



EDGEFERN

# | EdgeFern Limited | Privacy Policy

# Privacy Policy

Your personal information and how we use it

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# Privacy Policy

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## How we use your personal information

Edgefern Limited, 96 Cassidy House, Station Road, Chester, CH1 3DW is a data controller of your Personal Data. Our Data Protection Officer can be contacted by writing to Edgefern Limited, 96 Cassidy House, Station Road, Chester, CH1 3DW.

## Information we collect and hold about you

To enable us to provide you with a loan account, a product, a service or otherwise introduce you to a third party, we require certain information about you. Most of this will be provided by you when you make your application and contained within this form. This includes:

- Your title, full name, contact details (including, for instance, your email address, home and mobile telephone numbers);
- Your home address and correspondence address (where this is different from your home address) and for mortgage accounts only, your address history;
- Your date of birth, to ensure that you are eligible to apply for the product and/or that it is suitable for you;
- Your nationality (where this is necessary for us to comply with our legal and regulatory requirements);
- Records of how you have contacted us and, if you get in touch with us online, details such as your mobile phone location data, IP address and device attributes, such as MAC address; and
- Where applicable, some special categories of personal data such as information about your health or if you have special circumstances which may require us to tailor how we communicate with you

We may also collect:

- Certain financial information (such as information about your employment status/salary/income, details of your savings and details of your expenditure, including borrowings and loans);
- Details of other account(s) held with other providers, as necessary (for example, other current/savings/loan/mortgage accounts where you may pay a mortgage from);
- Information about your occupier status, such as whether you are a tenant, live with parents or are an owner occupier of the property in which you live at the time of your application;
- Information which is relevant for your residency and/or citizenship status, such as your nationality, your length of residency in the UK and/or whether you have the permanent right to reside in UK;
- To assess the suitability of the mortgage product and the loan amount, we will ask you questions about your household and family circumstances and if you have any financial dependents; and

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- Where relevant, information about any guarantor which you provide in any application.

As part of your loan application, we may also obtain information from third party sources (as applicable) such as:

- Personal information about your credit history, which we obtain from Credit Reference Agencies including data which originates from:
  - Royal Mail (UK postal addresses);
  - Local Authorities (electoral roll);
  - the Insolvency Service;
  - Companies' House;
  - other lenders and providers of credit (who supply data to the Credit Reference Agencies);
  - Court Judgments Decrees; and administration orders made publicly available through statutory public registers;
  - Her Majesty's Revenue and Customs (HMRC);
  - Department for Work and Pensions (DWP);
  - any representatives you appoint to act on your behalf, for example: any mortgage intermediary or Solicitor;
  - your employer;
  - your landlord;
  - our representatives or agents for example: debt recovery and/or tracing agents; or
  - third parties where we act as their representative or agent.

## If you have been introduced to us by an intermediary/broker

All applications are processed by us directly. You should contact us to exercise your rights under data protection laws. When a mortgage intermediary processes your personal information as a data controller in its own right, its own privacy notice will apply and you should ask them for a copy if you do not have one by the time you are introduced to us.

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## Credit reference agencies

In order to process your application, we will perform credit and identity checks on you with one of more credit reference ("CRAs"). Where you take loan facilities from us we may also make periodic searches at CRAs to manage your account with us.

To do this, we will supply your personal information to CRAs and they will give us information about you. This will include information from your loan 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 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 <https://www.equifax.co.uk/CRAIN.html>.

CRAIN is also accessible from each of the three CRAs –

- CRAIN document: Callcredit <https://www.callcredit.co.uk/crain>;
- Equifax <https://www.equifax.co.uk/CRAIN.html>;
- Experian <https://www.experian.co.uk/crain/index.html>.

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### Fraud prevention agencies

The personal information we collect from you 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 in future.

Under data protection laws, we can only process your personal data for certain reasons (including when we share it with other organisations). Below, we set out these reasons:

#### **Processing is necessary to perform our contract with you for your loan or for steps prior to entering into it (during the application stage) and for us to comply with our legal obligations:**

- In order to enter into a contract with you and to comply with our legal obligations, we will process your personal information, as set out below:
  - > At all stages relevant to opening and managing your account including:
    - > updating our records;
    - > to carry out monitoring and to keep records;
    - > tracing your whereabouts to contact you about your account.
    - > recovering of any debt;
    - > providing you with illustrations;
    - > dealing with requests of additional lending or other changes to your loan;
- For compliance with laws which apply to us;
- To administer our governance requirements such as internal reporting and compliance obligations or statutory administration required for AGM processes;
- For establishment, defence and enforcement of our legal rights;
- For activities relating to the prevention, detection and investigation of crime;
- To carry out identity checks, anti-money laundering checks, and checks with Fraud Prevention Agencies at pre-application, at the application stage, and periodically after that;
- To process information about a crime or offence and proceedings related to that (in practice this will be relevant if we know or suspect fraud);
- To deal with requests from you to exercise your rights under data protection laws;
- Where we carry out profiling and/or automated decision making (see glossary for further information regarding profiling and automated decision making);
- Where we share your personal information with:
  - > Joint account holders, trustees and beneficiaries and any person with power of attorney over your affairs (in each case only if relevant to you);
  - > Other payment services providers, such as when you ask us to share information about your account with them;

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- > Third party product providers that we introduce you to (or where we act as their agent), when you ask us to share information about you with them;
- > Any intermediary who introduced you to us;
- > If you have a loan with us, we may share information with other lenders who hold a charge on the property;
- > Our legal and other professional advisers, auditors and actuaries;
- > Our valuers who undertake property valuations on our behalf;
- > Courts and to other organisations where it is necessary for the administration of justice, to protect vital interests and to protect the security or integrity of our business operations; and
- > Law enforcement agencies and governmental and regulatory bodies, such as:
  - > HMRC including tax authorities who are overseas, for instance, if you are subject to tax in another jurisdiction we may share your personal information directly with relevant tax authorities overseas (instead of via HMRC);
  - > the Financial Conduct Authority;
  - > the Financial Ombudsman Service;
  - > the Information Commissioner's Office;
  - > the Financial Services Compensation Scheme;

## Legitimate Interests:

The UK's data protection laws allows the use of personal data where its processing is legitimate and isn't outweighed by the interests, fundamental rights or freedoms of data subjects. We will use your personal information for the following legitimate interests:

- a. To test the performance of our products, services and internal processes;
- b. To adhere to guidance and best practice under the regimes of governmental and regulatory bodies, such as:
  - > HMRC;
  - > the Financial Conduct Authority;
  - > the Prudential Regulation Authority;
  - > the Financial Ombudsman Service;
  - > the Information Commissioner's Office;
  - > the Financial Services Compensation Scheme;
- c. For management and audit of our business operations, including accounting;
- d. To carry out searches at CRAs at pre-application, at the application stage, and periodically after that;
- e. To carry out monitoring and to keep records;
- f. For market research and analysis and developing statistics; and
- g. Where we share your personal information with:
  - > Other organisations and businesses who provide services to us, such as debt recovery agencies, back up and server hosting providers, IT software and maintenance providers, document storage providers and suppliers of other back office functions;

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- > Buyers and their professional representatives as part of any restructuring or sale of our business or assets; and
- > Market research organisations who help us to develop and improve our products and services.

## Processing with your consent:

There may be certain circumstances, where we need to obtain your consent, such as:

- When you request that we share your personal information with someone else and consent to that;
- For some of our processing of special categories of personal data such as about your health or if you have special circumstances which may require us to tailor how we communicate with you (it will be explained to you when we ask for that explicit consent what purposes, sharing and use it is for); and
- To keep you informed about our products and/or services.

Processing for a substantial public interest under laws which apply to us where this helps us to meet our broader social obligations such as:

- Processing of your special categories of personal data such as information about your health or if you have special circumstances which may require us to tailor how we communicate with you; and
- Processing that we need to do to fulfil our legal obligations and regulatory requirements.

## How and when can you withdraw your consent?

For processing that is based on your consent, you have the right to withdraw your consent. You can do this by contacting us using the details above. The consequence might be that we cannot send you marketing communications or that we cannot take into account special categories of personal data, such as about your health or if you have special circumstances which may require us to tailor how we communicate with you. If withdrawing your consent, has any other consequences, we will advise you of this at the time you make the request.

## Is your personal information transferred outside the UK or the EEA?

We are based in the UK but sometimes your personal information may be transferred outside the UK or the European Economic Area. If it is processed within Europe or other parts of the European Economic Area (EEA) then it is protected by European data protection standards. Some countries outside the EEA do have adequate protection for personal information under laws that apply to us.

We will make sure that suitable safeguards are in place before we transfer your personal information to countries outside the EEA which do not have adequate protection under laws that apply to us.

Safeguards include contractual obligations imposed on the recipients of your personal information. Those contractual obligations require the recipient to protect your personal information to the standard required in the European Economic Area. Safeguards also include requiring the recipient to subscribe to 'international frameworks' intended to enable secure data sharing and where the framework is the means of protection for the personal information.

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### What should you do if your personal information changes?

You should tell us without delay so that we can update our records. You can do this by:

- writing to us at Edgefern Limited, 96 Cassidy House, Station Road, Chester, CH1 3DW;
- calling us on 01244 617 368;

If you were introduced to us by an intermediary, you should inform them separately. In some cases, where you exercise rights against us under data protection laws (see below), we may need to inform the intermediary, but this will not always be the case.

### Do you have to provide your personal information to us?

We are unable to provide you with a loan or to process your application or introduce you to a third party at your request, without having personal information about you. Your personal information is required:

- before you can enter into the relevant contract with us;
- during the life of that contract; and
- it is required by laws that apply to us.

If we already hold some of the personal information that we need - for instance if you are already a customer - we may not need to collect it again when you make your application. In cases where providing personal information is optional, we will make this clear in the application form.

### Do we do any monitoring involving processing of your personal information?

In this section, monitoring means any listening to, recording of, viewing of, intercepting of, or taking and keeping records (as the case may be) of calls, emails, text messages, social media messages and other communications. We may only monitor where permitted by law and we will do this where the law requires it.

Some of our monitoring may be to comply with regulatory rules, self-regulatory practices or procedures relevant to our business, to prevent or detect crime, in the interests of protecting the security of our communications systems and procedures, to have a record of what we have discussed with you and actions agreed with you, to protect you and to provide security for you (such as in relation to fraud risks on your account) and for quality control and colleague training purposes. Some of our monitoring may check for obscene or profane content in communications.

We may conduct short term, carefully controlled, monitoring of your activities on your loan account, where this is necessary for our legitimate interests or to comply with our legal obligations. For instance, where we suspect fraud, money laundering, or other crimes.

Telephone calls between us and you in connection with your application, loan account may be recorded to make sure that we have a record of what has been discussed and what your instructions were. We may also record these types of calls for quality control and colleague training purposes.

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## How long is your personal information retained by us?

We will keep your personal information for as long as you are a customer of ours.

After you stop being a customer, we may keep your data for up to 20 years for the following reasons:

- To respond to any queries or complaints;
- To maintain records according to rules that apply to us; and
- For research and statistical purposes to ensure we continue to make informed lending decisions and understand the performance of our products

We may keep your data for longer than 20 years if we cannot delete it for legal, regulatory or technical reasons. If you would like further information about our data retention practices please contact our Data Protection Officer.

## What are your rights under data protection laws?

Here is a list of the rights that all individuals have under data protection laws. These include:

- The right to be informed about your processing of your personal information;
- The right to have your personal information corrected if it is inaccurate and to have incomplete personal information completed;
- The right to object to processing of your personal information;
- The right to restrict processing of your personal information;
- The right to have your personal information erased (the “right to be forgotten”);
- The right to request access to your personal information and to obtain information about how we process it (please see below for further information);
- The right to move, copy or transfer your personal information (“data portability”);
- Rights in relation to automated decision making which has a legal effect or otherwise significantly affects you.

You also have the right to complain to the Information Commissioner’s Office who regulates data protection laws.

You can find further information by visiting: [www.ico.org.uk](http://www.ico.org.uk) or by calling the ICO on 0303 123 1113. If you wish to exercise any of these rights against the CRAs, the Fraud Prevention Agencies, or intermediary, who is a data controller in its own right, you should contact them separately.

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## How to get a copy of your personal information (Data Subject Access Request)

You can obtain a copy of your personal information held by us by writing to Edgefern Limited, 96 Cassidy House, Station Road, Chester, CH1 3DW;

We'll need address verification and identification documents for each individual making a Data Subject Access Request.

Original or certified address verification and certified identification documents which are acceptable include:

- Utility bill (dated within the last 3 months - mobile phone bills not accepted)
- Council tax bill (for the current year)
- Bank statement (dated within the last 3 Months)
- Mortgage statement from a recognised lender for the current year
- Driving license, which shows your current address
- Passport

We can accept photocopies of ID but these must be certified and stamped either by a Edgefern Limited employee, an accountant, solicitor or an independent financial advisor. It has to be clear that the ID has been certified by one of these people, providing their name and business address.

We'll deal with your request as quickly as possible, but in no more than 30 calendar days from receipt of all required identification.

## Data anonymisation and use of aggregated information

Your personal information may be converted into statistical or aggregated data which means it can no longer be used to identify you. It may then be used to produce statistical research and reports.

## YOUR AGREEMENT

**For your own benefit and protection, you should read the declarations and notifications contained in the Company Application Form before continuing with any application for Bridging Finance. By continuing, you agree to these declarations, and the Contents of this Privacy Policy and that we can you use your Personal Information as described above. If you do not understand anything within these sections, please contact us to seek clarification before you continue.**

Edgefern Limited is registered in England and Wales,  
Company Registration Number 12369107

**Edgefern Limited**

96 Cassidy House, Station Road,  
Chester, CH1 3DW

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