

Privacy Policy

We take your privacy very seriously & understand you will wish to know how we will use the information we collect from or about you, how secure it is & what rights you have relating to it.

In this privacy policy we explain :

- 1. Who we are & how to contact us**
- 2. What personal data is collected about you & where we get it from**
- 3. Why we collect your personal data & what we use it for**
- 4. Our purpose & legal grounds for collecting, processing & storing your personal data**
- 5. Who we share your personal data with & why**
- 6. Where your personal data is stored & processed**
- 7. How long your personal data is kept**
- 8. Your rights to your personal data**
- 9. Marketing of products & services**

1. Who we are

We are Bentley Associates (Philip Bentley t/a), a firm of commercial finance brokers, authorised & regulated by the Financial Conduct Authority, FRN 723324. You can contact us at : Arden Grange, Springfield Avenue, Harrogate, HG1 2HR. Tel no. 01423 522571, e-mail : phil@bentleyassociates.net. Our data protection officer is Philip Bentley.

2. What personal data is collected about you & where we get it from

We may collect & process the following information about you :

1. Information you provide directly to us or via a third party (e.g. accountant, solicitor, business adviser, etc), by applying for our products & services whether in writing, by e-mail, over the telephone or via other means. This information may include your name, address, contact details, date of birth, bank details, home ownership details, reason for borrowing, proof of identity documentation, details about your employment or business, and financial information
2. Records of any correspondence from you or anyone acting on your behalf
3. Details of transactions you carry out with us
4. Publicly available information : e.g. from land registry, companies house, the electoral register, other information available online or in the media

Please note you must not send us personal information about someone else without first getting their consent for it to be used & disclosed in the ways set out in this privacy notice. This is because we will assume they have given their consent, although we may still ask for confirmation from them.

3. Why we collect your personal data & what we use it for

We may collect, process, transfer & disclose your information for the following purposes :

1. To negotiate credit facilities on your behalf with lending institutions where you apply for credit
2. To provide you with quotations, products & services, manage your accounts & comply with your instructions
3. To verify your identity
4. To enable searches and credit checks to be carried out by a lender where your consent is given

Where you apply for credit we will tell you, where permitted by law, if a decision is made about you relating to your credit scoring or eligibility for financial or other products based solely on an automated decision making process. You can then request a review using other means.

We only collect, store & process the minimum amount of personal data that is necessary to arrange products & services on your behalf and to comply with our legal & regulatory obligations arising from these arrangements. We will not disclose your personal information to parties outside of these arrangements.

4. Our purpose & legal grounds for collecting, processing & storing your personal data

We consider we have the following legal bases for using your personal data :

1. Performance of contract with you – we need to use your personal data to be able to successfully legally contract with you
2. Compliance with our legal obligations – laws & regulations including financial crime legislation
3. Legitimate interests – our business & commercial reasons which we balance against your interests. We have certain legitimate interests in using your data which are not outweighed by your interests, fundamental rights or freedoms. These legitimate interests are to help detect & prevent financial crime, fraud & money laundering & to promote responsible lending, at the same time as complying with the legal & regulatory requirements placed on us
4. Your consent – we may also use your data when you consent to it. You can withdraw this consent at any time, in which case we cease to use it, unless we have a right & a need to continue processing it for one of the reasons outlined above

5. Who we share your personal data with & why

We share your data for the most part with major banks & lending institutions, for the purpose of arranging credit facilities on your behalf.

Where you express interest in or apply to us for a general insurance product we may pass your details to an insurer.

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

We never sell any of your information to third parties. Neither do we give anyone your information so they can market to you without your prior consent.

6. Where your personal data is stored & processed

All the personal data we use is held securely in either or both paper & electronic format & controlled by Bentley Associates at our business premises in Harrogate. For the purposes of IT hosting & maintenance electronic data is also located on servers within the European Union. Our server is based in the Netherlands.

7. How long your personal data is kept

We will retain your personal data for the duration of any agreements you have via ourselves and or as long as you are a customer with us. We may retain your personal data beyond this date & will in any event retain your personal data for the minimum period required by law. In the case of live & settled accounts this is 6 years from the date of expiration or settlement of those accounts.

We may also retain your data to deal with any disputes, to maintain records & to show we have dealt with you fairly.

8. Your rights to your personal data

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

1. object to our controlling & processing your personal data
2. object to our sharing your personal data with others or certain organisations
3. request that your personal data is erased or corrected or that its processing be restricted
4. request access to your personal data & for it to be given to you in a portable format

- 5. request that we transfer your personal data to another lender
- 6. request that we confirm what personal data we currently control &/or process in relation to you

Where relevant you have the right to withdraw consent at any time & this means that we cannot process your data without your consent.

If you are unhappy about how your personal data has been used by us, please contact us & we will investigate the matter & provide you with details of our Complaints Procedure.

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). You can contact them at : ICO, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, tel. 0303 123 1113.

9. Marketing of products & services

We would like to stay in touch with you & from time to time provide you with details of financial products & services we feel will be of interest or value to you. Please sign below to acknowledge you are happy for us to do so.

You can withdraw your consent and opt out of receiving any marketing information from us at any time by e-mailing us at phil@bentleyassociates.net or calling us on 01423 522571.

Signed

Name

Position

Company

Dated

