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## PRIVACY POLICY

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### Introduction

This Privacy Policy is to inform you how Credit & Business Finance, a limited company registered in England under company number 04000171, whose registered address is Allen House, The Maltings, Station Road, Sawbridgeworth, Herts CM21 9JX looks after your personal information. This includes any information you tell us about yourself, information we gain from having you as a customer and what marketing preferences you choose to receive. This Privacy Policy also tells you about your privacy rights and how the law protects you.

### 1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

<b>“Account”</b>	means an account required to access and/or use certain areas and features of Our Site;
<b>“Cookie”</b>	means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in section 5, below;
<b>“Cookie Law”</b>	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;
<b>“personal data”</b>	means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to Us via Our Site and other sources as detailed in section 9.2.2. This definition shall, where applicable, incorporate the definitions provided in the General Data Protection Regulation (“GDPR”).

### 2. Information

2.1 This section tells you about us

2.1.1 Our Site is owned and operated by Credit & Business Finance Ltd (CBF), registered in England under company number 04000171, whose registered address is Allen House, The Maltings, Station Road, Sawbridgeworth, Herts CM21 9JX

2.1.2 Our VAT number is 870708610

2.1.3 Our Data Compliance Officer is Hannah Haslam, who can be contacted by email at [privacy@cbfb.co.uk](mailto:privacy@cbfb.co.uk), by telephone on 01279 722555, or by post at Credit & Business Finance Ltd, Allen House, The Maltings, Station Road, Sawbridgeworth, Herts, CM21 9JX

2.1.4 We are registered with the Information Commissioners Office (ICO) [www.ico.org.uk](http://www.ico.org.uk) as a Data Controller and Data Processor. Our data protection registration number is ZA089567

2.1.5 The ICO regulates data protection in the UK and you can find out more about your rights here <https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/>

2.1.6 We are regulated by the Financial Conduct Authority (FCA).

### 3. **CBF Website**

3.1 CBF is the controller and responsible for your personal data (referred to in this policy as 'we', 'us', 'our'). We respect and value the privacy of everyone who visits this website, cbfb.co.uk ("Our Site") and will only collect and use personal data in ways that are described here, and in a manner, that is consistent with Our obligations and your rights under the law.

3.2 Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of Our Privacy Policy is deemed to occur upon your first use of Our Site. If you do not accept and agree with this Privacy Policy, you must stop using Our Site immediately.

3.3 Visitors to the website

3.3.1 Our Site may contain links to other websites. Please note that We have no control over how your data is collected, stored, or used by other websites and We advise you to check the privacy policies of any such websites before providing any data to them.

3.4 Website Security and performance

3.4.1 CBF uses a third-party service to help maintain the security and performance of the CBF website.

3.5 'Contact Us' webpage

3.5.1 If you use our 'Contact Us' webpage we will receive an email which contains your name, email address, company name, phone number, company turnover and the contents within the 'your message' field. This information will not be shared with any other organisations.

### 4. **What Data Do We Collect?**

Depending upon your use of Our Site, We may collect some or all of the following personal and non-personal data (please also see Our Cookie Policy in section 5 below on Our use of Cookies and similar technologies):

4.1 name;

4.2 business/company name;

4.3 contact information such as email addresses and telephone numbers;

4.4 financial information such as Company Turnover;

### 5. **Cookie Policy and Our Use of Cookies**

5.1 Our Site may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by Us and are used only by Us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve Our services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

5.2 All Cookies used by and on Our Site are used in accordance with current Cookie Law.

5.3 Before Cookies are placed on your computer or device, you will be shown a pop-up requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling Us to provide the best possible

experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Site may not function fully or as intended. You will be given the opportunity to allow only first party Cookies and block third party Cookies.

5.4 Certain features of Our Site depend on Cookies to function. Cookie Law deems these Cookies to be “strictly necessary”. These Cookies are shown below in section 5.5. Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser’s settings as detailed below in section 5.9, but please be aware that Our Site may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.

5.5 The following first party Cookies may be placed on your computer or device:

<b>Name of Cookie</b>	<b>Purpose</b>	<b>Strictly Necessary</b>
PHPSESSID	Site session	Yes
ms-uid	Site session	Yes

5.6 Our Site uses analytics services provided by Google. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling Us to better understand how Our Site is used. This, in turn, enables Us to improve Our Site and the services offered through it. You do not have to allow Us to use these Cookies, however whilst Our use of them does not pose any risk to your privacy or your safe use of Our Site, it does enable Us to continually improve Our Site, making it a better and more useful experience for you.

5.7 The analytics service(s) used by Our Site use(s) Cookies to gather the required information.

5.8 The analytics service(s) used by Our Site use(s) the following Cookies:

_ga	2 years	Used to distinguish users.
_gid	24 hours	Used to distinguish users.
_gat	1 minute	Used to throttle request rate. If Google Analytics is deployed via Google Tag Manager, this cookie will be named _dc_gtm_<property-id>.

__utma	2 years from set/update	Used to distinguish users and sessions. The cookie is created when the javascript library executes and no existing __utma cookies exists. The cookie is updated every time data is sent to Google Analytics.
__utmt	10 minutes	Used to throttle request rate.
__utmb	30 mins from set/update	Used to determine new sessions/visits. The cookie is

		created when the javascript library executes and no existing __utmb cookies exists. The cookie is updated every time data is sent to Google Analytics.
__utmc	End of browser session	Not used in ga.js. Set for interoperability with urchin.js. Historically, this cookie operated in conjunction with the __utmb cookie to determine whether the user was in a new session/visit.
__utmz	6 months from set/update	Stores the traffic source or campaign that explains how the user reached your site. The cookie is created when the javascript library executes and is updated every time data is sent to Google Analytics.
__utmv	2 years from set/update	Used to store visitor-level custom variable data. This cookie is created when a developer uses the <code>_setCustomVar</code> method with a visitor level custom variable. This cookie was also used for the deprecated <code>_setVar</code> method. The cookie is updated every time data is sent to Google Analytics.

- 5.9 In addition to the controls that We provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third-party cookies. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.
- 5.10 You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.
- 5.11 It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

## 6. How Do We Use Your Data?

- 6.1 All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with Our obligations and safeguard your rights under the GDPR at all times. For more details on security see section 9, below.
- 6.2 Our use of your personal data will always have a lawful basis, either because it is necessary for Our performance of a contract or agreement with you, because you have consented to Our use of your personal data (e.g. by subscribing to emails), or because it is in Our legitimate interests (see section 7 below). Specifically, We may use your data for the following purposes:
- 6.2.1 Providing and managing your Account;

- 6.2.2 Providing and managing your access to Our Site;
- 6.2.3 Supplying Our services to you (please note that We require your personal data in order to enter into a contract or agreement with you);
- 6.2.4 Replying to emails from you;
- 6.2.5 Supplying you with emails (you may unsubscribe or opt-out of any marketing emails at any time - see section 14.3 for details of how to opt out);

## 7. Lawful Basis

- 7.1 Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by Contacting Us, see section 18.1.1.
- 7.2 Performance of Contract means processing your data where it is necessary for the performance of a contract or agreement to which you are a party or to take steps at your request before entering into such a contract or agreement.
- 7.3 Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

## 8. Your Rights

- 8.1 As a data subject, you have the following rights under the GDPR, which this Policy and Our use of personal data have been designed to uphold:
  - 8.1.1 The right to be informed about Our collection and use of personal data;
  - 8.1.2 The right of access to the personal data We hold about you (see section 12);
  - 8.1.3 The right to rectification if any personal data We hold about you is inaccurate or incomplete (please contact Us using the details in section 18.1.1);
  - 8.1.4 The right to be forgotten – i.e. the right to ask Us to delete any personal data We hold about you (We only hold your personal data for a limited time, as explained in section 6 but if you would like Us to delete it sooner, please contact Us using the details in section 18.1.1);
  - 8.1.5 The right to restrict (i.e. prevent) the processing of your personal data;
  - 8.1.6 The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);
  - 8.1.7 The right to object to Us using your personal data for particular purposes; and
  - 8.1.8 Rights with respect to automated decision making and profiling.
- 8.2 If you have any cause for complaint about Our use of your personal data, please contact Us using the details provided in section 18.1.1 and We will do

Our best to solve the problem for you. If We are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office.

- 8.3 For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau.
- 8.4 With your permission and/or where permitted by law, We may also use your data for marketing purposes which may include contacting you by email, telephone, post with information, news and offers on Our products and services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that We fully protect your rights and comply with Our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003. (see section 14 for further information).
- 8.5 You have the right to withdraw your consent to Us using your personal data at any time, and to request that We delete it.
- 8.6 We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected.
- 8.7 Data will therefore be retained for the following periods (or its retention will be determined on the following bases):
  - 8.7.1 If you stop being a customer we may keep your data for up to 10 years for the following reasons:
    - 8.7.1.1 To respond to a question, claim or complaint or to show we acted fairly and reasonably
    - 8.7.1.2 To study client data as part of our own internal research
    - 8.7.1.3 To follow rules that apply to us about keeping records
    - 8.7.1.4 We may also keep your data for longer than 10 years if we cannot delete it for legal, regulatory or technical reasons. As an example, we have to hold pension transfer information indefinitely;

## 9. **How And Where Do We Store Your Data?**

- 9.1 Your data will only be stored in the UK and the European Economic Area.
- 9.2 Data security is very important to us, and to protect your data we have taken suitable measures to safeguard and secure data collected from:
  - 9.2.1 Our Website;
    - 9.2.1.1 We take steps to protect your data including maintaining strict security measures to secure and keep safe your personal information, such as internal and external firewalls, monitoring and alert systems to prevent and identify attempted intrusion, and the encryption of data during transit. Our servers are stored securely with access limited to authorised personnel only. Our employees access data through secure interfaces, and our online interfaces are encrypted, password protected and monitored.
  - 9.2.2 The sources below;
    - 9.2.2.1 When you apply for the services we offer
    - 9.2.2.2 When you talk to Us on the phone, including recorded calls,

face to face conversation and notes we make

9.2.2.3 Mobile device apps or web chat

9.2.2.4 Letters and emails

9.2.2.5 Insurance claims and other relevant documents.

9.2.3 Outside Organisations;

9.2.3.1 Companies that introduce you to us

9.2.3.2 Insurers

9.2.3.3 Other financial services companies (to help prevent, detect and prosecute unlawful acts and fraudulent behaviour)

9.2.3.4 Employers (for instance, to get a reference)

9.2.3.5 Public information sources such as Companies House and Credit Reference Agencies

9.2.3.6 Agents, suppliers, sub-contractors and advisers. These can be types of firms we use to help us run accounts and services. They can also be specialist companies who advise us on ways to develop and improve our business.

9.2.4 Our landlord provides a secure infrastructure where access to our premises is monitored and can be restricted. Our servers and offices, including personal information in hard copy form, are kept locked in secure environments.

9.2.5 Our employees have undergone security and privacy training. We restrict access to your personal information to Directors, Line Managers and those employees who need it to perform their work functions. Our Human Resources, Account Management, Finance, and Compliance teams may, during their duties, require access to your information and employees in other departments may access it occasionally as required to provide services, communicate with you and fulfill our legal obligations.

9.2.6 We also enter into contractual agreements with service providers with which we may need to share your personal information, which require them to protect your personal information to the same level as we do, and allow us to audit their compliance with those obligations.

## 10. **Do We Share Your Data?**

10.1 We may share your personal information with outside organisations in order to effectively achieve the running of our business and obey rules that apply to Us. The list below shows the type of organisations we may share your personal information with:

10.1.1 HM Revenue & Customs

10.1.2 Insurers

10.1.3 Regulators

10.1.4 Other Tax Authorities

10.2 We share personal information with insurance industry companies in order to set up insurance policies on your behalf, to enable processing of claims and to

help reduce fraud. We do that in these ways:

10.2.1 If you apply for insurance through us, we will pass your personal or business details to the insurer

10.2.2 If you make an insurance claim, personal or business information you pass to us will be shared with the insurer.

10.2.3 In some cases we may also share it with our business partners if you have a relationship with them.

10.3 In certain circumstances, We may be legally required to share certain data held by Us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with legal requirements, a court order, or a governmental authority.

## 11. **Your Right to Withhold Information**

11.1 You may access certain areas of Our Site without providing any data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.

11.2 You may restrict Our use of Cookies. For more information, see section 5 and Our Cookie Policy.

## 12. **How Can You Access Your Data?**

12.1 You have the right to ask for a copy of any of your personal data held by Us (where such data is held). Under the GDPR, no fee is payable and We will provide any and all information in response to your request free of charge, without delay, and within one month of receipt of the request. Please contact Us for more details at [privacy@cbfb.co.uk](mailto:privacy@cbfb.co.uk), or using the contact details below in section 18.1.1.

## 13. **Email**

13.1 Our emails sent and received via Microsoft Office 365 are encrypted in transit and when stored in Microsoft Data Centres.

13.2 We are careful to monitor all emails we receive, including file attachments, for viruses or malicious software. Please be mindful of your responsibility to ensure that any email you send is within the bounds of the law.

## 14. **Marketing Communications**

### 14.1 Prospects

14.1.1 Our primary market is Business to Business therefore CBF will only email, call or direct mail prospects where there is either evidenced consent or where there is a legitimate interest to do so. Where legitimate interest is considered the grounds for processing, an assessment shall be made to ensure that this legitimate interest is valid and that this interest does not outweigh an individual's right to privacy.

14.1.2 Where promoting our services, we purchase records of Company information containing business contacts. We have an in-house profiling/cleansing procedure which allows us to identify records within our target audience. Our data will only be purchased from credible sources (i.e. Credit Reference Agencies) who can provide sufficient assurances that they are meeting their data protection obligations. We



may also gather information from other publicly available sources to ensure that our records are accurate.

14.1.3 We do not sell the information we have about you to any third party.

#### 14.2 Clients/Introducers/Insurers

14.2.1 Our primary market is Business to Business therefore CBF will only email, call or direct mail where there is either evidenced consent, where there is a legitimate interest to do so or where we have a lawful basis to communicate.

14.2.2 We do not sell the information we have about you to any third party.

#### 14.3 Opting Out

14.3.1 You can ask us to stop sending you marketing information at any time by clicking on the 'unsubscribe' button and following the opt-out/marketing preference links on the next e-communication you receive or by contacting us directly.

14.3.2 If you are a CBF client, if you have opted out of receiving marketing material, this will not apply to personal data provided to us which forms part of a contract for services you have with us. We will continue to process such data in accordance with this Privacy Policy and within the bounds of the law.

#### 14.4 E-newsletter

14.4.1 We use a third-party e-newsletter platform to deliver our quarterly e-newsletters. We gather statistics around email opening, clicks, location and operating system using industry standard technologies to help us monitor and improve our e-newsletter and Point 6.2 applies.

### 15. **What Happens If Our Business Changes Hands?**

15.1 We may, from time to time, expand or reduce Our business and this may involve the sale and/or the transfer of control of all or part of Our business. Any personal data that you have provided will be shared with the third-party buyer and their advisers. This is in the legitimate interests of selling or expanding our business. Any personal data that is relevant to any part of Our business that is being transferred, the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use that data only for the same purposes for which it was originally collected by Us.

### 16. **Job applicants, current and former Credit & Business Finance Ltd employees**

16.1 CBF is the data controller for the information you provide during the process unless otherwise stated. Please contact Hannah Haslam using the contact details in section 18.1.1 if you require a copy of our Recruitment Privacy Policy, or have any queries about the process, or how we handle your information.

16.2 What will we do with the information you provide to us?

16.2.1 All information you provide during the application process will only be used for the purpose of progressing your application, or to fulfil legal or regulatory requirements if necessary.

16.2.2 We will not share any of the information you provide during Our internal recruitment process with any third parties for marketing purposes. Data

sent electronically or processed beyond the initial application will be stored within the European Economic Area by our third-party processors – all processors have appropriate levels of security and organisational controls to meet data protection requirements. The information you provide will be held securely by us and/or our data processors whether the information is in electronic or physical format. We will use the contact details you provide to us to contact you to progress your application. We will use the other information you provide to assess your suitability for the role you have applied for.

### 16.3 What information do we ask for, and why?

16.3.1 We do not collect more information than we need to fulfil our stated purposes and will not retain it for longer than is necessary.

16.3.2 The information we ask for is used to assess your suitability for employment. You don't have to provide what we ask for, but it might affect your application if you don't.

### 16.4 Application stage

16.4.1 Applications may be received via electronic sources, for example email, physically by post or through a third-party recruitment agency. We may ask you for your personal details including name and contact details. We will also ask you about your previous experience, education, referees and for answers to questions relevant to the role you have applied for. Our Human Resources Manager will have access to this information.

### 16.5 Shortlisting

16.5.1 Our hiring managers shortlist applications for interview. They will not be provided with your name or contact details.

### 16.6 Assessments

16.6.1 We might ask you to participate in assessment days; complete tests or occupational personality profile questionnaires; and/or to attend an interview – or a combination of these. Information will be generated by you and by us. For example, you might complete a written test, or we might take interview notes. This information is held by Credit & Business Finance Ltd.

16.6.2 If you are unsuccessful following assessment for the position you have applied for, we may retain your details in our talent pool for a period of up to two years.

### 16.7 Conditional offer

16.7.1 If we make a conditional offer of employment we will ask you for information so that we can carry out pre-employment checks. You must successfully complete pre-employment checks to progress to a final offer. We are required to confirm the identity of our staff, their right to work in the United Kingdom and seek assurance as to their trustworthiness, integrity and reliability.

16.7.2 You will therefore be required to provide:

Proof of your identity – you will be asked to attend our office with

original documents, we will take copies.

Proof of your qualifications – you may be asked to attend our office with original documents, we will take copies.

You will be asked to complete a criminal records declaration to declare any unspent convictions.

We will contact your referees, using the details you provide in your application, directly to obtain references

We will also ask you to complete a questionnaire about your health. This is to establish your fitness to work.

16.8 If we make a final offer, we will also ask you for the following:

16.8.1 Bank details – to process salary payments

16.8.2 Emergency contact details – so we know who to contact in case you have an emergency at work

16.9 Data Retention Policy - How long is the information retained for?

16.9.1 If you are successful, the information you provide during the application process will be retained by us as part of your employee file for the duration of your employment plus 7 years following the end of your employment. This includes your criminal records declaration, fitness to work, records of any security checks and references. If you are unsuccessful at any stage of the process, your CV shall be retained for up to 24 months and any other information you have provided until that point will be retained for 6 months from the closure of the campaign. If you would prefer us to delete your CV, please let us know by contacting the Data Compliance Officer on the details in section 18.1.1.

16.9.2 Information generated throughout the assessment process, for example interview notes, is retained by us for 6 months following the closure of the campaign.

16.9.3 Equal opportunities information is retained for 6 months following the closure of the campaign whether you are successful or not.

16.9.4 When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

16.10 Your rights

16.10.1 Under data protection legislation, you have rights as an individual which you can exercise in relation to the information we hold about you.

16.10.2 You can read more about these rights here – <https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/>

16.11 Automated decision-making

16.11.1 We do not make automated decisions

## 16.12 Complaints or queries

16.12.1 CBF tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

16.12.2 This privacy notice does not provide exhaustive detail of all aspects of CBF's collection and use of personal information. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the address in section 18.1.1.

16.12.3 If you want to make a complaint about the way we have processed your personal information, you can contact the Information Commissioner's Office in their capacity as the statutory body which oversees data protection law – [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns).

## 16.13 Access to Personal information

16.13.1 CBF tries to be as open as it can be in terms of giving people access to their personal information. Individuals can find out if we hold any personal information by making a 'subject access request'. If we do hold information about you we will:

16.13.2 give you a description of it;

16.13.3 tell you why we are holding it;

16.13.4 tell you who it could be disclosed to; and

16.13.5 let you have a copy of the information in an intelligible form.

16.14 To make a request to CBF for any personal information we may hold you need to put the request in writing to the address provided in section 18.1.1.

16.15 If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone.

16.16 If we do hold information about you, you can ask us to correct any mistakes by, once again, contacting the Data Compliance Officer.

## 16.17 Disclosure of personal information

16.17.1 In many circumstances we will not disclose personal data without consent, unless legally obliged to or as part of contractual obligations with our customers (where you are a party to the agreement or service).

16.17.2 We may disclose your personal information to the following categories of recipients:

16.17.2.1 to third party service providers and partners who provide data processing services to us (for example, to support the delivery of, provide functionality on, or help to enhance the security of our Website), or who otherwise process personal information for purposes that are described in this Privacy Policy or notified to you when we collect your personal

information.

- 16.17.2.2 to any competent law enforcement body, regulatory, government agency, court or other third party where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person;
- 16.17.2.3 to a potential buyer (and its agents and advisers) in connection with any proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Privacy Policy;
- 16.17.2.4 to enforce or apply our Terms of Service or other agreements or to protect CBF and its customers (including with other companies and organisations for the purposes of fraud protection and credit risk reduction);
- 16.17.2.5 to any other person with your consent to the disclosure.

#### 16.18 Legal basis for processing personal information

- 16.18.1 If you are a visitor from the European Economic Area, our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it
- 16.18.2 However, we will normally collect personal information from you only where we have your consent to do so, where we need the personal information to perform a contract with/involving you, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect personal information from you or may otherwise need the personal information to protect your vital interests or those of another person.
- 16.18.3 If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).
- 16.18.4 Similarly, if we collect and use your personal information in reliance on our legitimate interests (or those of any third party), we will make clear to you at the relevant time what those legitimate interests are.
- 16.18.5 If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided under the “contacting us” heading below.

### 17. Changes to Our Privacy Policy

- 17.1.1 We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations.

We recommend that you check this page regularly to keep up-to-date. This Policy was last updated on 18<sup>th</sup> May 2018.

## 18. **Contacting Us**

18.1.1 If you have any questions about Our Site or this Privacy Policy, please contact Us ensuring your query is clear, particularly if it is a request for information about the data We hold about you (as under section 12, above). You can contact us by email at [privacy@cbfb.co.uk](mailto:privacy@cbfb.co.uk), by telephone on 01279 722555, or by post to the Data Compliance Officer, Credit & Business Finance Ltd, Allen House, The Maltings, Station Road, Sawbridgeworth, Herts, CM21 9JX.