IDEATE FINANCE

EMPIRE FINANCE

CUSTOMER PRIVACY NOTICE

WHY SHOULD YOU 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 Personal Data).** This document is important as it allows us to explain to you what we will need to do with Your Personal Data, and the various rights you have in relation to Your Personal Data.

WHAT DO WE MEAN BY "YOUR PERSONAL DATA"?

Your Personal Data means any information that describes or relates to your personal circumstances. Your Personal Data may identify you directly, for example your name, address, date or birth, National Insurance number. Your Personal Data 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 Finance requirements, Your Personal Data 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, loans and credit commitments, personal 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 finance products and the terms and conditions relating to these

SPECIAL CATEGORIES OF PERSONAL DATA

Certain data is classified under the Regulation as" special categories":

- Racial, Ethnic origin, Political Opinions, Religious Beliefs, Trade-union membership, Genetic Data, Biometric Data, Health Data, Data concerning a natural person's sex life, Sexual orientation, Other.

Consent is required for **Empire Finance Limited and Ideate Finance Limited** to process **both** types of personal data, but it must be explicitly given. Where we are asking you for sensitive personal data, we will always tell you why and how the information will be used.

THE BASIS UPON WHICH OUR FIRM WILL DEAL WITH YOUR PERSONAL DATA

When we speak with you about your finance requirements, we do so on the basis that both parties are entering a contract for the supply of services.
In order to perform that contract, and to arrange the products you require, we have the right to use Your Personal Data for the purposes detailed 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 Personal Data 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 from lenders, and our Compliance Service Provider relating to the advice we have given to you, or to make contact with you to seek feedback on the service you received.

On occasion, we will use Your Personal data for contractual responsibilities we may owe our regulator The Financial Conduct Authority, or for wider compliance with any legal or regulatory obligation to which we might be subject. In such circumstances, we would be processing Your Personal Data in order to meet a legal, compliance or other regulatory obligation to which we are subject.

***THE BASIS UPON WHICH WE WILL PROCESS CERTAIN PARTS OF YOUR PERSONAL DATA**

In asking us to assist you with your finance needs, we **may** need to ask you information in relation to **Your Special Data**. We will record and use Your Special Data in order to assist with enquiries of lenders in relation to their products and to provide you with advice/guidance regarding the suitability of any product that may be available to you.

We will use special Data and any Criminal Disclosures in the same way as Your Personal Data generally, as set out in this Privacy Notice.

Information on Special Category Data and Criminal Disclosures must be capable of being exchanged freely between Broker intermediaries such as our Firm, and Lenders to enable customers to secure the Lending that their needs require.

HOW DO WE COLLECT YOUR PERSONAL DATA?

We will collect and record Your Personal Data from a variety of sources, but mainly directly from you. You will usually provide information during the course of our initial meetings or conversations with you to establish your circumstances and needs and preferences in relation to finance. You will provide information to us verbally and in writing, including email.

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 Personal Data for example software that is able to verify your credit status. We will only do this if we have consent from you for us or our nominated processor to access your information in this manner. With regards to electronic ID checks we would not require your consent but will inform you of how such software operates and the purpose for which it is used.

WHAT HAPPENS TO YOUR PERSONAL DATA WHEN IT IS DISCLOSED TO US?

In the course of handling Your Personal Data, we will:

- Record and store Your Personal Data in our paper files, mobile devices and on our computer systems i.e. email, hard drives, and cloud facilities. This information can only be accessed by employees and consultants within our Firm and only when it is necessary to provide our service to you and to perform any administration tasks associated with or incidental to that service

- Use Your Personal Data for the purposes of assisting in responding to any queries you may have in relation to any finance product you may take out, or to inform you of any developments in relation to those products of which we might become aware

SHARING YOUR PERSONAL DATA

From time to time Your Personal Data will be shared with:

- Finance lenders

- 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. These third parties will include but may not be limited to, our Compliance Advisers, Product specialists, providers of legal services such as Solicitors, estate planners, conveyancing, surveyors and valuers (in each case where we believe this to be required due to your particular circumstances).

In each case, your Personal Data will only be shared for the purposes set out in this customer privacy notice, i.e., to progress your finance requirements enquiry and to provide you with our professional services.

Please note that this sharing of Your Personal Data **does not** entitle such third parties to send you marketing or promotional messages: it is shared to ensure 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 PERSONAL DATA BEING TRANSFERRED OUTSIDE OF THE EUROPEAN ECONOMIC AREA.

SECURITY AND RETENTION OF YOUR PERSONAL DATA

Your privacy is important to us and we will keep Your Personal Data secure in accordance with our legal responsibilities. We will take reasonable steps to safeguard Your Personal Data against it being accessed unlawfully or maliciously by a third party.

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 being sent to us.

Your Personal Data will be retained by us either electronically or in paper format for a minimum of six years, or in instances whereby we have legal right to such information we will retain records indefinitely.

YOUR RIGHTS IN RELATION TO YOUR PERSONAL DATA

You can:

- Request copies of Your Personal Data that is under our control

- Ask us to further explain how we use Your Personal Data

- Ask us to correct, delete or require us to restrict or stop using Your Personal Data (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 Personal Data 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 MAKE CONTACT WITH OUR FIRM IN RELATION TO THE USE OF YOUR PERSONAL DATA

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:

The Compliance Team at Empire Finance Limited, Burnaby House, 3 Mountsorrel Lane, Rothley, Leicestershire, LE7 7PS.

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

You should also make contact with us as soon as possible on you becoming aware of any unauthorised disclosure of Your Personal Data, 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 Personal Data 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.