

## fair processing notice.

Below we outline how your personal information is collected, used, stored, and protected to ensure transparency and confidence that the data is handled responsibly.

We have been asked to assist your business in obtaining finance. This process will involve the processing of your personal data. This Data Protection Notice is intended to give you information on how this personal data (i.e., information which directly or indirectly identifies you) will be processed by any company to which we submit a finance application on behalf of your business. We have not yet identified the finance company or companies to which such an application should be submitted. You will be given details in due course of their identity, but for present purposes, we will refer to any such company in this notice as "the Company".

For the purposes of EU data protection laws, the Company will be a data controller.

### data that may be collected.

The Company may collect certain personal data with respect to you, including, without limitation, your name, address, date of birth, contact details, credit reference data, financial and employment details, banking and credit card details, director or shareholder roles, income and details of your business. The Company may collect some of this data from third parties, for example, credit reference agencies.

Where your business is a corporate entity, the Company may collect personal data about the directors and shareholders of the business from credit reference agencies where this data is held publicly, such as at Companies House.

### use of personal data.

The Company will use your personal data for the provision of products and services, credit and AML risk assessment, 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 the Company or a member of any group of companies to which the Company belongs.

### disclosure to certain third parties.

The Company may disclose certain personal data: (i) within any group of companies to which the Company belongs; (ii) to the Company's brokers and dealers/suppliers, professional advisors and service providers (including information technology systems providers); (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 the Company's assets or shares, or that succeeds the Company in carrying on all or a part of its business, whether by merger, acquisition, reorganisation or otherwise; and (vi) as otherwise required or permitted by law.

In particular, the Company may share the personal data it collects 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 us and these fraud prevention agencies and your data protection rights can be found at <https://circle.cloud/privacy-policy/> or by contacting the Data Privacy Officer(s) whose details will be given to you at the same time as you are informed about the identity of the Company.

In addition, in order to process your application for finance, your personal data will be shared with credit reference agencies (CRAs). The Company will send information about your applications to CRAs, and they will record this, even if your business application does not proceed or is unsuccessful. This will include information from your credit application and about your financial situation and financial history. CRAs can give the Company both public information (e.g. electoral register) and shared credit, financial situation and financial history information and fraud prevention information.

The Company may use the data received to:

- 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.

The Company may continue to exchange information about you with CRAs while you have a relationship with them and may 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 the Company, 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 the Company that you have a spouse or financial associate, the Company 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.

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 each of the three CRAs websites - using any of these three addresses will take you to the same CRAIN document: 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)

### transfer of personal data outside the european economic area ("eea").

The Company may transfer your personal data to recipients (including affiliates) located in countries outside of the EEA, which may not have data privacy laws equivalent to those in the EEA. In such a case, the Company is under a duty to take all necessary steps to ensure the safety of your personal data in accordance with applicable data protection laws.

Your rights. Under applicable EU data privacy laws, you may have a right to: (i) request access to and rectification or erasure of your personal data; (ii) obtain restriction of processing or to object to the processing of your personal data; and (iii) data portability (i.e. to request the transfer of personal data from one data controller to another in certain circumstances). If you wish to exercise any of these rights, you should contact the Data Privacy Officer(s) whose details will be given to you at the same time as you are informed about the identity of the company. You also have the right to lodge a complaint about the processing of your personal data with your local data protection authority.

The Company may rely on automated credit assessment based on the personal data which we provide to it and data which it 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 the Company's acceptance criteria. The Company has a duty to review these acceptance criteria regularly to ensure fairness in the decisions made, and you have a right to ask it to manually review any decision taken in this manner.

### security.

The Company is under a duty to 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.

### retention.

When you are informed of the identity of the Company, you will also be informed of the policy it adopts regarding the retention of your personal data.

### enquiries, requests or concerns.

All enquiries, requests or concerns regarding this Notice or relating to the processing of Personal Data should be sent to our Data Privacy Officer, Axel Molist Cordina, using the following contact details.

### contact details.

Company Name: Circle Cloud Communications Ltd  
Registered Office: Circle Cloud Communications Ltd, Ariadne House, Town Quay, Southampton, SO14 2AQ.

Tel: 0333 043 6600  
Email: [info@circle.cloud](mailto:info@circle.cloud)  
Web: [www.circle.cloud](http://www.circle.cloud)

customer service contact:  
Tel: 0333 043 6600  
Email: [support@circle.cloud](mailto:support@circle.cloud)

