

EXCEL FINANCIAL SERVICES LTD

PRIVACY POLICY

Introduction

We take your privacy seriously and this policy explains more about your privacy rights and how we gather, use and share your personal information.

We are a 'Data Controller'. This is a legal term which means that we make decisions about how and why we use your personal data. As a 'Data Controller', we are responsible for making sure that your personal data is used in accordance with applicable data protection laws.

If you have any questions about how we use your personal information, our Data Protection Officer (DPO) can be contacted by email at admin@excelfs.co.uk or by post to Data Protection Officer, Excel Financial Services Ltd, Unit 2a Stoneacre, Grimbald Crag Close, Knaresborough, HG5 8PJ.

The types of personal data we collect and use

This will depend on the products and services you require and is in respect of all the personal and financial information about you that we collect, use, share and store. The personal data may include:

- Full name and personal details including contact information (e.g. home address and address history, email address, home and mobile telephone numbers)
- Date of birth and/or age (e.g. to check eligibility for products and services)
- Financial details (e.g. salary and details of all other income, expenditure, existing borrowing or loans, credit history, bank details and transactions)
- Unique identifiers and reference numbers that providers have allocated to you (e.g. account numbers and National Insurance numbers)
- Information from credit reference or fraud prevention agencies, electoral roll, court records of debt judgements and bankruptcies and other publicly available sources as well as information on any financial associates you may have
- Family, lifestyle or social circumstances if relevant to the products or services (e.g. the number of dependents you have)
- Education and employment details/employment status for credit and fraud prevention purposes
- Information about other people you are financially linked to (e.g. your spouse) or who have an interest in or association with any of your accounts (e.g. an additional cardholder)
- Information that the law regards as being in a special category because of its sensitivity to you. We can only use this information where you have given us explicit consent or where permitted by law. Information in this category includes:
 - Racial or ethnic origin
 - Political opinions, religious or philosophical beliefs
 - Trade Union membership
 - Genetic or biometric data
 - Health information and data
 - Criminal convictions and offences

How we gather your personal data

We collect information directly from you and others.

You may give us information:

- When completing our 'Personal Financial Planning Questionnaire + Data Capture Form'
- When completing application or proposal forms to apply for products and services
- In emails, letters, phone calls, text messages, face to face meetings in our offices or agreed meeting places, (including information provided on your behalf by someone else, e.g. joint account holders and people you are linked with financially, an employer, financial adviser, accountant, solicitor or other)

We also get information from:

- Companies/people that introduce you to us
- Credit reference agencies (e.g. Experian etc) and fraud prevention agencies
- Product and services providers
- Public records (e.g. the electoral roll, Companies House)
- Other companies/providers (e.g. estate agents, surveyors and lawyers)

We will not be able to provide some products and services without your personal information.

You should tell us without delay if your personal data changes so that we can up-date our records.

Using your personal data: the legal basis and purpose

We'll process your data:

As necessary **to perform our contract with you** for your product or service

- a. To take steps at your request prior to entering into it
- b. To decide whether to enter into it
- c. To manage and perform that contract
- d. To up-date our records
- e. To trace your whereabouts and contact you about your product or service

As necessary **for our own legitimate interests** or those of other persons and organisations, e.g.

- a. For good governance, accounting and managing and auditing our business operations
- b. To search at credit agencies if applying for credit
- c. To monitor emails, calls, other communications and activities on your product or service
- d. For market research, analysis and developing statistics
- e. To send you marketing communications and to contact you in respect of your product or service

As necessary **to comply with a legal obligation** e.g.

- a. When you exercise your rights under data protection law and make requests
- b. For compliance with legal and regulatory requirements and related disclosures
- c. For establishment and defence of legal rights
- d. For activities relating to the prevention, detection and investigation of crime
- e. To verify your identity, make credit, fraud prevention and anti-money laundering checks
- f. To monitor emails, calls, other communications and activity on your product or service

Based on **your consent**, e.g.

- a. When you request us to disclose your personal data to other people or organisations such as lenders or insurers on your behalf, or otherwise agree to disclosures
- b. When we process any special categories of personal data about you at your request (e.g. your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning your health, sex life or sexual orientation, criminal convictions or offences)
- c. To contact you or send you marketing communications where we have asked for your consent to do so

You are free to change your mind and withdraw your consent at any time. The consequence might be that we cannot do certain things for you.

Sharing of your personal data

In order to provide our services, there will be times when we will share your data with other people or organisations.

We will treat the data we hold as confidential and when we share your data with other people or organisations, they are also required to keep the data confidential.

We may share your data with people or organisations:

- The companies, commercial partners, agents, professionals and other persons who provide products, services and administrative support to us
- Our legal and other professional advisers, including our auditors
- The companies, organisations and professionals who provide other services to you
- Credit reference agencies
- Fraud prevention agencies
- UK and overseas regulators, authorities and their service providers (e.g. the Financial Conduct Authority, the Information Commissioner's Office, or the local agents under the Help to Buy scheme)
- UK and overseas tax authorities (e.g. HM Revenue & Customs)
- UK and overseas law enforcement agencies (e.g. the National Crime Agency)
- Courts to comply with legal requirements and for the administration of justice
- To protect the security or integrity of our business operations
- Other persons connected with your product or service (e.g. guarantors or other people named on the application for products or services)
- Anyone who has acted, or will act, as a witness for you
- When we restructure or sell our business or its assets or have a merger or re-organisation
- Anyone else where we have your consent or where it is required by law

Where we share your data with people or organisations who provide a product or service to you, they will process your data as a data controller in their own right and their own privacy policy will apply. You should contact their Data Protection Officer to obtain their privacy policy if you are not provided with this and to exercise your rights under data protection laws.

Where we share your data with people or organisations who provide a product or service to you, they may transfer your data outside the UK and the European Economic Area. Please see their privacy policy accordingly.

How long we keep your personal data for

How long we keep your personal data for depends on the products and services we deliver to you and we will never retain your personal information for any longer than is necessary for the purposes we need to use it for.

- We will retain your personal data for as long as necessary to deal with your queries
- We will retain your personal data for as long as you might legally bring claims against us
- We will retain your personal data based on our legal and regulatory requirements

Keeping your Personal Data Secure

We have security procedures and controls in place to prevent personal data from being lost, used or accessed in an unauthorised way. Any persons processing your data are subject to a duty of confidentiality.

The use of the internet and sending information via e-mail is not completely secure and anything you send is done so at your own risk. Once received, we will secure your information in accordance with our security procedures and controls.

Your rights

You have rights in relation to your personal data. They do not apply in all circumstances.

- The **right to be informed** about our processing of your personal data
- The right to have your personal data **corrected if it is inaccurate** and to have **incomplete personal data completed**
- The right **to object** to processing of your personal data
- The right **to restrict processing** of your personal data
- The right **to have your personal data erased** (the 'right to be forgotten')
- The right **to request access** to your personal data and information about how we process it
- The right **to move, copy or transfer** your personal data ('data portability')

Your personal data may be converted into statistical or aggregated data which cannot be used to identify you, then used to produce statistical research and reports.

Please let us know if you are unhappy with how we have used your personal data. You have the right to complain to the Information Commissioner's Office which regulates the processing of personal data in the UK. Their website for further information is ico.org.uk.