



Newable Business Loans

Privacy Policy

Newable Business Loans Ltd is a subsidiary of Newable Ltd (both “Newable”), and is committed to implementing leading data protection standards and to respecting human rights in data management. This policy sets out how Newable will collect, use and protect an individual’s personal data, including data from Newable’s websites. It will also inform you about your privacy rights and how the law protects you.

Newable is also committed to obtain user data through lawful and transparent means, with your explicit consent, where required and will only collect and process your data, limited to the stated purpose.

If you have any questions about this Privacy Notice or any questions or concerns regarding the manner in which your personal data is being processed, then please send your query to the Data Protection Officer, detailed below.

What personal information do we collect?

Newable (“We”) collect certain personal information from you in order to provide our services. This privacy policy explains how we collect and process your personal information and explains what rights you have in relation to it.

This privacy policy should be read in conjunction with our website privacy policy (available at <https://www.newable.co.uk/privacy-policy/privacy-policy/> which explains various other ways in which we collect and process personal information about you. For example, how we collect personal information about you via our website. Please read both this privacy policy and our website privacy policy carefully. If you have any questions about how we use personal information, please contact us using the contact details set out below.

We collect certain personal information from you when you ask us to provide, or express interest in, our services. This includes:

- Your name; address; contact details; job title; information about your credit history, financial circumstances and family circumstances; and other similar information we

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140 Aldersgate Street, London, EC1A 4HY
+44 (0)333 005 0459

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need to process in order to provide our services and assess your suitability for certain products or services you have asked us about.

- Information relating to the types of products or services you are interested in, such as mortgages, loans, or insurance.
- Information we collect to carry out our identification checks or credit checks, and for various other compliance purposes. This includes, for example: passport information; your driver's licence; utility bills; and/or other verification documentation.
- We may collect information about your health or medical conditions if this is relevant to the services you have requested. For example if you are purchasing certain types of insurance where this information is required.
- We may collect information about actual or alleged criminal convictions and sentencing if this information is needed in order to assess your suitability for products or services.

How do we use the personal information we collect?

We use the personal information provided to us for the following purposes:

- To provide the services you have requested, including identifying and assessing your suitability for loans, mortgages, insurance products, and other products and services, provided by certain third party organizations. We will share your personal information with these organizations to enable them to provide their services to you.
- In order to carry out identification, compliance and credit checks, as explained in our Terms of Business.
- We will use your personal information to contact you about other products and services which are similar to ours which we think you may be interested in. You can opt out of receiving these messages at any time by getting in touch with us at financeconfident@newablefinance.co.uk, or by following the instructions we provide to you alongside the relevant message.
- To communicate with you in relation to our services. For example, to tell you about changes to terms and conditions or to our privacy policy.
- To improve our services and the way we do business, and to ask you for feedback. We may also share your personal information with a potential investor in, or buyer of, our business, provided that they are subject to appropriate obligations of confidentiality.
- To comply with any legal or regulatory obligations, requirements or requests.

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- To protect, defend or enforce our legal rights, or those of others.

We may contact you with about products and services you may be interested in

We may contact you by phone, email, direct message, or SMS, with information about other products and services we offer, which are similar to those which we have provided to you, or which you have expressed interest in, such as services relating to investments, loans, business advice, or workspace solutions. You can opt out of receiving these messages at any time by, emailing us at:

financeconfident@newablefinance.co.uk or by following the instructions provided alongside the message we send you. You can also opt out by writing to us using the postal address set out above.

What is our legal basis for using personal information?

We will only use your personal information if we have a lawful basis for doing so. In particular, we will only use your personal information:

- To perform our contractual responsibilities. For example if you have asked us to provide services to you relating to loans, insurance, mortgages, or other services.
- If it is in our legitimate interests to use it. For example, if we need to use it to improve our services or the way we do business including by analysing how you interact with our services online, to carry out regulatory or compliance checks, to provide information about products and services which we think may be of interest, or if we wish to sell the whole or part of our business to a third party.
- In order to process your application we will supply your personal information to credit reference agencies (CRAs) and they will give us information about you, such as about your financial history. We do this to assess creditworthiness and product suitability, check your identity, manage your account, trace and recover debts and prevent criminal activity.
- We will also continue to exchange information about you with CRAs on an ongoing basis, including about your settled accounts and any debts not fully repaid on time. CRAs will share your information with other organisations. Your data will also be linked to the data of your spouse, any joint applicants or other financial associates.
- Personal and business records at Credit Reference Agencies (CRAs). When CRAs receive a search from Newable this will place a search footprint on your business credit file that may be seen by other lenders. CRAs will supply to Newable both public (including the electoral register) and shared credit and fraud prevention information.

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- The identities of the CRAs, and the ways in which they use and share personal information, are explained in more detail at www.equifax.co.uk/crain and www.experian.co.uk/crain
- Newable and its subsidiaries may also undertake periodic searches at CRAs and FPAs in order to manage your account. The personal information we have collected from you will be shared with fraud prevention agencies who will use it to prevent fraud and money laundering and to verify your identity. If fraud is detected, you could be refused certain services, finance, or employment. Further details of how your information will be used by us and these fraud prevention agencies, and your data protection rights, can be found at <https://www.cifas.org.uk/fpn>.
- If we have obtained your consent. If we rely on consent, you may withdraw your consent at any time by getting in touch with us at: dpo@newable.co.uk or by writing to us at the address above.

Consent to process and criminal records information

If you would like to receive certain products and services from us, we may ask you to provide certain types of sensitive personal information about you in order to provide those services. In particular:

- If you are interested in certain types of insurance such as life insurance, we may ask you to provide certain information about your health or medical conditions.
- If you are interested in certain types of products or services, including certain types of loans, we may ask you for information about actual or alleged criminal convictions including sentencing information.

We will only ever use this information with your consent, which we will obtain from you at the time. This information will only ever be used to assess your suitability for products and services which you have asked us about, and to provide those products and services to you.

We will share this information with the third party organizations such as insurance providers or lenders to enable us and them to provide the services you have requested.

If you have provided your consent you may withdraw it at any time by getting in touch with us at: dpo@newable.co.uk, or by writing to us at the address above.

If you do not provide your consent to the use and sharing of the information referred to

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above, or if you withdraw your consent, this will mean that we are unable to provide certain services, where this information is necessary.

We may transfer personal information outside the UK and the EEA

We or third parties with whom we share personal information in accordance with the privacy policy, may need to transfer personal information provided to us outside the UK and the EEA in order to provide our services to you. This may include, for example, transferring personal information to our suppliers, legal advisers, consultants and subcontractors operating outside the UK and the EEA. If we transfer personal information outside the UK and the EEA, we will do so where one of the following applies:

- There is an adequacy decision by the UK Information Commissioner's Office and/or the European Commission which means that the recipient country is deemed to provide adequate protection for such personal information.
- Where the transfer of personal information is to a member of our group, and we have in place binding corporate rules with such member which safeguard the personal information.
- Where we have in place standard model contractual clauses with the recipient which have been approved by the European Commission and/or the UK Information Commissioner's Office. These model contractual clauses include certain safeguards to protect the personal information
- If such transfer is necessary to enable us to perform our contractual obligations to you, or if it is necessary to enable us to carry out steps at your request, with a view to entering into such a contract.

With whom do we share personal information?

We may share personal information with third parties in the following circumstances:

- We share your personal information with third party insurance providers, mortgage companies, lenders, and other service providers (or organizations acting on their behalf) in order to provide services you have requested or

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expressed interest in.

- We share your personal information with third parties which provide technical, administrative or professional services to us, including for example, IT, hosting, logistical, legal, or professional advisory or administrative services.
- We may share your personal information if we think it is necessary in order to comply with the law, regulatory or legal compliance requirements, or if we need to do so to protect, defend or enforce our legal rights, or the legal rights of others.
- We may share your personal information with other members of our group, which are involved in the provision of our services, or which provide services to us.
- We may share your personal information for corporate reasons. For example, we may need to share personal information with third parties if we restructure our business, or if a third party wishes to invest in, or acquire the whole or part of our business. For how long do we keep personal information?

In general, we will only keep your personal information for as long as we need to, in order to provide the services you have requested.

If we have collected personal information about you in order to carry out suitability checks for particular products or services, or to meet our compliance or regulatory requirements, we will delete your personal information once it is no longer needed for these purposes.

If we need to keep certain personal information for legal reasons, or if we are recommended by guidance to keep personal information for a particular period of time, we will retain such information for this period of time.

We will keep personal information about products and services we have previously provided to you, as well as your contact details, in order to send you marketing messages about products and services you may be interested in which are similar to ours, until you tell us that you no longer wish to receive these messages.

For other types of personal information which we collect in connection with the provision

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of services to you, we will retain this information for up to six years after our contract with you comes to an end.

What choices and rights do individuals have regarding your personal information?

Individuals whose personal information we process may contact us to request that we:

- Confirm whether or not personal information about them is being processed.
- Provide them with further details about how we process their personal information.
- Provide them with a copy of any personal information which we hold about them.
- Update/correct their personal information.
- Delete any personal information which we hold about them.
- Restrict the way that we process their personal information. Consider any valid request to transfer their personal information to a third party provider of services (data portability); and/or
- Consider any valid objections which they have to the use of their personal information.

If you wish to make a request to exercise any of the rights listed above, you should contact us using the contact details set out above. We will consider all such requests and provide our response as soon as we can.

Please note, however, that certain personal information may be exempt from such requests in certain circumstances, which may include if we need to keep processing the personal information for a legitimate interest, or to comply with a legal obligation.

Please note that we may request information necessary to confirm your identity if you make such a request.

Risks and how we keep your personal information secure

The main risk of our processing of your personal information is if it is lost, stolen or misused. This could lead to your personal information being in the hands of someone else who may use it fraudulently or make public, information that you would prefer to keep private.

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For this reason, we are committed to protecting your personal information from loss, theft and misuse. We take all reasonable precautions to safeguard the confidentiality of your personal information, including through use of appropriate organizational and technical measures.

How to contact us about your personal information

If you have any queries or complaints about how we use personal information, or if you wish to exercise any rights you have in relation to your personal information (including opting out of receiving marketing messages from us) you may contact us using the following email address: dpo@newable.co.uk. Alternatively, you may write to us using the postal address stated above.

If you wish to, you may make a complaint to the relevant data protection authority. In the UK, the relevant data protection authority is the Information Commissioner's Office. If you would like further information about how to contact the Information Commissioner's Office please get in touch with us using the contact details above.

Changes to the way in which we use personal information

From time to time may change the way in which we collect, use and process personal information, and we may update this privacy policy to reflect such changes. Any significant changes made to this privacy policy in the future, will be notified to you using the contact details you have provided to us.

Data protection officer

We have appointed a data protection officer, who is responsible for matters relating to data protection. The email address of our data protection officer is: dpo@newable.co.uk. Our data protection officer may also be contacted by writing to us the address set out above.

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