

Privacy policy

Who are we?

We are Selina Finance Limited of 14 Hanway Place, London, W1T 1HD (info@selinafinance.co.uk; +44 20 8133 0157) (“Selina”). Selina is a digital consumer lender, we provide flexible and affordable financing by unlocking our customer’s home equity.

What does this Privacy Policy cover?

At Selina, we take your personal data seriously. This policy:

- sets out the types of personal data that we collect about you;
- explains how and why we collect and use your personal data;
- explains how long we keep your personal data for;
- explains when, why and with who we will share your personal data (including credit reference agencies and fraud prevention agencies);
- sets out the legal basis we have for using your personal data;
- explains the effect of refusing to provide the personal data requested;
- explains where we store your personal data and whether we transfer your data outside of the EEA;
- explains the different rights and choices you have when it comes to your personal data; and
- explains how we may contact you and how you can contact us

What personal data do we collect about you?

We collect the information necessary to be able to assess whether you are eligible to use our product, to determine the terms corresponding to your risk profile and to deliver our product/services to you. The information we need to do this includes:

- Bank account details
- Copies of bank & mortgage statements
- Copies of Identification documents such as Passport
- General information (such as, date of birth, address, contact details, educational background etc.)
- Job information (such as company name, address, contact details)
- Information on the financial background (such as income sources, assets, outstanding loans etc.)
- Additional questions on potential County Court Judgements, government schemes, Individual Voluntary Agreements, Personal Liabilities, Debt Management Plans or bankruptcy declarations in place
- Property information (such as address, property type, construction year, size etc.)
- Mortgage information (such as loan size, outstanding balance, interest rate etc.)

How and why we use your personal data?

We use your personal data to:

- Assess your eligibility for a Selina Loan and assign a risk profile to you in order to determine your loan terms;
- Administer your relationship with us and to communicate with you by telephone, mail, email, text (SMS) message, instant messaging or other electronic means;
- Verify your identity as part of our identity authentication process and to prevent, detect and prosecute fraud and crime and comply with legal or regulatory requirements;
- Provide you with the information, products and services that you request from us;

- Where you have provided your consent for us to market to you, provide you with information about other products and services we offer that are similar to those that you have already purchased or enquired about or about products or services we feel may interest you or be best for you.

How long do we keep your personal data for?

How long we keep your information will depend on the purpose for which we use it. While you are a customer of ours, we will only retain your information for as long as is necessary for those purposes.

In accordance with our data retention policy, we will retain your personal information for a minimum of six years from the end of our business relationship with you. Our business relationship will be deemed to be at an end on the date upon which your account is closed (which will either be when all outstanding sums under the agreement have been repaid or when we stop pursuing arrears on the account) or when your application has been declined.

Please note that if your personal information is shared with third parties, they may have different retention policies. Fraud prevention agencies can hold your personal data for different periods of time; if you are considered to pose a fraud or money laundering risk, note that your data can be held by them for up to six years.

After termination of your loan contract, we may continue to use anonymised data (which does not identify individuals) which is aggregated with anonymised

data of other individuals. We use this aggregated anonymised data for data analysis, profiling and research purposes, for example to gain insights about our customers.

Who do we share your personal data with?

Your personal data may be shared with credit scoring agencies, fraud prevention agencies and government agencies (for more detail, see 'Credit scoring agencies, fraud prevention agencies and government agencies' below). We will also share your personal data with the land registry in order to establish the charge over your property.

Credit scoring agencies, fraud prevention agencies and government agencies

If you make an application to use our services, we will obtain on your behalf copies of your credit report and credit score from designated credit scoring agencies. In order to provide these services to you, we will share your information with such credit scoring agencies. This credit history search will leave a footprint on your credit file.

Credit scoring agencies collect and maintain information about consumers' and businesses' credit behaviour. This includes fraud prevention, and credit information (including details of previous applications and the conduct of your bank accounts) and publically accessible information such as information from

the Electoral Register, County Court Judgements, decrees, and bankruptcies. Credit scoring agencies may form a link between any previous or subsequent names that you use in the records they hold about you.

Provide to credit reference agencies about you, your financial associates (individuals you have made a joint application with or are otherwise linked to your credit history) and your business (if you have one) may be provided to other organisations. This information is used by them and us to:

- help make decisions, for example when: (a) checking details on applications for loans or other credit and credit-related or other facilities; (b) managing loan, credit and credit-related accounts or facilities; (c) recovering debt; (d) checking details on proposals and claims for all types of insurance; (e) checking details of job applicants and employees;
- detect and prevent crime, fraud and money laundering;
- check your credit history;
- verify your identity if you, or someone financially linked with you, apply for a loan or services
- trace your whereabouts; and
- undertake research, statistical analysis and systems testing.

To do this, we will supply your personal information to credit scoring agencies (CRAs) and they will give us information about you. This will include information from your credit application and about your financial situation and financial history. CRAs will supply to us both public (including the electoral register) and shared credit, financial situation and financial history information and fraud prevention information.

We will use this information to:

- Assess your creditworthiness and whether you can afford to take the product;
- Verify the accuracy of the data you have provided to us;
- 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.

We will continue to exchange information about you with CRAs while you have a relationship with us. We 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 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 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 at www.experian.co.uk/crain CRAIN is also accessible from each of the three CRAs.

- Call Credit:
www.callcredit.co.uk/crain
- Equifax
www.equifax.co.uk/crain
- Experian:
www.experian.co.uk/crain

We also have processes and systems that protect our customers and ourselves against fraud and other crime. We will share your personal information with fraud prevention agencies and government agencies in order to help us to identify instances of fraud and trace those responsible. If false or inaccurate information is provided and fraud is identified, details of this fraud will be passed to these agencies. Law enforcement agencies may access and use this information.

Other organisations may also access and use this information to prevent fraud and money laundering, for example, when:

- checking details on applications for credit and credit related or other facilities;
- managing credit and credit related accounts or facilities;
- recovering debt;
- checking details on proposals and claims for all types of insurance; and
- checking details of job applicants and employees.

We and other organisations may access and use from other countries the information recorded by fraud prevention agencies.

What legal basis do we have for using your personal data?

We need you to give us the information you provide, and which we collect about you from the credit scoring agencies or other third parties, in order for us to provide you with our services as agreed in our contract with you. We cannot

provide our services to you without collecting the information you give us when you register with us because we need certain information from you to be able to assess your suitability for the financial products and services we provide.

For other kinds of information we process (such as from the land registry or individual home appraisals), this is necessary in pursuit of our legitimate interests in establishing a charge over your property or adequately assessing your risk profile and property value.

While there are some risks with this type of activity, on balance, we consider the risk to your rights of data protection is outweighed by the significant benefits in being able to provide you with 1) a fair rate and maximum loan amount accessible 2) the best customer service possible and 3) with a product that is suitable for your needs.

We've also implemented protections for your rights by establishing adequate cyber security in order to protect your data privacy.

You have the right to object, on grounds relating to your particular situation, at any time to the processing of your personal data which is based on our legitimate interests. More information on this right and on how to exercise it is set out in 'What rights do you have in relation to the personal data we hold on you?' below.

We may also use your personal data to comply with our legal obligations, including our obligations to regulators.

We will always seek your consent to process certain types of information where we are legally required to do so.

What happens if you do not provide us with the information we request or ask that we stop processing your information?

If you do not provide the personal data necessary, or (where we are relying on your consent) if you withdraw your consent for the processing of your personal data, we may not be able to provide you with our products or services.

Do we make automated decisions concerning you?

We use an automated decision-making system to perform credit scoring/property value assessment activities and make determinations concerning your suitability for certain financial products and services.

We do so by using an automated decision-making system to verify the financial details you provide us against those held by third-party providers, as well as to benchmark with our risk scoring guidelines. If you do not pass the check using the automated system, we cannot provide our goods or services to you without being able to verify your identity.

Moreover, using an automated decision-making system enables us to provide you with the fairest rate possible, as well as minimize the risk to grant you a loan for which are possibly not eligible.

You have the right not to be subject to a decision based solely on automated processing, including profiling, which has legal consequences for you or similarly significant effects. While we are confident that the technology works, we understand that not everyone is comfortable with decisions being left entirely up to machines. If you have any questions about our identity checking system, please contact us on info@selinafinance.co.uk or +44 20 8133 0157.

Do we use Cookies to collect personal data on you?

We may use cookies and similar technologies on our websites and in our emails. A 'cookie' is a small text file sent from a website and stored on the user's computer by the user's web browser. Upon visiting a site that uses cookies, a cookie is downloaded onto your computer or mobile device. The

next time you visit that site, your device will remember useful information such as preferences, visited pages or logging in options.

Cookies are widely used to add functionality to websites, or to ensure they work more efficiently. Our site relies on cookies to optimise the user experience and ensure the sites services function properly.

We may use third party marketing cookies to help deliver advertising relevant to your interests. These include:

- Facebook – You can learn more about Facebook cookies and how you can control them at <https://www.facebook.com/policies/cookies/>
- Google/Youtube – You can learn more about Google cookies and how you can control them at <https://policies.google.com/technologies/cookies>
- LinkedIn – You can learn more about LinkedIn cookies and how you can control them at <https://www.linkedin.com/legal/cookie-policy>
- Taboola – You can learn more about Taboola cookies and how you can control them at <https://www.taboola.com/cookie-policy>

Most web browsers allow some control to restrict or block cookies through the browser settings, however if you disable cookies you may find this affects your ability to use certain parts of our website or services. For more information about cookies please visit <https://www.aboutcookies.org>.

Third Party Processors

We use third party processors to provide our services; these companies will process or store your information on our behalf. We use the following third parties:

- We use webgo.de to host our website. For more information about webgo.de, please read their data protection policy at <https://www.webgo.de/datenschutz/>
- We use Google to provide web analytics, advertising, collaboration services, email and storage. For more information about Google, please read their privacy policy at <https://policies.google.com/privacy>
- We use HotJar to provide web analytics. For more information about HotJar, please read their privacy policy at <https://www.hotjar.com/legal/policies/privacy>
- We use Taboola to provide advertising. For more information about Taboola, please visit their trust center at <https://help.taboola.com/hc/en-us/articles/360004904154-Taboola-s-Trust-Center>
- We use Facebook to provide advertising. For more information about Facebook, please read their privacy policy at <https://www.facebook.com/about/privacy>
- We use LinkedIn to provide advertising. For more information about LinkedIn, please read their privacy policy at <https://www.linkedin.com/legal/privacy-policy>
- We use Intercom.io to provide web chat services. For more information about Intercom.io, please read their privacy policy at <https://www.intercom.com/terms-and-policies#privacy>
- We use Caldera Forms to provide web form services. For more information about Caldera Forms, please read their privacy policy at <https://calderaforms.com/pro/pro-privacy-policy/full>

International Transfers

Your personal data may be processed in the USA by us or the third parties we use. Where these transfers outside the EU take place, we will ensure the same high standard of protection for your personal data at all times.

What rights do you have in relation to the personal data we hold on you?

1. The right to be informed

You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. This is why we're providing you with the information in this Policy.

2. The right of access

You have the right to obtain access to your information (if we're processing it), and certain other information (similar to that provided in this Privacy Policy).

This is so you're aware and can check that we're using your information in accordance with data protection law.

3. The right to rectification

You are entitled to have your information corrected if it's inaccurate or incomplete.

4. The right to erasure

This is also known as 'the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of your information where there's no

compelling reason for us to keep using it. This is not a general right to erasure; there are exceptions.

5. The right to restrict processing

You have rights to 'block' or suppress further use of your information. When processing is restricted, we can still store your information, but may not use it further. We keep lists of people who have asked for further use of their information to be 'blocked' to make sure the restriction is respected in future.

6. The right to data portability

You have rights to obtain and reuse your personal data for your own purposes across different services. For example, if you decide to switch to a new provider, this enables you to move, copy or transfer your information easily between our IT systems and theirs safely and securely, without affecting its usability.

7. The right to object to processing

You have the right to object to certain types of processing, including processing for direct marketing (i.e. if you no longer want to be contacted with potential opportunities).

8. The right to lodge a complaint

You have the right to lodge a complaint about the way we handle or process your personal data with your national data protection regulator. The contact details for the UK Information Commissioner's Office is provided below.

9. The right to withdraw consent

If you have given your consent to anything we do with your personal data, you have the right to withdraw your consent at any time (although if you do so, it does not mean that anything we have done with your personal data with your consent up to that point is unlawful). This includes your right to withdraw consent to us using your personal data for marketing purposes.

We act on all requests within 30 days, and provide the information free of charge, however we may charge a reasonable fee to cover our administrative costs of providing the information for:

baseless or excessive/repeated requests, or further copies of the same information.

Alternatively, we may be entitled to refuse to act on the request.

Please consider your request responsibly before submitting it. We'll respond as soon as we can. Generally, this will be within one month from when we receive your request but, if the request is going to take longer to deal with, we'll come back to you and let you know.

How will we contact you?

We may contact you by phone, email or postal mail. If you prefer a particular contact means over another please just let us know.

Where you have consented we may send you messages by post, telephone, text, email and other digital methods (including new methods that may become available in the future) about products and services which may be of interest to you – these are marketing messages. You can ask us to stop or start sending you marketing messages at any time by contacting us or using the opt in or out links in our emails.

Where we make any significant changes to this privacy notice, we will contact you to ensure that you are aware of the changes. We may also make minor updates to this privacy notice without notifying you but will ensure that the updated version is available online.

How can you contact us?

If you are unhappy with how we've handled your information, or have further questions on the processing of your personal data, contact us here:

Address: 14 Hanway Place, London, W1T 1HD, London, United Kingdom

Telephone number: 020 8133 0157

Email: info@selinafinance.co.uk

If you're not satisfied with our response to any complaint or believe our processing of your information does not comply with data protection law, you can make a complaint to the Information Commissioner's Office (ICO) using the following details:

Address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Telephone number: 0303 123 1113

Website: www.ico.org.uk

Our Information Commissioner's Office (ICO) registration number is ZA514769