## **Harper Financial Commercial Solutions: Privacy Notice**

#### Who we are

Harper Financial Commercial Solutions is a trading style of Harper Financial Ltd who are Commercial Finance Brokers and are an appointed representative of Commercial Finance Brokers UK Limited who are regulated by the FCA, No 736199. We act as a broker for our customers. Harper Financial Ltd are Authorised and Regulated by the Financial Conduct Authority No 1010571

#### How we will use the information about you

Here at Harper Financial Commercial Solutions and Commercial Finance Brokers UK Limited we take your privacy seriously and will use your personal information in a number of ways which will help us approach lenders in order to obtain an offer of finance for any project you instruct us to seek finance for.

We may share your information with, and obtain information about you from, credit reference agencies or fraud prevention agencies.

We may also share details about you and any offer of finance to any lender, guarantor (intended or otherwise), and your legal, property or accounting advisors as well as to any individual or firm who may have introduced you to us in the first place.

In addition to the above, we will not disclose your information to any company or individual other than in connection with obtaining the finance you seek except to help prevent fraud or if required by law to do so.

If you are an introducer we will use your data solely to contact you with information about Harper Financial Commercial Solutions and Commercial Finance Brokers UK Limited about the services we can offer. We will never provide your data to 3rd parties.

For further information on how your information is used, how we maintain the security of your information and your rights to access/alter and change information we hold on you, please contact Michael Harper or Karl MALLETT at Commercial Finance Brokers UK Limited on 0800 999 2015 or <a href="mailto:karlmallett@cfbuk.org">karlmallett@cfbuk.org</a>

### **Additional Marketing**

If you are a customer, we will not use your data for marketing purposes. If you are an introducer, we will contact you from time to time with details of our services

# Your Personal Data – customers/clients:

### What we need

Harper Financial Commercial Solutions and Commercial Finance Brokers UK Limited will be what is known as the "data controller" of the personal data you provide to us. We collect personal data about you which may also include any special types of information or location-based information.

In order to meet our contractual obligations to you to source an offer of finance for your consideration we will gather information in the following areas:

- Personal information eg your name, date of birth, marital status, family status,
- Your contact information eg phone numbers, personal and business address, email addresses
- Financial information eg bank, credit card and mortgage statements, statements of your assets & liabilities; statements of your income & expenditure, financial information about your business, copies of your credit reports etc

#### Why we need it

We need to know your basic personal data in order to obtain an offer of finance on your behalf from lenders. We will not collect any personal data from you we do not need in order to provide and oversee this service to you.

Automated Decision Making: Our panel of lenders may use automated decision-making in respect of your application for finance. We will only collect the minimum amount of data needed and have a clear retention policy for the profiles we create.

You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or any significant effects. You can request human intervention and challenge a decision made this way by contacting us at <a href="mailto:karlmallett@cfbuk.org">karlmallett@cfbuk.org</a>

Processing is lawful under GDPR because we have asked you to take specific steps before entering into a contract.

#### What we do with it

All the personal data we use is controlled by Harper Financial Commercial Solutions and Commercial Finance Brokers UK Limited in the UK. However, for the purposes of IT hosting and maintenance, this information may be located on servers within the European Union. 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 at <a href="https://www.cfbuk.org">www.cfbuk.org</a>

We may pass your data to UK based lenders in order to provide you with offers of loans and mortgages suitable to meet your requirements.

Your data is stored electronically on our encrypted server which is at Commercial Finance Brokers UK Limited's offices in Woodbridge, Suffolk. This server is backed up to a Microsoft OneDrive, which is a cloud-based facility. We also keep some records in paper format. These files are stored in a locked office at our premises and will be archived to an external 3rd party archiving company once your loan has completed and drawn down. If you do not complete a loan through us we will destroy all data, we hold on you after 6 months.

#### How long we keep it

We are required to keep your data for a minimum of 6 years after which time it will be destroyed.

#### What are your rights?

If at any point you believe retained information is incorrect you can request to see this information and even have it corrected and possibly deleted. Providing you with this information is free of charge, but charges may apply for excessive requests.

If you wish to raise a complaint about how we have handled your personal data, you can contact our Data Protection Officer, Michael Harper who will investigate the matter or Commercial Finance Brokers UK Limited's DPO Karl Mallett who can be contacted through karlmallett@cfbuk.org or 0800 999 2015

Where relevant, you have the right to withdraw consent at any time and this means that we cannot process your data provided once your consent has been withdrawn.

If you are not satisfied with our response or believe we are processing your personal data not in accordance with the law, you can complain to the Information Commissioner's Office (ICO).

We will share your details with those banks and other lenders who might be interested in lending money to you, so that they can process your information, allowing Harper Financial Commercial Solutions / Commercial Finance Brokers UK Limited to offer suitable and sustainable products that they provide. If you consent to us passing your details for that purpose sign to confirm.

Signed	Print Name	Dated