

At FCG Finance Ltd, we're committed to keeping your information private and secure. FCG Finance Ltd will attempt to ensure that the use of your Personal Information is compliant with the General Data Protection Regulation, ("GDPR"), (*Regulation (EU) 2016/679*). This notice sets out the personal data we collect and what we will do with it.

If you have any questions about this policy, you can email us at [info@invoicecycle.com](mailto:info@invoicecycle.com) or call us on 0203 734 8463. You can also write to us at FCG Finance LTD, Complaints Team, International House, 24 Holborn Viaduct, City of London EC1A 2BN.

## The Data that We Collect

We will collect personal data on anyone who submits an application to FCG Finance Ltd, any additional directors or shareholders of a limited company, any partners of a limited liability partnership and any loan guarantors in accordance with the GDPR.

We may collect and process the following personal data about you:

- Your name, date of birth, residential address, email address and phone number
- If you take funding from us, your account information such as transaction and repayment history
- Where you are a sole trader, additional information that helps us to understand your personal ability to afford repayments (such as income and expenditure and number of dependents)
- Documentary evidence confirming your identity and address (such as a passport, driving license or council tax bill)
- Records of communications (e.g., call recordings, emails and chat transcripts)
- Technical information about your device and website usage (please see our Cookie Policy below for more details)
- Information about your personal finances (including bank statements and property ownership)
- Other information that you provide to us voluntarily
- Employment & education data including employment history, references and education.

This information may have been collected via a number of different ways including:

- Directly from you through your online account or may have been submitted by someone else, such as another director of the company or a broker.
- From third parties or publicly available sources including:
  - Credit reference and fraud prevention agencies,
  - Companies House
  - the Land Registry
  - Accounting software and data providers who have access to your financial data via the Open Banking initiatives.
  - Analytics providers such as Google based outside the EEA

- Recruitment agencies or previous employers.
- Our website uses cookies to distinguish you from other users of our website and improve the performance of the website for you.

Please see the section on data sharing below for more detail.

## What We will do with your Data

Before we provide services, goods or financing to you, we undertake checks for the purposes of preventing fraud and money laundering, and to verify your identity. These checks require us to process personal data about you.

We process your personal data on the basis that we have a legitimate interest in preventing fraud and money laundering, in order to protect our business and to comply with laws. Such processing is also a contractual requirement of the services or financing you have requested.

Below is a list of the other ways in which we may use your personal data, the reasons we rely on to do so and what our legitimate interests are

Processing Activity	Reasons	Our Legitimate Interests
Where you are a sole trader or a guarantor, conducting personal	To fulfill our contract with you	Assessing you/your business' eligibility for credit
Setting up, administering and managing our customers' accounts	To comply with our legal obligations For our legitimate interests	Effectively managing our relationship with you and your business
Conducting risk modelling and analysis	For our legitimate interests	Continuously improving the services that we provide to you and other customers
Marketing our products and services to you (which you can choose to opt-out from)		Working out which of our products and services may interest you and telling you about them

In some instances, we may use your data in ways that are not described above. However, we will inform you before doing so.

## Data Sharing

We may share your personal information with third parties in the following circumstances and in accordance with the GDPR:

- We may report to credit reference and fraud agencies as described below
- In accordance with our legal obligations, we may permit law enforcement agencies to access and use your personal data to detect, investigate and prevent crime
- We may use the following third-party processors to assist us in providing services to you:
  - Providers of software platforms which enable us to provide services to you and your business (such services will include email, data analytics, hosting, payment processors and data storage)
  - Providers of telecommunications and postal mail services
  - Social media sites, for the purposes of conducting market research and running marketing campaigns (it is important to note that when sharing data with these sites, we ensure that your data is only used in accordance with our instructions)
- If your details were originally passed to FCG Finance Ltd via a third party (such as a referral platform or financial broker) we may report your application outcome and loan status back to that platform; and
- We may instruct third parties to act on our behalf in order to collect an outstanding debt.
- Other entities within the FCG Finance group that may be located within the EEA or outside of the EEA.
- If your facility is under a scheme provided by the British Business Bank, we will share information with them in order to allow us to issue the facility. This includes but is not limited to professional advisers, consultants and auditors carrying out due diligence.
- Our professional advisers including our lawyers, auditors, accountants and consultants.
- Any person or persons seeking to acquire all or part of our business and/or assets and any potential assignees of your credit agreement, along with their third-party advisers;

### Credit Reference Agencies

In order to process your application, we will perform credit and identity checks on you with one or more credit reference agencies (such as Creditsafe and Experian). We may also make periodic searches at credit reference agencies to manage your account with us.

To do this, we will supply your name, date of birth and address history to the credit reference agencies and they will give us information about you. Credit reference

agencies will supply to us both public (including electoral register) and shared credit, financial situation, financial history, 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 us
- Prevent criminal activity, fraud and money laundering
- Manage your account(s), including conducting ongoing credit checks to ensure that you or your business remains eligible for the agreed credit facility
- Trace and recover debts

In utilising the data held with credit reference agencies, we must abide by the Principles of Reciprocity by contributing the same level of credit performance data that we receive. As such, we may continue to exchange information about your repayment history with credit reference agencies while you have a relationship with us. We may also inform the credit reference agencies about your settled accounts. If you borrow and do not repay in full and on time, credit reference agencies will record the outstanding debt. This information may be provided to other organisations than run a credit check on you with the credit reference agencies, such as other finance providers.

When credit reference agencies receive a search from us, they will place a search footprint on your credit file that may be seen by other lenders.

The identities of the credit reference agencies, their role also as fraud prevention agencies, the data they hold, the ways in which they use and share information, data retention periods and your data protection rights with the credit reference agencies are explained in the Credit Reference Agency Information Notice ("CRAIN"). The CRAIN is accessible from all credit reference agencies. For your convenience we have supplied a link to the CRAIN notice for Experian below:

<https://www.experian.co.uk/legal/crain/>

## **Identity, Fraud and Money Laundering**

We run external fraud checks which involve sharing some of your personal data with third party fraud prevention agencies.

These agencies can hold your personal data for different periods of time, and if you are considered to pose a fraud or money laundering risk, your data can be held for up to six years. A record of any fraud or money laundering risk will be retained by the fraud prevention agencies, and may result in others refusing to provide services, financing or employment to you.

## **Automated Decisions**

We may also automatically decide whether or not to lend to you or your business, how much to lend, at what interest rate and under what terms.

You have rights in relation to automated decision making, such as the right to request human intervention or challenge a decision in certain circumstances. If you want to know more, please contact us using the contact details above.

## Retention

The period for which we may retain data about you will depend on the purposes for which the data was collected, whether you have requested deletion of the data, and whether we have any legal obligation to retain the data (for example, for regulatory

compliance). We will not retain data about you for longer than is necessary to fulfil the purposes for which the data was collected. For example, we will typically keep your data for up to 10 years after you last had an active account or product with us, or after you made or started an application. We may keep your personal data for a longer period where it is necessary for legal, regulatory or operational purposes.

## Protecting Your Data

We implement, and regularly review, technical and organisational measures designed to protect personal data that we process from unauthorised disclosure, use, alteration or destruction.

## Your Rights

Your personal data is protected by legal rights, which include your right to:

- Object to, or request a restriction of, our processing of your personal data (for example, you can request that we don't use your personal data for purposes of direct marketing)
- Request that your personal data is erased or corrected
- Request access to your personal data
- Obtain and reuse certain personal data for your own purposes

For more information or to exercise your data protection rights, please contact us using the contact details above.

You also have a right to complain to the Information Commissioner's Office, which is the UK regulator which upholds rights in relation to individual's personal data.

## Cookie Policy

This website uses tiny files called cookies to monitor browsing preferences (among other

reasons). You may at any time choose to disable cookies via your browser but in doing so you accept that this Site may not function fully as a result.

## Changes to this Notice

We may update this notice (and any supplemental privacy notice), from time to time. We will notify of the changes where required by law to do so.

Last updated: February 2022