?

Your personal information is required to enable us to take necessary steps at your request prior to entering into a contract and to perform such a contract. This may include reviewing assets and liabilities, bank account validation, identity and age verification checks, credit checks, preventing and detecting fraud, money laundering or other crimes and any other requirements in accordance with rules set by the Financial Conduct Authority (FCA) or other applicable legislation.

WHAT HAPPENS IF WE WANT TO PROCESS YOUR INFORMATION FOR OTHER REASONS?

Though there are some legal exceptions, if we wish to process your personal data for any other unrelated purpose than those we have informed you about we will notify you.

WHAT ARE THE CONSEQUENCES IF YOU DO NOT PROVIDE YOUR PERSONAL INFORMATION?

Your personal data is essential to enable us to take steps at your request prior to entering into a contract or to perform a contract to which you are a party. Without this information we will not be able to proceed to provide any financial service.

WHAT MAKES THE PROCESSING LAWFUL?

Because the processing is necessary:

- For the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract;
- for compliance with a legal obligation to which we are subject;
- for the performance of a task carried out in the public interest;

- for the purposes of the legitimate interests pursued by us.

KEEPING YOUR INFORMATION UP TO DATE

We will record your information exactly as you provide it. You may ask us to update it at any time and we will action your request promptly and where possible notify relevant third parties of any changes.

WHAT ABOUT SENSITIVE PERSONAL DATA?

Unless we are processing because it is necessary for reasons of substantial public interest, we will only process sensitive personal data; such as data concerning health, racial or ethnic origin and criminal convictions or offences; with your explicit and informed consent for specific processing activities. In such cases you will be asked to sign a separate consent form to evidence this and that you understand the purpose(s) of the processing of such data. Your consent may be withdrawn at any time.

HOW WILL WE FURTHER USE YOUR PERSONAL INFORMATION (OUR LEGITIMATE INTERESTS)?

- To contact you to ensure that our records of your personal information are correct;
- To respond to questions or complaints you have about our services;
- To update you with changes in our terms;
- For statistical or research analysis relating to the performance of our business or that of our principal and understanding the changing needs of our clients;
- To review, improve and develop services we offer or handle complaints;
- To pursue debts or unpaid fees;
- To evidence company practices;
- To evidence the standards and processes carried out conform to the company's ethical standards and expectations;
- For direct marketing activities;
- To protect the business from risks which might be introduced by an individual.

You have the right to object to processing for these purposes and we shall cease unless we can show we have compelling legitimate grounds to continue.

PROCESSING WHEN PERFORMING A TASK CARRIED OUT IN THE PUBLIC INTEREST

We will use the information provided to protect members of the public against dishonesty, money laundering or fraudulent activities. This must necessarily be carried out without your explicit consent

to ensure this function is not prejudiced. Part of this processing involves verifying your identity using third parties such as GB Group Plc or Creditsafe Business Solutions Ltd.

WHAT INFORMATION IS REQUIRED?

We only collect information that is necessary to carry out the purposes listed above. This includes information you supply and data we receive from reference agencies. Where practical and lawful we will inform you about any personal data we receive about you from third parties that you may be unaware of.

HOW SECURE WILL YOUR DATA BE?

We will ensure that your data is only accessible to authorised people in our firm and will remain confidential at all times. Appropriate security measures will be in place to prevent unauthorised access, alteration, disclosure, loss, damage or destruction of your information. If we have a contract with another organisation to provide us with services or a service on our behalf to process your personal information, we'll make sure they give reassurances regarding appropriate security measures in place and only process your information in the way we've authorised them to. These organisations won't be entitled to use your personal information for their own purposes. If necessary, our security teams will check them to make sure they meet the security requirements we've set.

WILL WE SHARE YOUR INFORMATION WITH ANYONE ELSE?

We may share your information with:

- Appropriate staff such as those who carry out financial or compliance functions.
- Organisations that need your information because we are required to provide it by law (eg. The FCA, The Financial Ombudsman Service, HMRC, etc.).
- Organisations that carry out credit references or identity checks such as GB Group Plc or CreditSafe Business Solutions Ltd. These organisations may keep a record of the information and may disclose the fact that a search of its records was made to its other customers for the purposes of assessing the risk of giving credit, to prevent fraud and to trace debtors.
- Sometimes other authorised firms with specialist advisers, such as pension specialists, who assist us in providing suitable financial advice and services. You will be provided with their details if this applies.
- Law enforcement agencies, courts or other public authorities if we have to, or are authorised to by law.
- Product providers we use to provide financial services or for direct marketing (see below).

- Where we or our Principal go through a business transaction, such as a merger, being acquired by another company or selling a portion of its assets, your information will, in most instances, be part of the assets transferred.

TRANSFERRING DATA OUTSIDE THE EUROPEAN UNION

We do not usually transfer any of your personal data outside of the EU except when we need to perform pre-contractual measures (credit and identity checks) or because the checks we request are necessary for important reasons of public interest. Some companies, like Creditsafe Business Solutions Ltd, may transfer data outside of the EU to countries which do not, in the view of the EU Commission, offer an adequate level of protection. In such cases Creditsafe encrypts any data it sends to other agencies and only transfers information necessary to carry out checks.

(A list of countries used to perform checks include Germany, Netherland, Belgium, France, Sweden, Norway, Finland, Luxembourg, Switzerland, Liechtenstein, Spain, USA, Estonia, Latvia, Lithuania, Poland, Slovakia, Czech Republic, Hungary, Slovenia, Bosnia, Serbia, Montenegro, Croatia, Macedonia, Kosovo, Albania, Bulgaria, Romania, Ukraine, Austria, Denmark, Moldova, Portugal, Italy, Canada, Brazil, Greenland, China, India, Australia, Russia, South Korea, Taiwan, Mexico, South Africa, New Zealand, Hong Kong, UK.)

WHAT ABOUT DIRECT MARKETING?

We will use the information provided now and in the future to carry out direct marketing activities as these are legitimate interests pursued by us. Sometimes this includes, with your consent, sharing data with product providers for their marketing activities. You can choose which method you'd prefer us to use to contact you (by email, telephone, SMS or post) and **you have the right to object at any time** to the use of your personal data for this purpose and we will cease marketing activity. Just let us know about your preferences.

AUTOMATED DECISION-MAKING PROCESSES

We sometimes use automated processes when making decisions but you will not be subject to a decision based solely on automated processing, including profiling.

WHAT ABOUT COOKIES?

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide

information to the owners of the site. We use cookies when you log in, so you can use our service properly.

HOW DO I CHANGE MY COOKIE SETTINGS?

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.aboutcookies.org or www.allaboutcookies.org.

TYPES OF INFORMATION WE PROCESS

Information about you that we collect and use includes:

- Information about a person's identity such as their name, date of birth and contact details
- Information connected to a product or service.
- Information about your contact with us e.g. meetings, phone calls, emails / letters
- Information that is automatically collected e.g. via cookies when you visit one of our websites
- Information if you visit our office e.g. visual images collected via closed circuit television (CCTV)
- Information classified as 'sensitive' personal information e.g. relating to your health. This information will only be collected and used where it's needed to provide a product or service you have requested or to comply with our legal obligations in matters of employment.
- Information you may provide us about other people e.g. joint applicants or beneficiaries for products
- Information on children e.g. where a child is named as a beneficiary on the application for a policy taken out by a parent or guardian on their behalf. In these cases, we will collect and use only the information required to identify the child (such as their name, age, gender)

HOW DO WE COLLECT YOUR INFORMATION?

We may collect your personal information from a variety of ways, including:

- a telephone conversations with us
- emails or letters you send to us
- an application form for a product or service
- meetings with us
- registering for one of our events

- our websites or via our social media pages

HOW LONG WILL WE KEEP YOUR INFORMATION FOR?

The Financial Conduct Authority lays down rules relating to how long information should be held for and we will keep your information to meet these requirements. We will not keep your information for longer than is necessary.

REQUESTING A COPY OF THE INFORMATION WE HOLD

You may at any time ask for a copy of the information we hold about you – **it is your legal right**. We will provide you with a copy of any non-exempt personal information within one month unless we ask you for an extension of time. To protect your personal data, we will ask you to verify your identity before we release any information. We may refuse your request if we are unable to confirm your identity.

IMPORTANT RIGHTS

You have the right, on grounds relating to your situation, at any time to object to processing which is carried out as part of our legitimate interests or in the performance of a task carried out in the public interest. We will no longer process your data unless we can demonstrate there are compelling legitimate grounds which override your rights and freedoms or unless processing is necessary for the establishment, exercise or defence of legal claims.

You have the right to object at any time to processing your personal data for marketing activities. In such a case we must stop processing for this purpose.

WHAT ARE YOUR OTHER LEGAL RIGHTS?

In addition to the rights above the additional following rights:

- Where you have given consent, you have the right to withdraw previous consent to processing your personal data at any time;
- You have the right to request from us access to and rectification or erasure of personal data or restriction of processing concerning your data;
- You have the right to receive data you have provided to us in a structured, commonly used and machine readable format;
- You have the right to lodge a complaint with the regulator (see below).

To exercise any of these rights please contact us (details below).

HOW TO CONTACT OUR DATA PRIVACY OFFICER

You can contact our data privacy officer about any data protection or marketing issues by:

Writing to:

The Data Privacy Officer
Abode Finance Ltd
Unit 14a
City Business Centre,
Brighton Road,
Horsham,
RH13 5BB

Telephoning: 01403620948

Emailing: info@abodefinance.ltd

HOW DO YOU MAKE A COMPLAINT TO THE REGULATOR?

- By writing to:

**Information Commissioner's Office,
Wycliffe House,
Water Lane,
Wilmslow,
Cheshire,
SK9 5AF**

- By telephoning: **0303 123 1113**
- By emailing: **casework@ico.org.uk**
- By using their website:

<https://ico.org.uk/for-organisations/report-a-breach/>