



Personal Data Privacy Notice

This document (our '**Privacy Notice**') sets out how we, Oakbridge Financial Services Ltd, use your personal information.

April 2019

1. INTRODUCTION

We are Oakbridge Financial Services Limited and we can be contacted in writing at 10 Riverview, The Embankment, Vale Road, Stockport SK4 3GN or by telephone on 0161 438 1111.

2. WHAT PERSONAL INFORMATION DO WE COLLECT?

We may hold and use the following personal information about you:

- your name, address, telephone numbers, email address(s), date of birth, place of birth, nationality, tax/residency status, passport, employment, banking and financial details;
- demographic and lifestyle information;
- information we receive when making a decision about you, your loan or your application for such a loan;
- information that you provide by completing forms that we provide to you;
- details of the loan(s) you have and have had with us and all transactions;
- details of when you contact us and when we contact you (e.g. copies of any correspondence and recordings of telephone calls); and/or
- details of how you applied for your loan, together with any other information (including where obtained from third parties) which we reasonably need to operate your loan, make decisions about you or fulfil our regulatory obligations.

We may also collect information about other people connected to you (such as your dependents, joint account holder(s), Powers of Attorney, guarantor(s) or third party security provider(s)).

In the course of providing our lending services to you, we may obtain personal information about you and your family and/or business associates which is sensitive or intrinsically private. We will only ever use such information to provide our lending services to you and in order to comply with our lawful obligations. If you wish us not to use this sensitive or intrinsically private information, please let us know immediately. If you do not provide the personal information we request we may be unable to progress your lending application. By signing and submitting our Authority & Declaration form you are expressly consenting to our use of this sensitive or intrinsically private information in the ways set out in this Privacy Notice.

Within this Privacy Notice any reference to Data Protection Laws means the Data Protection Act 2018, the EU Data Protection Directive 95/46/EC, the EU Directive on Privacy and Electronic Communications 2002/58/EC, the General Data Protection Regulation ((EU) 2016/679)) and all national legislation relating to data protection and privacy (to the extent applicable and in force from time to time).

3. HOW DO WE USE YOUR PERSONAL INFORMATION?

We may use the information we collect about you:

- to process and complete your requests and/or applications for loans and/or services;
- for security and ID verification;
- to update our records and maintain your loan(s) with us;
- to make decisions about your eligibility for our loans and/or services;
- to develop and improve our products and/or services;
- to protect ourselves against harm to our rights and property interests; and/or
- to provide specific information to our regulators and other government bodies to adhere to our regulatory, legal and compliance obligations.

If you give us information about other people (such as dependents, joint account holder(s), Powers of Attorney, guarantor(s) or third party security provider(s)), which we will use to provide services, then you confirm that you know they agree or that you are otherwise allowed to give us this information. We will send them a copy of this Privacy Notice to ensure they are aware of how their personal information will be processed.

Once your loan account is closed, or if your application for a loan or service is declined or you decide not to go ahead with it, we will keep your information afterwards.

Please note that we may record communications by telephone for the purposes of monitoring our client service standards, training and for regulatory and security purposes.

4. WHAT SOURCES DO WE USE?

We may obtain personal information about you from the following sources:

- you;
- your employer (where appropriate);
- people who have introduced you to Oakbridge;
- identification and verification agencies;
- your professional adviser(s);
- credit reference agencies;
- fraud prevention agencies; and/or
- publicly accessible sources

5. WHEN IS YOUR PERSONAL INFORMATION DISCLOSED AND WHO DO WE DISCLOSE IT TO?

We will disclose your personal information only:

- where you have consented;
- to third parties who are bound to keep such information secure and confidential, such as our suppliers, contractors, agents and business partners (and their sub-contractors) who help us provide our services to you;
- to organisations or agencies who host or maintain data centres, service platforms and other infrastructure and systems on our behalf, where your personal information is processed and/or stored;
- to our professional advisers;
- to your advisers (such as accountants, lawyers, financial or other professional advisers) if you have authorised anyone like this to represent you, or any other person you have told us is authorised to give instructions or to act on your behalf (such as an attorney under a power of attorney);
- to any prior or subsequent mortgagee(s) in respect of any property held as security for your loan account(s);
- to UK and overseas regulators and authorities in connection with their duties (such as tax and crime prevention);
- if we are required to do so as part of our duty to protect your accounts, for example we are required to disclose your information to the UK Financial Services Compensation Scheme (FSCS);
- when we are required to comply with (i) a court order, (ii) a request from a law enforcement agency or (iii) other legal obligations;
- when there is a public duty to disclose information, such as in time of war;
- to comply with anti-money laundering legislation;
- when it is necessary to prevent fraud and money laundering, reduce credit risk or recover any money you owe to us;
- in the event that we sell or buy any of our business or assets, in which case we may disclose your personal information (as a client) to the prospective seller or buyer of such business or assets, or to anyone funding the sale or purchase of such business or assets regardless of whether the sale or purchase is completed;
- to protect our rights, property, or safety of our employees, clients or others including in order to enforce our terms of use and other agreements; and/or
- to a guarantor if necessary and where we have received a request from the guarantor concerning your wish to enter into a guarantee.

If we reasonably think that you are required to report your income or are subject to tax in another country, we may have to share information about your accounts / loan facilities with the UK or relevant tax authorities, either directly or via the local tax authority who may share that information with the appropriate tax authorities abroad. If we need to request extra documents or information from you about this, you must supply these. If you don't, you agree to immediately fully repay your outstanding loan(s).

6. HOW DO WE WORK WITH CREDIT REFERENCE AGENCIES, IDENTITY VERIFICATION AGENCIES AND FRAUD PREVENTION AGENCIES?

We may perform searches about you using Identity Verification Agencies who supply us with identity information, as well as information about you from the Electoral Register, in order to verify your identity. Our search is not seen or used by lenders to assess your ability to obtain credit but a record is retained by the agency whether or not your application to become a client proceeds.

We may perform searches about you using Credit Reference Agencies (CRAs) who supply us with credit information. We may supply CRAs with any information about you that CRAs request in order to carry out their credit reference services (including, without limitation, client performance data, income, account use).

Your personal information may be shared between us, CRAs and fraud prevention agencies (FPAs) (to prevent fraud and money laundering) when:

- making credit assessments;
- checking that the details on applications for credit, borrowing facilities and services are correct;
- understanding your financial position through sharing and receiving information, for example, about any borrowing and how you manage it. This includes the amount you borrow and your payment history, including any payment arrangements;
- recovering debt;
- managing credit facilities;
- checking the details on proposals, applications for and claims on insurance policies; and
- checking details of job applicants and employees.

We will provide your personal information to FPAs where false or inaccurate information is provided and fraud is identified. Law enforcement agencies may be able to access and use the information recorded with FPAs.

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 or tell us that you have a spouse or financial associate, we will link your records together so you must be sure that you have their agreement to disclose information about them. CRAs 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.

Any enquiry we make at a credit reference agency may be answered with reference to any associated person's records.

Another person's record will be associated with yours when:

- you are making a joint application; or
- you tell us about a financial association with another person.

In addition to the information we may supply to CRAs as set out above, we may also supply information to CRAs about the personal debts you owe us ('debt information') if:

- you have fallen behind with payments;
- the amount owed is not in dispute; and
- you have not made proposals we are satisfied with for repaying the debt following our formal demand.

If you borrow and do not repay in full and on time, CRAs will record the outstanding debt. This information may be supplied to other organisations by CRAs and FPAs to perform similar checks and to trace your whereabouts and recover debts that you owe.

You can contact us if you want to receive details of the relevant FPAs we use or to find out which CRAs we have used so that you can get a copy of the personal information that they hold about you.

7. HOW WE KEEP YOUR PERSONAL INFORMATION SECURE

We take the security of your personal information seriously. For instance, when you speak to us on the telephone, we may ask questions in order to verify your identity.

We, our payment agency or third parties acting on our behalf, may transfer your personal information outside the European Economic Area and we will endeavour to protect your personal information in accordance with the standards set out under the Data Protection Laws. Additionally, we and other organisations may access and use from other countries the information recorded by fraud prevention agencies.

We will keep your personal information for as long as is necessary in accordance with legitimate business purposes as well as in order to prevent fraud and other financial crime, or for any other legal or regulatory reason.

8. YOUR RIGHTS

You have the right to ask us about the personal information we hold on you and we will provide you with a copy in accordance with our obligations under the Data Protection Laws.

You should let us know if you think any information we hold about you is inaccurate, so that we can correct it.

You have the right to request erasure of your personal data. However, this could, depending on the circumstances, be overridden by our regulatory and legal based compliance requirements to retain the data.

You may request us to restrict processing of your personal data although we may not be able to agree to your request if it conflicts with our legitimate business interests.

You have the right under certain circumstances to have your personal data ported to another lender.

If you are unhappy about how your personal data has been used please refer to our complaints policy as detailed on our website www.oakbridge.co.uk or contact us on 0161 438 1111 to request a copy. You also have the right to complain to The Information Commissioner's Office www.ico.org.uk which regulates the processing of personal data. The Information Commissioner's Office can be contacted by telephone on 0303 123 1113 or in writing at:

Wycliffe House
Water Lane
Wilmslow
SK9 5AF

9. CONTACTING US

You may contact us at Oakbridge Financial Services Ltd, 10 Riverview, The Embankment, Vale Road, Stockport SK4 3GN or by telephone on 0161 438 1111.

We may amend this Privacy Notice from time to time to reflect changes made to our 'Privacy Policy' or other regulatory requirements. Any changes made to our Privacy Policy will apply directly to this Privacy Notice.