

# CREATIVE ✓ E

## PRIVACY NOTICE

- ✓ Creative, creativefundingsolutions.co.uk, commercialvehicle.finance, cab.finance, fastcar.finance, hardasset.finance, horsebox.finance, Leisure Vehicle Finance, lorry.finance, motorhome.finance, racingfinance.co.uk, ambulancetradeer.co.uk, buisnessfundingsolutions.co.uk, leisurevehiclefinance.co.uk, towtruck.finance, towtruck.finance.uk, Ambulance Trader, Hire Company Finance, caravans.finance, parkhomes.finance are a trading style of Creative Funding Solutions Limited which are Commercial Finance Brokers based in Crawley, West Sussex.

Creative Funding Solutions Limited regulated by the Financial Conduct Authority, Firm Reference No. 631176 and we are acting as a credit broker and not a lender.

Creative Funding Solutions Limited is registered with the Information Commissioner's Office, Reference number: Z1809054. Creative Funding Solutions Limited is committed to processing your personal data in accordance with UK data protection laws. This Data Protection Notice aims to give you information on how your personal data (i.e., information which directly or indirectly identifies you) will be processed by Creative Funding Solutions Limited. For the purposes of UK data protection laws, Creative Funding Solutions Limited is a data controller.

## WHAT DATA DO WE COLLECT?

- ✓ Creative Funding Solutions Limited may collect certain personal data with respect to you as a customer, including, without limitation your name, address, date of birth, contact details, credit reference data, financial and employment details, banking and credit card details, and details of your business. Creative Funding Solutions Limited will collect some of this data from third parties, for example credit reference agencies. Where a corporate entity is entering into a contract Creative Funding Solutions Limited will collect personal data about the individuals who are directors and shareholders of the business from credit reference agencies where this data is held publicly, such as at Companies House. This notice also applies to the processing of such personal data and use of the word 'you' in this notice will encompass such individuals. Creative Funding Solutions Limited may process sensitive personal data (including, for example, information revealing an individual's physical or mental health). Where sensitive personal data are processed Creative Funding Solutions Limited will obtain your explicit consent for the processing.

Creative Funding Solutions Limited collects the following data:

- **Personal identification information (Name, contact details, email address, phone number, date of birth etc.)**

- **Financial status (credit profile, objectives, transaction history, banking information)**
- **home address, correspondence address (where it is different from your home address) and your address history;**
- **Your date of birth and age, to make sure that you are eligible to apply for the product and that it is suitable for you;**
- **Your nationality, if this is necessary for us to comply with our legal and regulatory requirements;**
- **Your financial health such as income and savings, summaries of expenditure, and information about any other savings or accounts;**
- **Your existing loans;**
- **Your credit history which we obtain from Credit Reference Agencies (CRAs);**
- **Your current employment status and income;**
- **Whether you own or rent your current property;**
- **Whether you have permanent right to reside in the UK;**
- **Your family background if this is relevant to the application;**
- **Where relevant, information about any guarantor provided in an application; and**
- **Some special categories of personal information such as about your health or if you are a vulnerable customer.**

However, we do not collect other special categories of personal information about the applicant such as details about race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, or genetic and biometric data. Nor do we collect any information about any criminal convictions and offences.

## HOW DO WE COLLECT YOUR DATA?

✓ You directly provide Our Company with most of the data we collect. We collect data and process data when you:

- **Register online or other communication methods for our services.**
- **Voluntarily complete a customer survey or provide feedback on any of our message boards or via email.**
- **Use or view our website via your browser's cookies.**
- **Verbally via call recording**
- **Contact using or replying to text messaging or chat messaging**
- **Reviews using third party review services such as Google Reviews or Trustpilot**
- **Provide documentation supporting a loan application**
- **Sign documentation characterizing your agreement including financial details and securities**
- **Provide identification documents to prove your identity**

Our Company may also receive your data indirectly from the following sources:

- **Credit Reference Agencies**
- **Publicly available data (e.g. Companies House)**
- **Social Media**
- **Internet**

## SPECIAL CATEGORY DATA

✓ In the course of your interactions with Creative Funding Solutions Limited you may share information that is classified as 'Special Category Data'. This could include data about:

- **Race**
- **Ethnic origin**
- **Politics**
- **Religion**
- **Trade union membership**
- **Genetics**
- **Biometrics**
- **Health**
- **Sex life**
- **Sexual orientation**

Where you do share information relating to any of these categories e.g., when you may share information about your health or a characteristic of vulnerability Creative Funding Solutions Limited will always seek explicit consent from you to store and process such information.

## HOW WILL WE USE YOUR DATA?

✓ Creative Funding Solutions Limited will use your personal data for: provision of products and services, credit, and anti-money laundering risk assessment, assessing ongoing credit performance, recoveries, collections, insurance administration, profiling for marketing purposes, market research and product development, statistical analysis, marketing, fraud prevention and detection and otherwise as necessary to comply with applicable laws, regulations and/or codes of practice. The processing of personal data may be necessary for the performance of a contractual relationship, compliance with a legal obligation, or where it is in the legitimate interests of a member of any group of companies of which Creative Funding Solutions Limited is a member.

Your acceptance of this Privacy Policy indicates clear consent for Creative Funding Solutions Limited to process your personal data for a specific purpose. Creative Funding Solutions Limited collects your data so that we can:

- Process your application and manage your request.
- Email you with special offers on other products and services we think you might like.
- To monitor the performance of products and services to ensure consumer outcomes are being achieved
- Help all parties make a fully informed risk assessment of the opportunities available
- Assess your creditworthiness;
- Verify the accuracy of the data you have provided;
- 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.

Creative Funding Solutions Limited may rely on automated credit assessment based on the personal data you provide and data which Creative Funding Solutions Limited obtains from a credit reference agency or similar sources about your credit profile or history. The outcome of this process can result in an automated decline of your application where it does not meet Creative Funding Solutions Limited's acceptance criteria. Creative Funding Solutions Limited will review this acceptance criteria regularly to ensure fairness in the decisions made. You have a right to ask Creative Funding Solutions Limited to manually review any decision taken in this manner. In addition, Creative Funding Solutions Limited may use automated profiling to identify whether other products or services may be of use to you when it considers marketing campaigns. You have a right to object to this automated profiling.

**Whilst every effort is made to ensure that any search carried out leaves no hard trace on your credit profile, once a lender decides to assess your proposal for finance they may well carry out a hard search in doing so, and you should expect them to do so. For this reason we carry out a soft search ourselves so as to pitch your proposal appropriately.**

## LAWFUL BASIS FOR PROCESSING

- Fulfilling our agreement with you to consider your options for finance;
- Complying with the law, such as anti-money laundering legislation;
- Achieving our legitimate interests as a credit broker, such as market analysis;
- Supporting the public interest or protecting your vital interests.

✓ If you agree, Our Company will share your data with our partner companies so that they may offer you their products and services. Creative Funding Solutions Limited may disclose certain personal data: (i) within the group of companies of which Creative Funding Solutions Limited is a member; (ii) to Creative Funding Solutions Limited's brokers and dealers / suppliers, professional advisors and service providers (including, information technology systems providers and recovery agents); (iii) to courts, governmental and non-governmental regulators and ombudsmen; (iv) to fraud prevention agencies and law enforcement agencies;

(v) to any third party that acquires, or is interested in acquiring, all or part of Creative Funding Solutions Limited's assets or shares, or that succeeds Creative Funding Solutions Limited in carrying on all or a part of its business, whether by merger, acquisition, reorganization or otherwise; and (vi) as otherwise required or permitted by law.

Creative Funding Solutions Limited may also pass your Personal Data on to a member of any group of companies of which Creative Funding Solutions Limited is a member and/or any relevant third party and both Creative Funding Solutions Limited and/or they may use it for any purpose linked to any sale of and/or granting of security over the agreement Creative Funding Solutions Limited has with you. In such circumstances, such third parties may also use and/or disclose your Personal Data to any third party that they ask to assist them with the preparation for and/or completion of any such sale and/or granting of security; they may also, once such sale and/or granting of security is completed, use and/or disclose your Personal Data to third parties for any of the other purposes which we have outlined in this notice in the same way as if they had entered into the agreement with you instead of us.

The personal information Creative Funding Solutions Limited will collect will be shared with fraud prevention agencies who will use it to prevent fraud and money-laundering and to verify your identity. If fraud is detected you could be refused certain services, finance, or employment. Further details of how your information will be used by Creative Funding Solutions Limited and these fraud prevention agencies, and your data protection rights can be found on Creative Funding Solutions Limited's website, details of which will be provided to you.

To process your application, Creative Funding Solutions Limited will perform credit and identity checks on you with one or more credit reference agencies ("CRAs"). To do this, Creative Funding Solutions Limited will supply your personal information to CRAs and they will give Creative Funding Solutions Limited information about you, even if your application does not proceed or is unsuccessful. This will include information from your credit application and about your financial situation and financial history. CRAs will supply to Creative Funding Solutions Limited both public (including the electoral register) and shared credit, financial situation and financial history information and fraud prevention information.

Creative Funding Solutions Limited will use this information to:

1. When you apply for finance with us, your details will be passed into a 3rd party company, Blue Owl Network Ltd trading as AutoConvert (contact details below). This organisation will check the following records about you and with their chosen Credit Reference Agencies (CRA), Equifax Ltd and Experian Ltd (contact details below).
  - a. Our own;
  - b. Up to date contact information can be found for AutoConvert at <http://www.autoconvert.co.uk>
  - c. Those at Equifax Ltd and/or Experian Ltd. When Equifax and/or Experian receives a search request from us via AutoConvert, they will place a soft quotation footprint that will be visible to you only, on your credit file, other parties including lenders will not see this. This quotation footprint will not be seen by other parties and it will not affect your credit score/rating or ability to apply for finance from other lenders.
  - d. AutoConvert will access from Equifax Ltd and/or Experian Ltd both public (including the electoral register) and shared credit and fraud prevention information. This information will be used to check your eligibility against a select group of lenders.
  - e. Those at fraud prevention agencies (FPAs).
2. We will make checks such as; assessing this application for credit and verifying identities to prevent and detect crime.
  - a. Information on applications will be sent to CRAs and will be recorded by them.
  - b. If you give us false or inaccurate information and we suspect or identify fraud we will record this and may also pass this information to FPAs and other organisations involved in crime and fraud prevention.

c. Your data may also be used for other purposes for which you give your specific permission or, in very limited circumstances, when required by law or where permitted under the terms of the Data Protection Act 2018.

How to find out more

You can contact our chosen 3rd Party, Blue Owl Network Ltd trading as AutoConvert or the Credit Reference Agencies, Equifax and Experian; the information they hold may not be the same so it is worth contacting them all.

Equifax Ltd, Customer Services Centre, PO Box 10036, Leicester, LE3 4FS or call 0800 014 2955 or visit [www.equifax.co.uk](http://www.equifax.co.uk)

Experian Ltd, The Sir John Peace Building, Experian Way, NG2 Business Park, Nottingham, NG80 1ZZ, UK <https://www.experian.co.uk/contact-us/>

AutoConvert, 1 Tony Wilson Place Manchester, M15 4FN, UK [www.autoconvert.co.uk](http://www.autoconvert.co.uk)

## CRAIN

- ✓ Creative Funding Solutions Limited may share your personally identifiable information with credit reference agencies, for example, as part of the lawful basis 'performance of a contract.' Creative Funding Solutions Limited will continue to exchange information about you with CRAs while you have a relationship with it. Creative Funding Solutions Limited will also inform the CRAs about your settled accounts. 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. When CRAs receive a search from Creative Funding Solutions Limited 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 Creative Funding Solutions Limited that you have a spouse or financial associate, Creative Funding Solutions Limited may 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. For more information on how credit reference agencies process personal data please visit [here](#).

## HOW DO WE STORE YOUR DATA?

- ✓ Our Company securely stores your data in the UK following Cyber essentials protocols independently managed and certified by an experienced provider, OneMSP. Creative Funding Solutions Limited may transfer your personal data to recipients (including a member of any group of companies of which Creative Funding Solutions Limited is a member) located in countries outside of the UK which may not have data privacy laws equivalent to those in the UK. In those instances, Creative Funding Solutions Limited will take all necessary steps to protect your personal data in accordance with applicable data privacy laws.

All the personal data we use is controlled by Creative Funding Solutions Limited in the UK, however, for the purposes of IT hosting and maintenance, this information is located on servers within the UK. No 3rd parties have access to your personal data unless the law allows them to do so. We have a Data Protection regime in place to oversee the effective and secure processing of your personal data. More information on this framework can be found on our website. Creative Funding Solutions Limited will take steps to protect your personal data against loss or theft, as well as from unauthorised access, disclosure, copying, use or modification, regardless of the format in which it is held.

We are required under The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 to keep your basic personal data, such as name, address, email, dependents, telephone numbers, date of birth, brokered agreements, and digital and physical proofs of identity for a minimum of 6 years after the end of any agreement, after which time it will usually be destroyed. Once this time period has expired, we will delete your data by a method of certified destruction.

## MARKETING COMMUNICATIONS

- ✓ Creative Funding Solutions Limited understands that with the introduction of the Consumer Duty, it is likely the level of communications issued by our business will increase. This will be necessary to support customers to understand the products and services offered and to provide support to customer throughout the lifecycle of the relationship.

Your application for finance will be submitted to one or more finance company(s) by ourselves, the supplier of the vehicle or equipment or another intermediary. On or shortly after the date on which this happens, you will be given a notice in respect of each any finance company making you an offer which will confirm its identity and provide you with further details.

Our Company would like to send you information about products and services of ours that we think you might like, as well as those of our partner companies.

If you have agreed to receive marketing, you may always opt out at a later date.

You have the right at any time to stop Creative Funding Solutions from contacting you for marketing purposes or giving your data to other members of our Group. Instructions on how to do so are provided at the bottom of any emails from us.

## WHAT ARE YOUR DATA PROTECTION RIGHTS?

- ✓ Our Company would like to make sure you are fully aware of all of your data protection rights. Every user is entitled to the following:

**The right to access** – You have the right to request Creative Funding Solutions Limited for copies of your personal data. We may charge you a small fee for this service.

**The right to rectification** – You have the right to request that Creative Funding Solutions Limited correct any information you believe is inaccurate. You also have the right to request Creative Funding Solutions Limited to complete the information you believe is incomplete.

**The right to erasure** – You have the right to request that Creative Funding Solutions Limited erase your personal data, under certain conditions.

**The right to restrict processing** – You have the right to request that Creative Funding Solutions Limited restrict the processing of your personal data, under certain conditions.

**The right to object to processing** – You have the right to object to Creative Funding Solutions Limited’s processing of your personal data, under certain conditions.

**The right to data portability** – You have the right to request that Creative Funding Solutions Limited transfer the data that we have collected to another organization, or directly to you, under certain conditions.

If you make a request, we usually have one month to respond to you. If you would like to exercise any of these rights, please contact us at our email: [info@creativefs.co.uk](mailto:info@creativefs.co.uk)

Call us at: 03302231261

Or write to us: The Data Protection Officer, Creative Funding Solutions, Ground Floor, Unit 3, Amberley Court, Whitworth Road, County Oak Way, Crawley, West Sussex, RH11 7XL

Should you wish to report a complaint or if you feel that Our Company has not addressed your concern in a satisfactory manner, you may contact the Information Commissioner’s Office at [www.ico.org.uk](http://www.ico.org.uk)