

Privacy Policy



Crown
& Bentley
COMMERCIAL FINANCE

Crown & Bentley Commercial Finance Limited

Privacy Policy

Crown & Bentley Commercial Finance Limited is committed to protecting and respecting your privacy.

Crown & Bentley Commercial Finance Limited ('Crown & Bentley') are a short term boutique finance business providing unregulated loans to SME's, property professionals and developers. We also provide regulated loans to sole traders and simple partnerships to micro sized businesses.

Your data and your online financial security is important to us. We take our responsibility of keeping you as safe as possible extremely seriously.

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting our website you are accepting and consenting to the practices described in this policy.

BRITAIN'S EXIT FROM THE EUROPEAN UNION (BREXIT) NOTICE

Please note that as of 31 December 2020, the European General Data Protection Regulation (GDPR) no longer directly applies in the UK. However, the UK has passed its own version into law, known as the UK GDPR (United Kingdom General Data Protection Regulation). All references to GDPR in this Policy are to the UK GDPR. The UK GDPR has equivalent legal provisions to the GDPR and your rights, and the UK Data Protection Act 2018 and other applicable legislation provide supplementary protections. Unless otherwise specified, the details within this policy, will not be impacted by this change. On 28 June 2021, the EU Commission published adequacy decision in respect of the UK for transfers under the EU GDPR, and confirmed that the UK provides adequate protection for personal data transferred from the EU to the UK under the EU GDPR.

We operate under the Data Protection Act 2018 ('DPA') and the UK General Data Protection Regulation ('UK GDPR').

For the purpose of the UK GDPR and DPA, the data controller is Crown & Bentley Commercial Finance Limited, 1 Royal Exchange, London, EC1V 3DG.

This Privacy Policy explains how we process your information and your rights under both the DPA and UK GDPR.

The DPA and UK GDPR apply to 'personal data' we process, and the data protection principles set out the main responsibilities we are responsible for.



We must ensure that personal data shall be:

- a) Processed lawfully, fairly and in a transparent manner
- b) Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes
- c) Adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed
- d) Accurate and where necessary kept up to date
- e) Kept for no longer than is necessary for the purposes for which the personal data are processed. We operate a data retention policy that ensures we meet this obligation. We only retain personal data for the purposes for which it was collected and for a reasonable period thereafter where there is a legitimate business need or legal obligation to do so. For detail of our current retention policy contact our privacy officer at dpo@cribbcs.net.
- f) Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organisational measures

To meet our Data Protection obligations, we have established comprehensive and proportionate governance measures.

We ensure data protection compliance across the organisation through:

- a) Implementing appropriate technical and organisational measures including internal data protection policies, staff training, internal audits of processing activities, and reviews of internal HR policies
- b) Maintaining relevant documentation on processing activities
- c) Implementing measures that meet the principles of data protection by design and data protection by default including data minimisation, pseudonymisation, transparency, deploying the most up-to-date data security protocols and using data protection impact assessments across our organisation and in any third party arrangements

Broker and Other Intermediaries

Our products and services are available through our office and on our website as well as through professional and financial advisors and anyone else who acts as a person sitting in between you and us in relation to what we do for you. We work with brokers and intermediaries for our lending and investment products and services. In this Policy we will call these persons “brokers and other intermediaries”.

When a broker or other intermediary processes your personal data on our behalf, this privacy policy will apply, and you should contact our Data Protection Officer to exercise your rights under data protection laws. When a broker or other intermediary processes your personal data as a Data Controller in its own right, its own privacy policy will apply, and you should ask them for a copy if you do not have one by the time you are introduced to us.

The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).



We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity data** includes first name, maiden name, last name, title, date of birth.
- **Contact data** includes where you live and how to contact you (Tax Residency status is collected for Residential Mortgage products) email address and telephone numbers.
- **Identity Documents** including stored documents in different formats this could include passport, driving licence or birth certificate, if this is necessary for us to comply with our legal and regulatory requirements.
- **Employment status and source of income** including whether you are employed or retired, your financial position, status and history, your salary, other sources of income and any savings.
- **Financial commitments** existing borrowing and loans, household expenditure, person credit history data obtained from Credit Reference Agencies (CRA's), local authority electoral roll, Companies House and other lenders and providers of credit who supply data to the CRA's, court judgements, decrees and administration orders made publicly available through public registers.
- **Personal data which** we obtain from Fraud Prevention Agencies.
- **Technical data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Usage data** includes information about how you use our website and services.
- **Marketing and communications data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, and Contact Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - complete our enquiry form on our website,
 - contact us by telephone or email to seek a quote; and
 - when you instruct us to provide services for you by telephone or email and you become our client.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties including Technical Data from analytics providers such as Google based outside the EU and the UK.
 - Companies that introduce you to us
 - Brokers
 - Credit Reference Agencies (CRA's)
 - Fraud Prevention Agencies (FPA's)
 - Public information sources such as Companies House
 - Agents working on our behalf
 - Government and law enforcement agencies
- **Cookies.** Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them, refer to our Cookie Policy below.



How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract, we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by [contacting us](#).

Purposes for which we will use your personal data

We have set out below a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

- Administering and managing your account and associated services, updating your records, tracing your whereabouts to contact you about your account and doing this for the recovery of debt;
- Sharing your personal data with certain third-party service suppliers such as payment service providers;
- All stages and activities relevant to managing your account including enquiry, application, administration and management of accounts, illustrations, requests for transfers of equity, setting up/changing/ removing guarantors;
- To manage how we work with other companies that provide services to us and our customers
- To manage fees, charges and interest due on customer accounts
- To exercise our rights set out in agreements and contracts
- When we do what we will call throughout this policy “profiling and other automated decision making”; by “automated decision making” we mean making decisions about you, such as your suitability for a product, using a computer based and automated system without a person being involved in making that decision (at least first time around) and by “profiling” we mean doing some automated processing of your personal data to evaluate personal aspects about you, such as analysing or predicting your economic situation, health, personal preferences, interests, reliability, behaviour, location or movements. For more information, see the sections: “Automated Processing and Automated Decision Making” and “Profiling” below
- Preventing fraud and money laundering, and to verify identity, in order to protect our business and to comply with laws that apply to us.



Processing necessary to comply with our legal obligations:

- To carry out identity checks, anti-money laundering checks and checks with Fraud Prevention Agencies pre-application, at the application stage and periodically after Where you have been introduced to us by a broker or other intermediary they may do these searches on our behalf
- For compliance with laws that apply to us
- For establishment, defence and enforcement of our legal rights
- For activities relating to the prevention, detection and investigation of crime
- To carry out monitoring and to keep records (see below)
- To deal with requests from you to exercise your rights under data protection laws
- To process information about a crime or offence and proceedings related to that (in practice this will be relevant if we know or suspect fraud)

When we share your personal data with these other people or organisations:

- Your guarantor (if you have one)
- Joint account holders, trustees and beneficiaries, and the person with power of attorney over your affairs
- Beneficial owners, if you are applying for a product through your company
- Other payment services providers such as when you ask us to share information about your account with them
- Other account holders or individuals when we have to provide your information to them because some money paid to you by them should not be in your account
- Fraud Prevention Agencies
- Law enforcement agencies and governmental and regulatory bodies such as HMRC, the Financial Conduct Authority, the Prudential Regulation Authority, the Ombudsman, the Information Commissioner's Office and under the Financial Services Compensation Scheme (depending on the circumstances of the sharing) and
- Courts and to other organisations where that is necessary for the administration of justice, to protect vital interests and to protect the security or integrity of our business operations
- Where we consider that, on balance, it is appropriate for us to do so, processing necessary for the following legitimate interests which apply to us and in some cases other organisations (who we list below) are:
 - Administering and managing your account and services relating to that, updating your records, tracing your whereabouts to contact you about your account, and doing this for recovering debt
 - To test the performance of our products, services and internal processes
 - To adhere to guidance and best practice under the regimes of governmental and regulatory bodies such as HMRC, the Financial Conduct Authority, the Prudential Regulation Authority, the Ombudsman, the Information Commissioner's Office and under the Financial Services Compensation Scheme
 - For management and audit of our business operations including accounting
 - To carry out searches at Credit Reference Agencies pre-application, at the application stage, and periodically after Where you have been introduced to us by broker or other intermediary they may do these searches on our behalf



- To carry out monitoring and to keep records (see below)
- To administer our good governance requirements and those of other members of our Group
- For market research and analysis and developing statistics
- For some of our profiling and other automated decision making, in particular where this does not have a legal effect or otherwise significantly affect you
- We process your personal data on the basis that we have a legitimate interest in preventing fraud and money laundering, and to verify identity, in order to protect our business and to comply with laws that apply to us.

Processing with your consent

- We may also from time to time ask you for your consent for other purposes, which we will explain to you at the time. For example, when you request that we share your personal data with someone else and consent to that.
- For some of our processing of special categories of personal data such as about your health (and it will be explained to you when we ask for that explicit consent what purposes, sharing and use it is for).

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [contact us](#) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below. We do not process your data for automated decision-making or profiling purposes.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To respond to your enquiry raised using our enquiry form on our website	(a) Identity (b) Contact	(a) Necessary for our legitimate interests (for running a business)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)



		(b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

Disclosure of your information

We may share your personal information with:

- Mortgage and finance providers
- Legal advisors
- Credit search companies
- RICS property valuers/surveyors
- Our lenders
- Our investors

All of the above is for the purpose of fore filling our obligations to you and determining your suitability for the loan you have applied for. We will share personal information with law enforcement or other authorities if required by applicable law.

We may share your information with selected third parties including:

- Business partners, suppliers, and sub-contractors for the performance of any contract we enter into with [them or] you, including without limitation any data processor we engage.
- Analytics and search engine providers that assist us in the improvement and optimisation of our site.

We may disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Terms of Use or terms and conditions



of supply and other agreements; or to protect the rights, property, or safety of Crown & Bentley Commercial Finance Limited, our customers, or others. This includes exchanging information with other Crown & Bentley organisations for the purposes of fraud protection and credit risk reduction.

Where we store your personal data

The data that we collect from you may be transferred to, and stored at, a destination outside the UK or the European Economic Area ("EEA"). It may also be processed by staff operating outside the UK or the EEA who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy. We will only transfer personal data to countries outside of EEA subject to the us obtaining adequate safeguards in line with the Information Commissioner Office guidelines.

All information you provide to us is stored on our secure servers. Any payment transfers will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site: any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try and prevent unauthorised access.

Retention of your data

We will only keep your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. When you leave us as a client, we shall agree a data retention period with you and after expiry of this period, your personal data shall be deleted.

Your rights

You have the right to ask us not to process your personal data for marketing purposes. We will inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at compliance@crowbandbentley.com.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers, and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.



Under the UK GDPR You have the following specific rights in respect of the personal data we process:

1. The right to be informed about how we use personal data - This Privacy Statement explains who we are; the purposes for which we process personal data and our legitimate interests in so doing; the categories of data we process; third party disclosures; and details of any transfers of personal data outside the UK
2. The right of access to the personal data we hold. In most cases this will be free of charge and must be provided within one month of receipt
3. The right to rectification where data are inaccurate or incomplete. In such cases we shall make any amendments or additions within one month of your request
4. The right to erasure of personal data, but only in very specific circumstances, typically where the personal data are no longer necessary in relation to the purpose for which it was originally collected or processed; or, in certain cases where we have relied on consent to process the data, when that consent is withdrawn and there is no other legitimate reason for continuing to process that data; or when the individual objects to the processing and there is no overriding legitimate interest for continuing the processing.
5. The right to restrict processing, for example while we are reviewing the accuracy or completeness of data or deciding on whether any request for erasure is valid. In such cases we shall continue to store the data, but not further process it until such time as we have resolved the issue
6. The right to data portability which, subject to a number of qualifying conditions, allows individuals to obtain and reuse their personal data for their own purposes across different services
7. The right to object in cases where processing is based on legitimate interests, where our requirement to process the data is overridden by the rights of the individual concerned; or for the purposes of direct marketing (including profiling); or for processing for purposes of scientific / historical research and statistics, unless this is for necessary for the performance of a public interest task
8. Rights in relation to automated decision making and profiling

Please contact our data protection officer at dpo@cribbcs.net for more information about the UK GDPR and your rights under Data Protection law.

If you have a complaint about data protection at Crown & Bentley Commercial Finance Limited, please contact our data protection officer at dpo@cribbcs.net or telephone **0800 910 1101**. Alternatively you may get in touch with our supervisory authority for data protection compliance at: www.ico.org.uk:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate)



About cookies

Cookies are pieces of information that a website transfers to your computer's hard disk for record-keeping purposes. Cookies can make the internet more useful by storing information about your preferences on a particular site, such as your personal preference pages.

The use of cookies is an industry standard, and most websites use them to provide useful features for their customers. Cookies in and of themselves do not personally identify users, although they do identify a user's computer. A Cookie in no way gives us access to your computer or any information about you, other than the data you choose to share. Most browsers are initially set to accept cookies.

If you would prefer, you can set yours to refuse cookies. However, you may not be able to take full advantage of a website if you do so.

We use the following cookies:

Cookie Description		Purpose
_utma Analytics	Google Universal	This cookie is used for website usage analysis.
_utmb Analytics	Google Universal	This cookie is used for website usage analysis.
_utmc Analytics	Google Universal	This cookie is used for website usage analysis.
_utmt	Google Universal Analytics	This cookie is used for website usage analysis.
IDE	Google Ads.	Using for delivering personalised advertising.
Express:sess		This cookie improves page load.
Express:sess.sig		This cookie improves page load.

Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

Contact

Questions, comments, and requests regarding this privacy policy are welcomed and should be addressed to compliance@crownandbentley.com.

Policy Last updated: 09/08/2022.