

**IFG UK LTD T/A Infinite Finance Group**

Wises Oast Business Centre, Wises Ln, Sittingbourne, Kent, ME9 8LR.

Registered in England and Wales No. 13837907

**PRIVATE AND CONFIDENTIAL**

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# Privacy Notice

## Why Is This Document Important?

During the course of dealing with IFG UK LTD (Here forth referred to as Infinite), we will ask you to provide detailed personal information and documentation (Your Personal Data). This document allows us to explain to you, why we need your data, what we intend to do with this data and your various rights in relation to your personal data and consents.

For the purpose of the Data Protection Act 1998 (the Act), Regulation (EU) 2016/679 (General Data Protection Regulation) and Privacy and Electronic Communications Regulations (PECR), the data controller is IFG UK LTD T/A Infinite Finance Group of Wises Oast, Wises Ln, Sittingbourne, Kent, ME9 8LR.

## Vulnerable Customers:

*If you feel you have requirements that may fall outside our normal sales process due to a vulnerability, please alert your dedicated point of contact or the director (as above) at the earliest opportunity and we can discuss how to meet your needs adequately.*

## 1 – What Do We Mean By ‘Your Personal Data’?

Your Personal Data means ANY information that describes or relates to your personal circumstances. This can be direct data (name or Date of Birth) or indirect data (General health and wellbeing). In the context of providing you with finance, your personal data may include:

- Title, names, date of birth, personal addresses, nationality, marital status, contact details and any other information or documentation necessary to verify your identity and place of residence.
- Current employment and employment history, along with any remuneration information.
- Bank account details, tax information, loans and credit commitments, personal credit history, details on any adverse financial history, sources of income and expenditure, family circumstances and details of dependents.
- Health status and history, details of treatment and prognosis, medical reports etc... This is needed in certain scenarios where we deem the individual to fall inside our ‘**Vulnerable Customer**’ policy. Further details on this policy and how we will treat this specific data can be gained upon request by emailing [luke@ifg-uk.co.uk](mailto:luke@ifg-uk.co.uk)

- Any other direct or indirect personal information that may arise on a case by case basis, including *Special Data* as outlined at the bottom of this document.

## **2 – How We Use ‘Your Personal Data’?**

At Infinite, we take the privacy of your Personal Data very seriously. When we speak with you about your finance requirements, we do so on the basis that you are looking for the supply of our services. In order to arrange the products/services you require, we have the right to use Your Personal Data for the purposes detailed below:

- Enabling finance providers (Lenders) to make a decision on your application.
- Fraud Prevention measures.
- Auditing and regulatory body purposes
- Credit reference agency checks
- Statistical analysis and internal professional development.

On occasion, we will use Your Personal Data for contractual responsibilities we may owe our regulator, The Financial Conduct Authority (FCA), or for wider compliance with any legal or regulatory obligation to which we might be subject. In such circumstances, we would be processing Your Personal Data to meet a legal, compliance or other regulatory obligation to which we are subject. We may share your information with and obtain information, about you from credit reference agencies or fraud prevention agencies. In certain scenarios, Information you provide may be put onto a register and shared with other lenders to prevent fraudulent claims. You can use this link to find out more at <https://www.experian.co.uk/legal/crain/>

## **3 – How We Collect ‘Your Personal Data’?**

We will collect and record Your Personal Data 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, needs and preferences in relation to finance. Types of information gathering processes we use are:

- Verbal either in person or over the phone
- In any written format including but not limited to SMS, email, and letters.
- Online forms
- Conducting social media / website reviews

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 Personal Data, for example software that can verify your credit status, we will only do so if we have consent from you, for us, or our nominated processor to access your information in this manner. With regards to electronic ID checks, we do not require your consent but will inform you of how such software operates and the purpose for which it is used.

## **4 – What Happens To ‘Your Personal Data’ Once It’s Disclosed To Us?**

Infinite will be what’s known as the “controller” and the “processor” of your personal data you provide to us. We will:

- Record and store Your Personal Data in our, paper files, mobile devices, cloud storage and CRM System. This information can only be accessed by employees and consultants within our firm and only when it is necessary to provide our service to you and to perform any administration tasks associated with or incidental to that service.
- Submit Your Personal Data to Commercial Lenders & Niche Finance Product providers, in paper form, Via email and on-line via a secure portal. The provision of this information to a third party is essential in allowing us to progress any enquiry or application made on your behalf and to deal with any additional questions or administrative issues that lenders and providers may raise.
- Use Your Personal Data for the purposes of responding to any queries you may have in relation to finance product 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. In each case, Your Personal Data will only be shared for the purposes set out in this Customer Privacy Notice, i.e. to progress your finance enquiry and to provide you with our professional services.

\*Please note that this sharing of Your Personal Data does not entitle such third parties to send you marketing or promotional messages, it is shared to ensure we can adequately fulfil our responsibilities to you, and as otherwise set out in this Customer Privacy Notice\*.

Our data is stored and protected on UK and European based servers, however, our client relationship management (CRM) provider and cloud provider hold servers all over the world, so some transfers may be made outside of the EEA in certain scenarios. We have conducted extensive due diligence on these providers to ensure it meets our needs and the requirements under all UK GDPR Regulations. We have also ensured various safeguards over both systems to ensure our customer data is not become accessible from outside the EEA, such as controlling user access and permissions, 2 factor authentication, limiting features that may make customer data accessible outside the EEA, and ensuring the providers have regional hosting policy for UK users and the built-in controls mean customer data does not pass beyond EU data centres.

## **5 – Security and Retention Of ‘Your Personal Data’?**

Your privacy is important to us and we will keep Your Personal Data secure in accordance with our legal responsibilities. We will take reasonable steps to safeguard Your Personal Data against it being accessed unlawfully or maliciously by a third party. 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 being sent to us.

Your Personal Data will be retained by us either electronically or in paper form for a minimum period of 5 years following the advice/service you receive from us, although your data could be held for a longer period where this may be needed to meet the requirements of our regulatory bodies.

We will not sell your personal information to any third party other than as part of any restructuring of the Company or Group or sale of a relevant Group business. We use contact details (mobiles and emails) within our group of companies for marketing purposes only where there is a legitimate interest in doing so. Any engagement with other companies that are part of our group (IFG UK HOLDINGS LTD) which result in the processing of data for a deal, we will verbally ask for your consent for us to pass personal details over to the relevant company for the completion of the task you have requested.

## **6 – Your Right Over ‘Your Personal Data’?**

At any point in time, whether you are currently in a finance agreement we have transacted or not, you can:

- Request a copy of Your Personal Data that is held by us as the 'Controller'.
- Ask us to further explain how we use, store, transact and your rights of Your Personal Data.
- Ask us to correct, delete or restrict the use of your personal data (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 Personal Data to another organisation should you wish. This request must be in written format, either via email, text or post.
- Change the basis or withdraw consent you may have provided to either market you in the future, or provide consent relating to personal searches that are largely required by our panel of lenders for an financial application.

If you have any questions, comments or concerns about this document or wish to make contact in order to exercise any of your rights set out within it, please contact Luke Haffenden (Managing Director) on 07496 419781 or email [luke@ifg-uk.co.uk](mailto:luke@ifg-uk.co.uk) where he will endeavour to reply within 2-3 working days on any related requests.

If we feel we have a legal right not to deal with your request, or to action it in a 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 Personal Data, 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 Personal Data 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 and issuing them with our ICO reference number (ZB304077)

### **Special Data**

We use this term to refer to data that may be more sensitive, such as criminal offences or your personal health and wellbeing. Where you ask us to assist you with finance and it becomes apparent there is Special Data relating to you, we will ask you information about your ethnic origin, your health and medical history, criminal offences etc... (Your Special Data). We will record and use Your Special Data in order to make enquiries of finance in relation to products that may meet your needs and to provide you with advice/guidance regarding the suitability of any product that may be available to you. We will use Special Data and any Criminal Disclosures in the same way as Your Personal Data generally, as set out in this Privacy Notice.

### **Important Note**

*Your consent for us to process Your Personal Data is not a requirement*, however, it may impair our ability to conduct our services as broadly, lenders require clear personal searches in order to offer a finance facility. You can withdraw or alter at anytime subject to circumstances at the time of requests as outlined above.

### **Cookies:**

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

## Data Subject Consent Form

This document is issued electronically via our SMS service. If you are happy to agree to our Privacy Notice and consent to Infinite AND associated finance providers to process **My Personal Data** for the purpose stated above in the Customer Privacy Notice, please reply back with PN and YES.

*By granting authorisation for under this privacy notice, you are also authorising Infinite to obtain copies of any finance agreement you have entered where we are the introducer. In particular for business loan agreements where the lender may not always issue us a copy of the contract.*