

PRIVACY POLICY

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your Personal Information. It also explains your rights in relation to your Personal Information and how to contact us or supervisory authorities in the event you have a complaint.

We collect, use and are responsible for certain Personal Information about you. When we do so we are subject to data protection laws applicable in the United Kingdom and we are responsible as 'controller' of that Personal Information for the purposes of those laws.

1. KEY TERMS

It would be helpful to start by explaining some key terms used in this policy:

We, us, our	Raylo Group Limited, a company registered in England and Wales with registered address 5 New Street Square, London, EC4A 3TW (registered company number 11554120) and our group of companies
Personal Information	Any information relating to an identified or identifiable individual

2. PERSONAL INFORMATION WE COLLECT ABOUT YOU

We may collect and use the following Personal Information about you:

- your name, address, date of birth, and contact information, including email address and telephone number;
- your credit or debit card information, information about your bank account and other banking information;
- your contact with us, such as a note or recording of a call you make to one of our contact centres, an email or letter sent, or other records of any contact with us;
- your account information, such as dates of payment owed or received, account numbers or other information related to your account;
- your employment details; and
- information about how you use our website.

This Personal Information is required to inform you about the products and/or services we can or currently provide to you. Where you fail to provide that Personal Information when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with products and/or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. HOW YOUR PERSONAL INFORMATION IS COLLECTED

We collect most of this Personal Information directly from you, by telephone, text or email and/or via our website and apps. However, we may also collect information:

- from publicly accessible sources, eg social media websites;
- directly from a third party, eg:
 - sanctions screening providers;
 - credit reference agencies;
 - customer due diligence providers;
- from a third party with your consent, eg your bank or building society; and
- from cookies on our website – for more information on our use of cookies, please see our cookies policy.

4. HOW AND WHY WE USE YOUR PERSONAL INFORMATION

Under data protection law, we can only use your Personal Information if we have a proper reason for doing so. In order to use your personal information, we rely on the following legal bases:

- (i) processing is necessary for the performance of the products and/or services we provide to you;
- (ii) processing is necessary for the purposes of the legitimate business interests pursued by us (including, for example, improving products and/or services that we offer); and
- (iii) processing is necessary for compliance with a legal obligation to which we are subject (including undertaking screening for financial and other sanctions and conduct checks to identify you and verify your identity).

Generally we do not rely on consent as a legal basis for processing your Personal Information 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 (see 'How to contact us' below).

We collect and process your personal information in order to:

- provide products and/or services to you;
- update customer records;
- prevent unauthorised access and modification to our systems; and
- undertake statistical analysis to help us manage our business e.g. in relation to financial performance, client base and work type.

5. WHO WE SHARE YOUR PERSONAL INFORMATION WITH

We routinely share Personal Information with:

- companies within the Raylo Group Limited group;
- third parties we use to help deliver our products and/or services to you;
- other third parties we use to help us run our business, eg marketing agencies or website hosts;
- third parties approved by you;
- credit reference agencies; and
- our insurers, brokers and other professional advisers.

We only allow our service providers to handle your Personal Information if we are satisfied they take appropriate measures to protect your Personal Information.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share some Personal Information with other parties, such as potential buyers of some or all of our business or during a re-structuring. Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

6. CREDIT REFERENCE AGENCIES

In order to process your application, we will perform credit and identity checks on you with one or more credit reference agencies (“CRAs”).

To do this, we will supply your Personal Information 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 both public (including the electoral register) and shared credit, financial situation and financial history information and fraud prevention information.

We will use this information to:

- assess your creditworthiness and whether you can afford to take the product;
- 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.

We will continue to exchange information about you with CRAs while you have a relationship with us. We will also inform the CRAs about your account and share appropriate information with them. If you do not pay in full and on time or

if you otherwise breach the agreement that we have with you, CRAs will record this information. This information may be supplied to other organisations by CRAs.

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

If you have 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 lodging 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 information, data retention periods and your data protection rights with the CRAs are explained in more detail at:

Equifax

www.equifax.co.uk/crain

https://www.equifax.co.uk/About-us/Privacy_policy.html

TransUnion

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

<http://www.TransUnion.co.uk/legal-information/bureau-privacy-notice>

Experian

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

<https://experian.co.uk/consumer/privacy.html>

7. HOW LONG YOUR PERSONAL INFORMATION WILL BE KEPT

We will only retain your Personal Information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, accounting, or reporting requirements.

To determine the appropriate retention period for your Personal Information, we consider the amount, nature, and sensitivity of the Personal Information, the potential risk of harm from unauthorised use or disclosure of your Personal Information, the purposes for which we process your Personal Information and whether we can achieve those purposes through other means, and the applicable legal and regulatory requirements.

When it is no longer necessary to retain your Personal Information, we will anonymise it.

8. TRANSFERRING YOUR PERSONAL INFORMATION OUT OF THE EEA

We may transfer Personal Information that we collect from you to third party data processors, vendors or hosting partners acting on our behalf located in countries outside of the European Economic Area (“EEA”) or to other entities in our group of companies in connection with the purposes set out above. We will only transfer your personal information outside the EEA where either the transfer is to a country which the EU Commission has decided ensures an adequate level of protection for your personal information, or we have put in place adequate safeguards as required by applicable data protection law.

If you would like further information please contact us (see ‘How to contact us’ below).

9. YOUR RIGHTS

You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your Personal Information (the right of access).
Rectification	The right to require us to correct any mistakes in your Personal Information.
Erasure	The right to require us to delete your Personal Information – in certain situations.
Restriction of processing	The right to require us to restrict processing of your Personal Information – in certain circumstances, e.g. if you contest the accuracy of the data.
Data portability	The right to receive the Personal Information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party – in certain situations.
To object	The right to object: – at any time to your Personal Information being processed for direct marketing (including profiling); or – in certain other situations to our continued processing of your Personal Information, e.g. processing carried out for the purpose of our legitimate interests.

Not to be subject to automated individual decision-making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you.
Withdraw consent	The right to withdraw your consent to us processing your Personal Information at any time if our processing is based on your consent.

For further information on each of those rights, including the circumstances in which they apply, please contact us or see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals' rights under the General Data Protection Regulation](#).

If you would like to exercise any of those rights, please:

- email, call or write to us – see below: 'How to contact us'; and
- let us have enough information to identify you (eg your full name, address and customer or matter reference number);
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- let us know what right you want to exercise and the information to which your request relates.

10. KEEPING YOUR PERSONAL INFORMATION SECURE

We have appropriate security measures to prevent Personal Information from being accidentally lost, or used or accessed unlawfully. We also have procedures in place to deal with any data breach.

11. HOW TO COMPLAIN

We hope that we can resolve any query or concern you may raise about our use of your information.

The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns> or telephone: 0303 123 1113.

12. CHANGES TO THIS PRIVACY POLICY

This privacy notice was published on 22/05/2019 and last updated on 11/09/2019.

We may change this privacy notice from time to time – when we do we will inform you via a notice on our website or via other means of contact such as email.

13. HOW TO CONTACT US

Please contact us by post, email or telephone if you have any questions about this privacy policy or the information we hold about you.

Our contact details are shown below:

Our contact details
Raylo Group Limited 5 New Street Square London EC4A 3TW help@raylo.com 0333 050 9880