



## PRIVACY NOTICE

### Why are we asking you to read this document?

During the course of dealing with us, we will ask you to provide us with detailed personal information relating to your existing circumstances, your financial situation and, in some cases, your health and family health history (Your Information).

We would like to explain to you what we will need to do with Your Information, and the various rights you have in relation to Your Information.

### What do we mean by “Your Information”?

Your Information means any information describing or relating to you. Your Information may identify you directly, for example, your name, address, date of birth, National Insurance number and the like.

Your Information may also identify you indirectly, for example, your employment situation, your physical and mental health history, or any other information that could be associated with your cultural or social identity.

In the context of providing you with assistance in relation to your funding requirements Your Information may include:

- Title, names, date of birth, gender, nationality, civil/marital status, contact details, addresses and documents that are necessary to verify your identity
- Employment and remuneration information, (including salary/bonus schemes / overtime / sick pay / other benefits), employment history
- Bank account details, tax information, financial accounts, loans and credit commitments, personal and business credit history, sources of income and expenditure, family circumstances and details of dependents
- Health status and history, details of treatment and prognosis, medical reports (further details are provided below specifically with regard to the processing we may undertake in relation to this type of information)
- Any pre-existing funding products and the terms and conditions relating to these
- IP addresses, cookies, MAC addresses, GEO location data, browser version

### The basis upon which our Firm will deal with Your Information

-When we speak with you about your funding requirements, we do so on the basis that a **contract for the supply of services** is in place between us. To perform that contract, and to arrange the products you require, we have the right to use Your Information for the purposes we set out below.

-Alternatively, either in the course of initial discussions with you or when the contract between us has come to an end for whatever reason, we have the right to use Your Information provided it is in our **legitimate business interest to do so and your rights are not affected**. For example, we may need to respond to requests and our Firm may contact you to seek feedback on the service you received.

- On occasion, we will use Your Information to enable us to meet compliance with the legal or regulatory obligation to which we might be subject. If this were to arise, we would be processing Your Information in order to meet **a legal, compliance or other regulatory obligation to which we are subject.**

-This includes sharing Your Information with all applicable regulators such as the Financial Conduct Authority (FCA) and the Information Commissioner.

### **The basis upon which we will process certain parts of Your Information**

Your Special Data and any Criminal Disclosures will be used by us in the same way as Your Information generally, as set out in this Customer Privacy Notice.

When we refer in the remainder of this document to Your Information this includes Your Special Data and Criminal Disclosures.

### **How do we collect Your Information?**

We will collect and record Your Information from a variety of sources, but mainly directly from you.

You will usually provide information during our initial meetings or conversations with you to establish your circumstances and needs and preferences in relation to funding

You will provide information to us verbally and in writing, including email and any online facilities that may be made available to you.

We may also obtain some information from third parties, for example, credit checks, information from your employer, and searches of information in the public domain such as the voters roll. If we use technology solutions to assist in the collection of Your Information, such as software that is able to verify your identity online or to access your credit status and/or bank account entries, then you will be required to provide your consent for us or our nominated processor to access your information in this manner, and details of how such software operates will be provided to you prior to the activation of the service.

### **What happens to Your Information when it is disclosed to us?**

During handling Your Information, we will:

-record and store Your Information in our paper files, mobile devices and on our computer systems (websites, email, hard drives, cloud facilities) and it will be accessed by employees and consultants within, or contractors engaged, by our Firm as necessary to provide our service to you and to perform any administration tasks associated with or incidental to that service

-submit Your Information to funders, both in paper form and online via their systems, to progress any enquiry or application made on your behalf and to deal with any additional questions or administrative issues that funders may raise

-input Your Information, along with full details of the funding, discussed with you or which you have taken out, if applicable to our computer systems

-use Your Information for the purposes of responding to any queries you may have in relation to any funding you may take out, or to inform you of any developments in relation to the products and/or policies of which we might become aware

-use, and where appropriate transmit, Your Information to respond to any request from the FCA, the Financial Ombudsman Service, HMRC, the Office of the Information Commissioner or any other regulatory, law enforcement or governmental body

## Sharing and transferring Your Information

From time to time Your Information will be shared with or transferred to:

-to funders providers

-third parties who we believe will be able to assist us with your enquiry or application, or who are able to support your needs as identified, such third parties will include but may not be limited to, product specialists, estate agents, providers of legal services such as conveyancing, surveyors, and valuers (in each case where we believe this to be required due to your circumstances)

-contractors or suppliers who we may engage to assist us with any customer feedback exercises

-our professional indemnity insurers, brokers, claims handlers and legal advisers and another person who may provide professional services in connection with the handling of a complaint, litigation, or investigation

-any person we may engage in connection with any investigation to detect, prevent or investigate financial crime, including those that may be carried out by or in conjunction with funders and regulators

-contractors or suppliers who we may engage with to assist us with discharging our compliance obligations arising out of FCA regulation

in each case for the purposes set out in this customer privacy notice, i.e., to progress your funding enquiry and to provide you with our professional services.

**Please note that this sharing of Your Information does not entitle such third parties to send you marketing or promotional messages: it is shared for the purpose of ensuring we can adequately fulfil our responsibilities to you, and as otherwise set out in this Customer Privacy Notice.**

We do not envisage that the performance by us of our service will involve Your Information being transferred outside of the European Economic Area.

## Security and retention of Your Information

-Your privacy is important to us, and we will keep Your Information secure in accordance with our legal responsibilities. We will take reasonable steps to safeguard against Your Information being accessed unlawfully or maliciously by a third party, accidentally lost, destroyed, or damaged.

-We also expect you to take reasonable steps to safeguard your own privacy when transferring information to us, such as not sending confidential information over unprotected email, ensuring email attachments are password protected or encrypted and only using secure methods of postage when original documentation is sent to us.

-Your information will be retained by us either electronically or in paper format for a minimum of six years. We have the responsibility to ensure the suitability of advice or recommendations provided to you and to respond to and investigate any complaint you may make.

-The rules and regulations of the FCA do not generally provide for any automatic time bar after which you would be prevented from making a complaint to us. We will, therefore, keep a record of products and services that have been provided to you for as long as we consider reasonably necessary to be able to discharge our obligations to you.

## **Your rights in relation to Your Information**

### **You can:**

- request copies of Your Information that is under our control
- ask us to further explain how we use Your Information
- ask us to correct, delete or require us to restrict or stop using Your Information (details as to the extent to which we can do this will be provided at the time of any such request)
- ask us to send an electronic copy of Your Information to another organisation should you wish
- change the basis of any consent you may have provided to enable us to market to you in the future (including withdrawing any consent in its entirety)

### **How to contact our Firm in relation to the use of Your Information**

**If you have any questions or comments about this document or wish to make contact in order to exercise any of your rights set out within it please contact:**

**Martin Howe at Busy Bee Commercial Finance Ltd at 13 Creden Avenue, Manchester, M22 5DB**

**T: 0161 399 1946**

**E: [funding@busybeecommercialfinance.co.uk](mailto:funding@busybeecommercialfinance.co.uk)**

If we feel we have a legal right not to deal with your request, or to action it in a different way to how you have requested, we will inform you of this at the time.

You should also contact us as soon as possible on you becoming aware of any unauthorised disclosure of Your Information, so that we may investigate and fulfil our own regulatory obligations.

If you have any concerns or complaints as to how we have handled Your Information or Your Special Data/Criminal Disclosures you may lodge a complaint with the UK's data protection regulator, the ICO, who can be contacted through their website at <https://ico.org.uk/global/contact-us/> or by writing to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.