



GOLDENTREE
FINANCIAL SERVICES PLC

Privacy policy – Goldentree Financial Services Plc

Introduction

At Goldentree Financial Services PLC we take your privacy seriously and this policy outlines how we may collect, hold, and process your personal information. It further explains the specific ways in which we use and disclose that information. In this notice references to Goldentree, we, us and our, are references to Goldentree Financial Services PLC.

For the purposes of the applicable Data Protection Legislation the data controller is Goldentree who in relation to any personal data held will observe all obligations under the Data Protection Legislation and the Data Protection Principles. These obligations will be continuously reviewed in line with the ongoing development of these areas of regulation to ensure compliance and we reserve the right to change the policy at any time.

The information we collect about you

The information we collect will depend on the products and services you apply for and we are able to provide you. Your personal information will be collected or obtained by us whether we deal with you as an individual or on behalf of an individual, business, charity, trust or other organisation that you represent. Broadly, personal information (or 'personal data') is any information that can identify you as an individual. We process many different types of personal information, this may include:

- Basic personal information (e.g. name and address, date of birth and contact details)
- Financial information (including account and transactional information and history)
- Information about your family, lifestyle and social circumstances (such as dependents, marital status, next of kin and contact details)
- Your financial circumstances (e.g personal wealth, assets and liabilities, proof of income and expenditure, credit and borrowing history)
- Education and employment information
- Visual images (such as a copy of your passport or driving license)
- Personal data about your credit history which we will obtain from Credit Reference Agencies (CRAs), local authorities (electoral roll), the insolvency service, Companies House, other lenders and providers of credit who supply data to the CRAs (see information on CRAs below)
- Personal data which we obtain from Fraud Prevention Agencies (see the section on 'Fraud Prevention Agencies' below)
- Special categories of personal information (this may include information you have provided to us such as information about your health). Any personal information about you which relates to criminal convictions or offences will only be used by us when authorised by law.

How we collect and obtain information

We may collect information about you/your business and proprietors, directors and beneficial owners of that business and your transactions. We may collect your information directly from you or indirectly from third parties in a number of ways that may include:

- Information you give to us
- Information that we receive from third parties (e.g. third parties who provide services to you or us including brokers / intermediaries, agents working on our behalf and credit reference, fraud prevention or government agencies)
- Information another person provides us with such as a joint borrower or if you have been nominated as a guarantor
- Information that we learn about you through our relationship with you
- Information that we gather from publicly available sources (such as the electoral register, company registers and online search engines)

How we use and share information collected about you

We collect and process your personal information for a number of lawful bases depending on the reason we have collected it. This may be for a **contractual necessity** (where you have entered into a contract with us and have provided us with your consent), where we need to comply with a **legal obligation**, or where it is necessary for us to use personal information to pursue our **legitimate interests**.

This may include processing to:

- your personal information to administer your account. This will include, for example, issuing all necessary documentation, processing transactions; providing you with account statements, notices, and other information; enforcing any security that we have in place; and dealing with any queries or complaints that you may have. This type of processing is necessary for the performance of our contract with you and to fulfil our legal obligations.
- We have a legal obligation to carry out identity checks, anti-money laundering checks and checks with Fraud Prevention Agencies at the application stage and periodically after that.
- 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)
- We process your personal information for marketing purposes. This is necessary to fulfil our legitimate interests of providing you with information about products and services that you may be interested in.
- If your application is declined, we will store your personal information in accordance with our record retention procedures and to comply with our legal obligations.
- For compliance with laws that apply to us and to protect our legal rights and interests

We may share your personal information with the following third parties:

- Anyone acting on your behalf with your authority to do so
- Joint account holders, guarantors, beneficial owners, and their professional advisors
- The broker if you have been introduced to us
- Credit reference agencies (see below for further information).
- Law enforcement agencies and regulatory bodies, such as the Financial Conduct Authority, the Prudential Regulation Authority, HMRC, the Information Commissioner's Office (ICO), the Financial Ombudsman Service (FOS),
- Fraud prevention agencies
- Our professional advisors
- Organisations that provide us with business support services. For example, back-up and server hosting, document storage, receivers, repossession agents, recoveries agents and property surveyors. This processing is undertaken as it may be necessary for the performance of our contract with you.
- Online marketing platform MailChimp. MailChimp participates in and has certified its compliance with the EU-U.S Privacy Shield Framework. To learn more about how your data will be stored through MailChimp, you can view their privacy policy online <https://mailchimp.com/legal/privacy/>

We may process your information in the running of our business and to protect our customers and employees, where it is necessary to enter into a contract with you for the provision of our products or services or to perform our obligations under that contract. Please note that if you do not agree to provide us with the requested information, it may not be possible for us to provide our services to you.

Sharing your information with Credit Reference Agencies (CRAs) and Fraud Prevention Agencies

If you apply for a loan with us we will perform credit and identity checks on you with one or more Credit Reference Agencies (CRAs). Where you take a loan from us we may also make periodic searches at CRAs to manage your account with us.

To do this, we will supply your personal data to CRAs and they will give us information about you. This will include information from your credit application and about your financial situation and financial history. CRAs will supply to us with both public (including the electoral register) and shared credit information, financial situation, history and fraud prevention information.

We will use this information to:

- Assess your creditworthiness and whether you can afford to take the loan you have applied for;
- Verify the accuracy of the data you have provided to us;
- Prevent criminal activity, fraud and money laundering;
- Manage your account(s);
- Trace and recover debts; and
- Ensure any offers provided to you are appropriate to your circumstances.

When CRAs receive a search from us they will place a search footprint on your credit file that may be seen by other lenders.

If you are making a joint application with a spouse or financial associate, we will link your records together, so you should make sure you discuss this with them, and share with them this information, before submitting the application. CRAs will also link your records together and these links will remain on your and their files until such time as you or your partner successfully files for a disassociation with the CRAs to break that link.

The identities of the CRAs, their role also as fraud prevention agencies, the data they hold, the ways in which they use and share personal data, data retention periods and your data protection rights with the CRAs are explained in more detail on their websites. The CRAs have created a document called the Credit Reference Agency Information Notice (CRAIN). You can access the further information here:

<https://www.equifax.co.uk/crain.html>

<http://www.experian.co.uk/crain/index.html>

<https://www.callcredit.co.uk/crain>

Keeping your information accurate

We want to ensure that your personal information is accurate and up to date. If you wish to notify us that any of the information we hold about you is incorrect or misleading or if the information you have provided to us changes, for example your contact details, please tell us without delay so we can update our records. You can contact us by sending an e-mail to data@goldentreefs.co.uk or writing to us at Goldentree Financial Services Plc, Unit 4a, Birchwood One Business Park, Dewhurst Road, Birchwood, Warrington, WA3 7GB however we may ask you to provide additional evidence for the change such as a marriage certificate or utility bill.

If you wish to notify us that any of the information which we hold about you is incorrect or misleading, we will have the information corrected or amended in a timely manner.

How long we keep your information

We do not keep your information for longer than we need to, which is usually up to seven years after your loan and relationship with us ends to meet any legal obligations, unless we are required to keep it longer (for example due to a court order or investigation by law enforcement agencies or regulators). After seven years any electronic data not needed will be deleted from our records and any paper information will be securely shredded.

Marketing

Goldentree will keep you informed about our products by email unless you tell us you no longer want to receive our emails. You can do this at any time by clicking the unsubscribe link in the marketing email or please send an email to data@goldentreefs.co.uk

Your rights

Right of access – you have the right to request a copy of the information that we hold about you. If you would like a copy of some or all your personal information, please send an email to data@goldentreefs.co.uk your right of access can be exercised in accordance with the Data Protection legislation.

Right of rectification – you have the right to correct data that we hold about you that is inaccurate or incomplete.

The right to be forgotten – you may request that we delete the personal information we hold for you. This will only apply if we no longer need to use the personal information for the purpose it was provided, you withdraw your consent or if we are not using your information in a lawful manner.

Right to restriction of processing – you have the right to restrict our processing of personal data. This will only apply if any of the information we hold about you is inaccurate, we no longer need to process the personal information for the purpose it was provided or if we are not using the information in a lawful manner.

Right of portability – you have the right to receive the personal information you have provided to us in a portable format. You also have the right to request we send the information to a third party.

Right to object – you may object to us processing your personal information for example where it is processed for marketing or where it is processed for statistics

Changes to Privacy policy

Updating our privacy policy helps to improve your experience with us and helps to protect both you and ourselves. We therefore reserve the right to alter this privacy policy without notifying users of the changes made. Any updates to the Privacy Policy will be done so on our website and will be in effect immediately. The most recent version of the Privacy Policy is reflected by the version date located at the bottom of this Privacy Policy.

Complaints and how to contact us

If you have a complaint about how your personal data is being processed by Goldentree, would like to contact us about this privacy notice or if you wish to exercise any of your rights please contact Goldentree Financial Services Plc, Unit 4a, Birchwood One Business Park, Dewhurst Road, Birchwood, Warrington, WA3 7GB or email data@goldentreefs.co.uk

If we cannot resolve your complaint you can contact the Data Protection Regulator - Information Commissioners Office (ICO) by telephone 0303 123 113 or via the website www.ico.org.uk