

Who are we?

Phoenix Operations Ltd are committed to protecting and respecting your privacy. Phoenix Funding is a registered UK Ltd Company – Co. No. 15598478 and our registered address is 601 London Road, Southend on Sea, SS0 5PE. Any reference to 'us', 'our' or 'we' in this Privacy Policy is a reference to Phoenix Operations Ltd. Similarly, any reference to 'you', 'your', 'yours' or 'yourself' in this Privacy Policy is a reference to any of our past, prospective or current membership, employee, government, agency, partner, media or other public or industry contacts. Collectively known as "data subjects".

We are committed to developing close working partnerships with our borrowers and are committed to supporting them at each stage.

This Privacy Policy (Notice) describes your rights, the information or "Personal Data" we would usually collect and use and how we would protect it.

Our commitment & obligations to you:

We take the collection, usage and security of your personal data seriously. We can only use your personal data under law if we have a good reason for doing so. The law provides examples of those reasons. These include:

- To perform or fulfil an agreement we have with you;
- If we have a legal duty;
- If it is within our legitimate business interest;
- If there is a public interest reason for doing so; or
- If you have given your consent.
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- If we have a legal duty;
- If it is within our legitimate business interest;
- If there is a public interest reason for doing so; or
- If you have given your consent.

A legitimate interest is when we have a business or commercial reason to use your information. But even then, it must not unfairly go against what is right and best for you. If we rely on our legitimate interest, we will tell you what that is.

- Your personal information (for example, your name and date of birth)
- Contact details (for example, your postal address, phone number, e-mail address or mobile number)
- Customer Relationship Data (for example, notes of calls or requests you may have made or attendance at an event or webinar)
- Payment Transactions Data (for example, when you make a payment)
- Financial information (for example, bank account numbers)
- Online profile and social media information
- Communications data
- Technical Information including internet protocol (IP) address, your login data, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform.
- Location data
- User login and Subscription Data
- Economic Crime related information (e.g. Financial Crime and Fraud Information)
- Investigations data
- Education and employment information
- Visual images and personal appearance (such as copies of passports or CCTV images)

- Information about your family, lifestyle and social circumstances (such as dependents, marital status, next of kin and contact details)

On occasion the following special category (sensitive) personal data may be obtained: physical or mental health details, political opinion, racial or ethnic origin and religious beliefs. We will only obtain and process this information with your consent (permission) or in situations where it is in the wider public interest.

If you choose to provide us with any Personal Data relating to a third party (for example, information relating to your spouse, children, parents, and/or employees) or ask us to share their personal data with third parties, by submitting such information to us, you confirm that they understand the information in this notice about how we will use their personal data.

How is the personal data obtained?

We obtain this information in several ways, for example through your use of our services or other dealings with us including through the member onboarding process, enquiry forms, and from information provided in the course of ongoing correspondence. We may collect personal data from you:

- When filling in forms, (the contact form on our website) or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you subscribe to our services, complete a survey, sign up to a newsletter, report a problem with our site, request further services.

With regard to each of your visits to our site we may collect the following information:

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and
- information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), cookies and methods used to browse away the page.

We may collect data about you when you attend any of our events, training sessions and/or attendance of Phoenix Funding working groups / committees. This may be collected via business card information you have provided to a Phoenix Funding employee or where you have been invited, nominated or otherwise requested to attend one of our events, training sessions and/or working groups / committees. This information may include your name, job title, company, business or personal email address, phone numbers (business or personal).

Information received from other sources.

- We may receive information from other sources, such as from our members, associate members, government officials, law enforcement and fraud prevention agencies, regulatory bodies, our other partners for the purpose of providing services to our members. This includes supporting members and law enforcement and fraud prevention agencies to combat, prevent and detect economic criminal activity. The information received may include names, address, bank account details, transaction information, criminal convictions and cautions and indications of potential or actual criminal activity.

- Offers and promotions to you via our site, any other websites we operate or other services we provide, advertising networks and analytics providers or publicly accessible data.

What do we use your personal information for?

- To carry out our obligations arising from any agreements entered into between you and us and to provide you with the information, products and services that you request from us.

As a business, it is critical that we perform our agreement with you with the best service possible, and it is in our legitimate interest to be responsive to you and to ensure the proper functioning of our products and organisation.

Cookies

We may obtain information about your general internet usage by using cookie files stored on your computer or device ("cookies"). Cookies are text files containing small amounts of information which are downloaded to your computer or device when you visit a website. They help us to improve our site and to deliver a better and more personalised service.

You can find more information about cookies and how to manage them at <http://www.allaboutcookies.org/>. You may disable cookies by changing the settings on your browser. However, if you do so, this will affect your enjoyment of our site and we will no longer be able to offer to you a personalised service. Unless you opt out of cookies in your browser settings, we will assume you consent to the use of cookies.

How we share your personal data

We take your privacy very seriously and we'll only share your information where:

- we need to for the purposes of providing you with products or services you have requested.
- we have a public or legal duty to do so e.g. to assist with detecting fraud and tax evasion, economic crime prevention, regulatory reporting, litigation or defending legal rights;
- we have a legitimate reason for doing so e.g. to manage risk, to assess your suitability for services, or to enable one of our virtual activity sponsors to promote themselves to you; or
- we have asked you for your permission to share it, and you've agreed.

Third parties

We may occasionally share your data with trusted third parties to help us deliver efficient and quality services. We will never sell, trade, or rent your Personal Data to others; however, we may share your information with selected third parties including:

- business partners, suppliers and subcontractors for the performance of any contract we enter into with them or you;
- financial institutions in performance of our role to support with economic crime information sharing initiatives; providing services for our members or where we are otherwise directed by you to share information with them;
- 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;

- provided you have consented; marketing, market research, advertisers and advertising networks that require the data to select and serve relevant adverts to you and others;
- analytics and search engine providers that assist us in the improvement and optimisation of the website;
- any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries for the purposes set out above;

Economic Crime Information Sharing

We may share your personal data with law enforcement agencies, fraud prevention agencies, public authorities or other organisations if legally required to do so, or if we have a public interest and/or good faith belief that such use is reasonably necessary to:

- comply with a legal obligation, process or request (including responding to any requests from law enforcement authorities outside the EEA, as defined below);
- enforce our agreements, including investigation of any potential violation thereof;
- detect, prevent or otherwise address economic criminal activity (including financial crime, fraud, money laundering etc);
- detect, prevent or otherwise address security, fraud or technical issues with our services and site; or
- protect the rights, property or safety of us, our users, a third party or the public as required or permitted by law.

Sharing Aggregated/Anonymised Data:

Where we have made your information anonymous, we may share this outside of Phoenix Funding with partners such as research groups, universities, advertisers or connected sites. For example, we may share information publicly to show trends about the financial services market.

Links to external websites

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies or how such websites collect and use your data. Please check these policies before you submit any personal data to these websites.

Where we store or transfer your personal data

We would usually ensure that the majority of personal data we store or process is within the UK or European Economic Area (EEA).

There may be situations where the data that we collect from you may be transferred to, and stored at, a destination outside the UK and EEA”, including, in particular, the United States. It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers or business partners. We will ensure they agree to apply equivalent levels of protection for personal data. If this is not possible – for example because we are required by law to disclose information – we will ensure the sharing of that information is lawful. Also, if they are not in a jurisdiction that is regarded as having “adequate” levels of protections for personal data, we will put in place appropriate safeguards (such as contractual commitments), in accordance with applicable legal requirements, to ensure that your data is adequately protected.

Security of your personal data

We always take appropriate technical and organisational measures to ensure that your information is secure. In particular, we train our employees who handle personal data to respect the

confidentiality of customer information and the privacy of individuals. We regard breaches of your privacy very seriously and will impose appropriate penalties, including dismissal where necessary. We have appointed a Compliance Officer to ensure that our management of personal data is in accordance with this Privacy Notice and the applicable legislation. The transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of the data transmitted to our site; any transmission of your data is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

How Long We Keep Your Information

We will retain your personal information for as long as you use our services and for a reasonable time thereafter. After you have terminated your use of our services, we will retain your personal information for up to seven years and thereafter may store it in an aggregated and anonymised format.

Your rights

Data protection laws give you certain rights in relation to the data we hold on you. These include the following rights to:

- request a copy of the personal data we hold about you;
- request that we supply you (or a nominated third party) with a copy of the personal data that you provided to us;
- inform us of a correction to your personal data
- exercise your right to restrict our use of your personal data
- exercise your right to erase your personal data; or
- object to the ways in which we are using your personal data.

Your ability to exercise these rights will depend on a number of factors and in some instances, we will not be able to comply with your request e.g. because we have legitimate grounds for not doing so or where the right doesn't apply to the particular data we hold on you.

Where you have provided consent to our use of your data, you also have the unrestricted right to withdraw that consent at any time. Withdrawing your consent means that we will stop processing the data that you had previously given us consent to use. There will be no consequences for withdrawing your consent.

If you would like more information on these rights, please contact us using the details below.

How to contact us

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to Clint@phoenixfunding.co.uk

What if I have a complaint?

If you have a concern about any aspect of our privacy practices, you can make a complaint. This will be acted upon promptly. To make a complaint, please contact us via one of the methods set out above. If you are not satisfied with our response to your complaint, you have the right to lodge a complaint with our supervisory authority, the Information Commissioner's Office (ICO). You can find details about how to do this on the ICO website at <https://ico.org.uk/concerns/> or by calling their helpline on 0303 123 1113.

Changes to our Privacy Policy/Notice

Any changes we may make to the Privacy Notice in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check this page frequently to see any updates or changes to this Privacy Notice.