



Sterling Capital Asset Finance Ltd Privacy Policy

Sterling Capital Asset Finance Ltd is committed to protecting and respecting your privacy.

Sterling Capital Asset Finance Ltd, (SCAFL) who we are and what we do

We are an Asset Finance Broker and Lender. This means that we can assist you and/or your business with Hire Purchase, Leasing or Loan facilities when you are purchasing capital assets. Sterling Capital Asset Finance Ltd is Authorised and Regulated by the Financial Conduct Authority, FRN 680837.

We provide these facilities in two ways;

- We have a panel of funders, (external banks and finance houses), who we broke to.
- Own book funding, where we use our own funds to lend to you and/or your business. We use Block Discount Funders to secure funds for our own book lending.

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.

For the purpose of the European Data Protection Regulations ('GDPR') and the Data Protection Act 2018 (the Act) and, the data controller is Wayne Humphreys at Sterling Capital Asset Finance Ltd, Hanover House, The Square, Lower Bristol Rd, Bath, BA2 3BH

This Privacy Statement explains how we process your information and your rights under both DPA and GDPR.

Information we may collect from you

SCAFL will be what is known as the 'controller' and the 'processor' of the personal data you provide to us. We collect personal data about you which may also include any special types of information or location-based information.

We may collect and process the following data about you:

- **Information you give us**
 - Name, address and contact details of you and your business.
 - General description of your business activities and current plans.
 - Accounts, bank statements and other financial information.
 - Directors personal details such as address, date of birth, gender.
 - Bank Account details.
 - When requested, personal financial information such as income and expenditure information, details of Assets and Liabilities and personal bank statements.
 - Copies of Proof of Identification and Proof of Address for Anti Money Laundering purposes.
- **Information we collect about you**
 - Experian business reports showing Limited Company details, (Company Registration No, Registered Office Address, Date of Incorporation, Directors, Shareholders, details of Parent and Subsidiary companies, Accounting Information, Adverse credit information that has been registered to the company such as County Court Judgements and Winding Up Orders).
 - Experian also give a credit score to your business based on the above information and payment performance data that they collate.
 - Information held and available from Government Agencies such as Operating Licenses or Scrap Metal Licenses



- BACS, (Bank Automated Clearing Services), information where we collect repayments by Direct Debit.
- **Information we receive from other sources**
 - Credit Decisions from our Panel of Funders.
 - Information from Suppliers about the goods and costs of what you are purchasing.
 - Settlement figures from our Panel of Funders when they are required.
 - Payment performance from our Panel of Funders and our own Direct Debit systems.

Uses made of the information

We combine and use some or all of this information in the following ways:

- We will share this information with one or more members of our Panel of Funders in order that they can to make credit decisions about you and/or your business. This can be for specific purchases or as a general credit line to assist with your future buying plans.
- To make credit decisions about you and/or your business where we may lend to you and/or your business directly, (i.e. Our Own Book Funding).
- To give Suppliers information so they can raise their invoice correctly.
- To diarise when next to be in touch based on your buying plans.
- To comply with Anti-Money Laundering regulations.
- To monitor payment performance and credit control.
- For the prevention of Fraud.
- To secure own book funding with our Block Discounters.
- For internal statistical analysis.
- To collect repayments on our Own Book agreements.

Automated Decision Making

Automated Decision Making: SCAFL will pass your data to our panel of funders who may use automated decision-making in respect of your application for finance. We will only collect the minimum amount of data needed and have a clear retention policy for the profiles we create

You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or any significant affects. You can request human intervention and challenge a decision made this way by speaking to your Sterling Capital Asset Finance Ltd contact on 01225 444075

Disclosure of your information

We may share your personal information with

- Our Panel of Funders for credit decision making, raising of finance documents and maintaining finance agreements.
- Our internal credit team for internal credit decision making, raising of own book finance documents and maintaining finance agreements.
- Suppliers so that they can correctly raise their invoices.
- Our Block Discounting Funders so that we can secure funding for our own book lending.
- BACS system, so that we can monitor and collect repayments on finance agreements.

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 SCAFL, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

Lawful Processing of your Data under GDPR

For the processing of Data to be lawful under GDPR SCAFL use the following:

- a) Consent: You, the individual has given clear consent for us to process your personal data for a specific purpose.
- b) Contract: the processing is necessary for a contract we have with you, or because we have asked you to take specific steps before entering into a contact.
- c) Legal obligation: the processing is necessary for us to comply with the law (not including contractual obligations).

Where we store your personal data

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside 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.

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 encryption procedures and security features to try and prevent unauthorised access.

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 enquiries@sterling-capital.co.uk.

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.

Your rights under Data Protection Law

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

The DPA and 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 enquiries@sterling-capital.co.uk.
- 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

We ensure lawful processing of personal data by obtaining consent; or where there is a contractual obligation to do so in providing appropriate products and services; or where processing the data is necessary for the purposes of our legitimate interests in providing appropriate products and services.

In the majority of cases we process personal data based on your contract with us. In other cases, we process personal data only where there are legitimate grounds for so doing.

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

Under the 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 privacy officer at enquiries@sterling-capital.co.uk for more information about the GDPR and your rights under Data Protection law.

If you have a complaint about data protection at SCAFL, please contact our privacy officer at enquiries@sterling-capital.co.uk.

Alternatively contact our supervisory authority for data protection compliance: 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. 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.

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 enquiries@sterling-capital.co.uk

Policy Last updated: 21/05/2018