

## **Privacy Notice Full**

We take your privacy very seriously and we ask that you read this privacy notice carefully as it contains important information on who we are, how and why we collect, store, use and share personal information, your rights in relation to your personal information and on how to contact us and supervisory authorities in the event you have a complaint.

### **Who we are**

Glenhawk Financial Services Limited collects, uses and is responsible for certain personal information about you. When we do so we are regulated under the General Data Protection Regulation which applies across the European Union (including in the United Kingdom) and we are responsible as 'controller' of that personal information for the purposes of those laws.

### **The personal information we collect and use**

In the course of providing bridging loans for commercial and residential properties we collect the following personal information when you provide it to us:

- name and job title;
- address history
- contact information including email address;
- demographic information such as postcode, preferences and interests.

### **Information collected from other sources**

We also obtain personal information from other sources as follows:-

- loan and financial intermediaries who you have agreed will provide us with information to assist with your loan application;
- credit search agencies to determine your suitability for the loan; and
- your employer to determine your suitability for the loan.

### **How we use your personal information**

We use your personal information to:

- fulfil our contractual obligations;
- carry out due diligence to determine your suitability for any loans you are applying for;
- internal record keeping;
- improve our products and services;
- send you promotional emails about new products, special offers or other information which we think you may find interesting where you have provided us with consent to do so;
- contact you for market research purposes where you have provided us with consent to do so;

## **Who we share your personal information with**

We routinely share your personal data with legal advisers, credit search companies, RICS property valuers, and external finance agents for the purposes of fulfilling our obligations to you and determining your suitability for the loan you have applied for.

For a list of these organisations please contact us at [hello@glenhawk.com](mailto:hello@glenhawk.com) or telephone 0207 100 8787.

We will share personal information with law enforcement or other authorities if required by applicable law.

We will not share your personal information with any other third party.

## **Whether information has to be provided by you, and if so why**

The provision of name, address, is required from you to enable us to provide you with bridging loans for commercial and residential properties. We will inform you at the point of collecting information from you, whether you are required to provide the information to us.

## **How long your personal data will be kept**

- We will hold your personal information for the period for which your loan is in force and for a period of 6 years thereafter.

## **Reasons we can collect and use your personal information**

We rely on Contract as the lawful basis on which we collect and use your personal data i.e. the processing is necessary to fulfil our contractual obligations to you.

We also rely on consent as the lawful basis on which we collect and use your personal data where you have given clear consent for us to process your personal data to provide you with information about our products and services and any future offers and to determine your suitability for the loan you have applied for.

## **How Information about you may be used**

Personal information which you supply to Glenhawk may be used in a number of ways, for example;

- To make lending decisions
- For fraud and money laundering prevention
- For audit and debt collection
- For statistical analysis

We may share your information with and obtain information about you from credit reference agencies and other third-party companies for the use in credit decisions, for fraud and money laundering preventions and to pursue debtors.

## **Your rights**

Under the General Data Protection Regulation, you have a number of important rights free of charge. In summary, those include rights to:

- fair processing of information and transparency over how we use your use personal information;

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- access to your personal information and to certain other supplementary information that this Privacy Notice is already designed to address;
- require us to correct any mistakes in your information which we hold;
- require the erasure of personal information concerning you in certain situations;
  
- receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations;
- object at any time to processing of personal information concerning you for direct marketing;
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you;
- object in certain other situations to our continued processing of your personal information;
- otherwise restrict our processing of your personal information in certain circumstances.

For further information on each of those rights, including the circumstances in which they apply, see the Guidance from the UK Information Commissioner's Office (ICO) on individual's rights under the General Data Protection Regulation.

If you would like to exercise any of those rights, please:

- email us at [compliance@glenhawk.com](mailto:compliance@glenhawk.com), write to us at 35 Albemarle Street Mayfair London W1S 4JD or call 0207 100 8787,
- let us have enough information to identify you (e.g. your account number, full name, and address),
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill), and
- let us know the information to which your request relates, including any account number.

If you would like to unsubscribe from any email newsletter you can also click on the 'unsubscribe' button at the bottom of the email newsletter. It may take up to 14 days for this to take place.

## **Credit reference checks**

When you apply for a new product, we will perform credit and identity checks on you (and certain individual(s) connected to your business) with one or more credit reference agencies (CRAs).

To do this, we'll supply your information (and information of certain individual(s) connected to your business) to CRAs and they'll give us information about you and them. This will include information from your loan application and about your financial situation and financial history (and the financial situation and history of the relevant individual(s) connected to your business). CRAs will supply us

with both public (including the electoral register) and shared credit information, financial situation, history and fraud prevention information.

We may use this information to:

- assess if we can offer you a loan and whether you can afford the servicing of the product offered to you;
- verify the accuracy of the data you've provided to us;
- prevent criminal activity, fraud and money laundering;
- trace and recover debts; and
- ensure any offers provided to you are appropriate to your circumstances.

We'll continue to exchange information about you (and individual(s) connected to your business) with CRAs for the duration of your relationship with us. We'll also inform the CRAs about your repayment history. If you borrow and do not repay on time and in full, CRAs will record the arrears. This information may be supplied to other organisations by CRAs.

When we send a search request to CRAs they'll place a search footprint on your credit file (or that of the relevant individual(s) connected to your business) that may be seen by other lenders. We may use this information to verify the accuracy of the information you've provided to us, to prevent criminal activity, fraud and money laundering, to trace and recover debts and to ensure any offers provided to you are appropriate to your circumstances.

If you inform us of financial associate(s) (this may include a spouse), we'll link these records together. Please discuss this with the individual(s) and share this information with them before submitting the application. Your records (and those of individual(s) connected with your business) will also be linked by the CRAs and these links will remain on both files until you or the relevant individual 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 information, data retention periods and data protection rights with the CRAs are explained in more detail on their websites. They've created a joint document called the Credit Reference Agency Information Notice (CRAIN) which is accessible from each CRAs – clicking on any of the links below will also take you to the same CRAIN document:

#### **Credit reference agencies:**

- Call Credit – [www.callcredit.co.uk/crain](http://www.callcredit.co.uk/crain)
- Equifax – [www.equifax.co.uk/crain](http://www.equifax.co.uk/crain)
- Experian – [www.experian.co.uk/crain](http://www.experian.co.uk/crain)

To comply with EU regulations and to enable us to assess and manage risk, we will share details about your financial situation and history with us (and that of the individual(s) connected to your business with CRAs, fraud prevention agencies, etc. This includes information on any loan facility you have with us.

#### **Keeping your personal information secure**

We have appropriate security measures in place to prevent personal information from being accidentally lost, used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

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If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit [www.getsafeonline.org](http://www.getsafeonline.org). Get Safe Online is supported by HM Government and leading businesses.

## **How to complain**

We hope that we can resolve any query or concern you raise about our use of your information.

The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113.

## **Changes to this privacy notice**

This privacy notice was published on 1<sup>st</sup> May 2018 and updated 24<sup>th</sup> May 2018.

We may change this privacy notice from time to time. You should check this policy occasionally to ensure you are aware of the most recent version.

## **How to contact us**

Please contact us if you have any questions about this privacy notice or the information we hold about you.

If you wish to contact us, please send an email to [compliance@glenhawk.com](mailto:compliance@glenhawk.com), write to us at 35 Albemarle Street Mayfair London W1S 4JD or call 0207 100 8787.