



Privacy Policy

Create Commercial Finance LTD is committed to protecting your privacy. This Privacy Policy sets out how Create Commercial Finance LTD handle data which identifies you.

Company Information

Create Commercial Finance's company registration number is 15588413 and our registered office is Office 20, Sadler Bridge, Bold Lane, Derby, DE1 3NT. Optimum Commercial Solutions is authorised and regulated by the Financial Conduct Authority.

This Privacy Policy forms part of our legal information and sets out how we handle data which identifies you. If you have any queries concerning your personal information, please contact our email address: gindy@createcommercialfinance.com

During the course of dealing with us we will ask you to provide us with detailed personal information relating to your existing circumstances, your financial situation and, in some cases, your health and family health history (Your Information). We would like to explain to you what we will need to do with Your Information, and the various rights you have in relation to Your Information.

What do we mean by "Your Information"?

Your Information means any information describing or relating to you. Your Information may identify you directly, for example your name, address, date or birth, National Insurance number and the like. Your Information may also identify you indirectly, for example, your employment situation, your physical and mental health history, or any other information that could be associated with your cultural or social identity.

In the context of providing you with assistance in relation to your financial requirements Your Information may include:



- Title, names, date of birth, gender, nationality, civil/marital status, contact details, addresses and documents that are necessary to verify your identity
- Employment and remuneration information, (including salary/bonus schemes/overtime/sick pay/other benefits), employment history
 - Bank account details, tax information, loans and credit commitments, personal credit history, sources of income and expenditure, family circumstances and details of dependents
- Health status and history, details of treatment and prognosis, medical reports (further details are provided below specifically with regard to the processing we may undertake in relation to this type of information)
- Any pre-existing financial products and the terms and conditions relating to these

The basis upon which our Company will deal with Your Information

When we speak with you about your financial requirements we do so on the basis that a contract for the supply of services is in place between us. In order to perform that contract, and to arrange the products you require, we have the right to use Your Information for the purposes we set out below.

Alternatively, either during initial discussions with you or when the contract between us has come to an end for whatever reason, we have the right to use Your Information provided it is in our legitimate business interest to do so and your rights are not affected. For example, we may need to respond to requests from lenders, insurance providers and the Financial Conduct Authority relating to the advice we have given to you, or to contact you to seek feedback on



the service you received.

On occasion, we will use Your Information to enable us to meet any contractual responsibilities we may have with the Financial Conduct Authority, or for wider compliance with any legal or regulatory obligation to which we might be subject. If this were to arise, we would be processing Your Information in order to meet a legal, compliance or other regulatory obligation to which we are subject.

How do we collect Your Information?

We will collect and record Your Information from a variety of sources, but mainly directly from you. You will usually provide information during the course of our initial meetings or conversations with you to establish your circumstances and needs and preferences in relation to financial products. You will provide information to us verbally and in writing, including email.

We may also obtain some information from third parties, for example, credit checks, information from your employer, and searches of information in the public domain such as the voters roll. If we use technology solutions to assist in the collection of Your Information, such as software that is able to verify your identity on-line or to access your credit status and/or bank account entries, then you will be required to provide your consent for us or our nominated processor to access your information in this manner, and details of how such software operates will be provided to you prior to the activation of the service.

What happens to Your Information when it is disclosed to us?

In the course of handling Your Information we will

- record and store Your Information in our paper files and on our computer systems (email, hard drives, cloud facilities) and it will be accessed by employees and consultants within, or contractors engaged, by our Company as



necessary to provide our service to you and to perform any administration tasks associated with or incidental to that service

- submit Your Information to lenders and/or insurance product providers, both in paper form and on-line via lender/insurance provider systems, in order to progress any enquiry or application made on your behalf and to deal with any additional questions or administrative issues that lenders and insurance providers may raise
- use Your Information for the purposes of responding to any queries you may have in relation to any financial product or insurance policy you may take out, or to inform you of any developments in relation to those products and/or policies of which we might become aware

Sharing and Transferring Your Information

From time to time Your Information will be shared with or transferred to:

- to lenders and insurance providers
- third parties who we believe will be able to assist us with your enquiry or application, or who are able to support your needs as identified, such third parties will include but may not be limited to, product specialists, estate agents, providers of legal services such as conveyancing, surveyors and valuers (in each case where we believe this to be required due to your particular circumstances).

In each case for the purposes set out in this customer privacy notice, i.e. to progress your borrowing and/or insurance enquiry and to provide you with our professional services.

Please note that this sharing of Your Information does not entitle such third parties to send you marketing or promotional messages: it is shared for the purpose of ensuring we can adequately fulfil our responsibilities to you, and as otherwise set out in this Customer Privacy Notice.

We do not envisage that the performance by us of our service will involve Your Information being transferred outside of the European



Economic Area.

Security and retention of Your Information

Your privacy is important to us and we will keep Your Information secure in accordance with our legal responsibilities. We will take reasonable steps to safeguard against Your Information being accessed unlawfully or maliciously by a third party, accidentally lost, destroyed or damaged.

We also expect you to take reasonable steps to safeguard your own privacy when transferring information to us, such as not sending confidential information over unprotected email, ensuring email attachments are password protected or encrypted and only using secure methods of postage when original documentation is sent to us. Your Information will be retained

5. by us either electronically or in paper format for a minimum of six years, or if longer than six years, the duration of this Companies relationship with you.

Your rights in relation to Your Information

You can:

- request copies of Your Information that is under our control
- ask us to further explain how we use Your Information
- ask us to correct, delete* or require us to restrict or stop using Your Information (details as to the extent to which we can do this will be provided at the time of any such request)
- ask us to send an electronic copy of Your Information to another organisation should you wish
- change the basis of any consent you may have provided to enable us to market to you in the future (including withdrawing any consent in its entirety)



- make contact with our Company in relation to the use of Your Information

If you have any questions or comments about this document, or wish to make contact in order to exercise any of your rights set out within it please contact:

[Your registered company address] or email: [Your Data Protection Officer's email address]

If we feel we have a legal right not to deal with your request, or to action it in different way to how you have requested, we will inform you of this at the time. You should also make contact with us as soon as possible on you becoming aware of any unauthorised disclosure of Your Information, so that we may investigate and fulfil our own regulatory obligations.

If you have any concerns or complaints as to how we have handled Your Information or Your Special Data/Criminal Disclosures you may lodge a complaint with the UK's data protection regulator, the ICO, who can be contacted through their website at <https://ico.org.uk/global/contact-us/> or by writing to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

Site monitoring

When you use the site we anonymously record the details of the pages you look at but this data is not personally identifiable. We use this data to monitor site traffic and analyse paths customers take through our site which enable us to improve the service we provide. This information is only used by us and is not passed to any other party.

Security

We have security measures in place to protect our customer database and access to this database is restricted internally. However, it remains your responsibility:



- to protect against unauthorised access to your log in details;
- if you open more than one browser of the same type whilst using the website, to remember to close down all browser windows when you finish.
- if you share a computer with someone else or use a public Internet access then we advise you to delete the browsing history and log off the computer. This will help ensure any personal information stored temporarily in the computer's memory is lost.

Disclosure for legal and regulatory reasons

We reserve the right to communicate such personal information as we hold to third parties which seek the disclosure of it, if we are requested to do so by law or by a regulatory authority.

Links to third party sites

Our site may contain links to other sites. We are not responsible for the privacy practices, or the content of those websites. You should read the privacy policies of every website that collects data.

Cookies

A cookie is a small file which is placed on your computer's hard drive. If you agree to have cookies stored on your computer, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. This site uses cookies to analyse traffic, but not for tracking purposes.

Log Files and Statistics

We may use IP addresses, URL's of requested resources, timestamps



and HTTP user agents to analyse trends, administer the system and gather broad demographic information for aggregate use. In addition to this we may use third party services to monitor your use of our website, including Google Analytics, a web analytics service provided by Google, Inc ('Google'). Google Analytics use cookies to help analyse how visitors use our site. The information generated by the cookie about the use of our web-site (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of our web-site, compiling reports on web site activity and providing other services relating to web-site activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your web browser, however, please note that if you do this you may not be able to make full use of our web-site. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

7

Legal Information and Your Agreement

Access by you to our website is confirmation that you have understood and agreed to be bound by all of these terms and conditions. This website is prepared and issued in the United Kingdom and is intended for the information of United Kingdom residents only. This web-site is for information purposes only and its content is subject to change without notice. Nothing on this web-site shall be deemed to constitute financial advice and in the event that you wish to have any such advice, please contact us.

Disclaimer

Whilst we use all reasonable efforts to ensure that the information



published on this website is accurate, current and complete at the date of publication, no representatives or warranties are made (express or implied) as to the accuracy, currency or completeness of such information. We cannot accept responsibility (to the extent permitted by law) for any loss arising directly or indirectly from the use of, or any action taken in reliance on, any information appearing on this web-site or any other website to which it may be linked. We make not warranty that this website is free from errors, defects or viruses. We reserve the right to change, modify, add or remove provisions of this Privacy Policy. Any changes to this Policy will be shown here, and we recommend that you check this Policy again from time to time.

Copyright Notice

The entire contents of this website (except where applicable the crown copyright location maps) is our property and is subject to copy right with all rights reserved. You may download or print individual sections of the web-site for personal use and information only provided that these properly indicate our copyright and other proprietary notices. You may not reproduce (in whole or in part), modify, decompile, disassemble or transmit or use for any commercial purpose whatsoever any information from this website without Our prior written consent.

E-Mail

There is no guarantee that any e-mail you send will be received by us or that the confidentiality of that e-mail will be maintained during internet transmission.

Applicable Law

Any disputes arising from the use of this website shall at all times be governed by the laws of England and Wales and the parties shall submit to the exclusive jurisdiction of the English Courts.



International Transfers of Personal Information

As the internet can be accessed world wide, if you are visiting the site from outside the UK, your visit will necessarily result in the transfer of information across international borders. By visiting this site and communicating electronically with us you are consenting to these transfers.