

Privacy Policy

We ask that you read this privacy notice carefully as it contains important information regarding your personal data. The Privacy Notice describes the categories of personal data we will process and the purposes for processing. Shire ensure that the collection and usage of your personal data is done in accordance with the General Data Protection Regulation (GDPR) and its requirements.

This Privacy Notice will come into effect on 25th May 2018.

1. Introduction

1.1 Shire Invoice Finance Limited (“Shire”) takes your privacy seriously, in this Privacy Notice you can find out more information about your privacy rights and how Shire gather, use and share your personal information. This will include personal information we collect directly from you, a third party or information we already hold about you.

1.2 Shire’s Data Protection Officer (“DPO”) can answer any queries you might have regarding your personal data or if you wish to exercise any of the rights mentioned within this Privacy Notice. Please contact our DPO by email at info@shireinvoicefinance.co.uk, by telephone at 01827 300310 or by post at 1 Calico Business Park, Sandy Way, Amington, Tamworth, Staffordshire, B77 4BF.

For more information about your rights please see Section 10.

1.3 This Privacy Notice contains up to date information about how Shire uses your personal data, this notice will update any previous information about how we process and use your personal data. Shire will update this notice if we make significant changes in how we use your personal data, if we do make changes to this policy you will be notified via our website.

2. About Shire

2.1 When Shire Invoice Finance Limited collect and use personal data about you we become responsible for this data. When we do this we are regulated by the GDPR. Under this regulation Shire is known as a ‘data controller’ of that personal data.

2.2 By personal data, we mean information which can be used to identify you. For the purposes of this privacy notice, where we refer to “You” or “your” we are referring to individuals whose data we process, this includes business owners and any key personnel from the party making the application or entering into an agreement.

3. How we collect personal data

3.1 Shire will obtain personal data:

- Directly from yourself, from e.g. order form/application documents;
- Through the course of an agreement either directly from you, your association or with a business supplier/brokers who introduce you to us;
- From third party organisations such as credit reference and fraud prevention agencies.

Shire may also obtain personal data from either monitoring or recording calls. We will record and monitor telephone calls for training, auditing, resolving queries and issues and to improve overall quality and service delivery. When we process your personal data this will be either to comply with a legal obligation, to perform a contract or for our own legitimate business interest as set out in Section 6.

More information on what kind of information we collect.

3.2 In the course of dealing with your application and any subsequent agreements you enter into we may collect the following personal data:

- Your title, full name, contact details, email address, home and mobile telephone numbers;
- Your home address and address history, together with information about your occupier status, whether you are a tenant, live with parents or are an owner occupier;
- Your date of birth;
- Your occupation, job title and employment details;
- Your personal identification i.e. a passport or a driving license;
- Your nationality if this is necessary for us to comply with our legal and regulatory requirements;
- Your bank details;
- Your solvency and/or litigation history;
- Personal data obtained from third parties such as credit reference or fraud prevention agencies and publicly available sources of information such as the electoral roll and court records of debt judgements and bankruptcies;

Those making an application should not share any other individual's personal information with us except where they have shown them a copy of this privacy notice and obtained their confirmation that they know you will share it with us for the purposes described.

Depending on how you make your application we may collect this information directly or indirectly.

4. How we use your personal data

4.1 In order for Shire to provide you with any products or services we will need to process your name, address and date of birth. In certain circumstances we may be required to obtain additional personal data about you.

4.2 To consider an application and processing, we will use:

Your contacts details, these include; your name, address, email address, telephone number and date of birth.

We process and use this personal data to comply with legal obligation, to perform a contract and for our own legitimate business interest.

4.3 To make a credit decision about you we will use:

- Information you provide to us directly,
- Information we receive from third party credit reference and fraud agencies,
- Information we obtained through the course of an agreement or previous agreements, and
- Information we receive from third parties.

For this purpose of processing Shire will share your personal data with credit reference and fraud prevention agencies. The information could be used for:

- Credit Reference Agencies (CRA's) will add a search footprint onto your credit file when we have conducted a credit search, this may be seen by other lenders.
- If you are making a joint application, or tell us you have a spouse or financial associate Shire and the CRA's or fraud prevention agencies (FPA's) may link your records together. This means that each other's personal data (including information the CRA or FPA already holds) will be taken into account with all future credit applications by either or both of you. 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. Therefore you should make sure you discuss this with them and share this Privacy Policy, before lodging an application.
- We might add to your CRA or FPA records about details of your agreements, this may include any defaults or failure to keep to the terms of your agreement and when a payment is overdue.
- CRA's or FPA's could pass this personal data onto other companies who have no relation to us who conduct either credit or fraud prevention checks.

We process and use this personal data in order to comply with our legal obligations and for our own legitimate business interest.

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

<http://www.experian.co.uk/crain/index.html> CRAIN is also accessible from each of the three CRAs – clicking on any of these three links will also take you to the same CRAIN document:

Callcredit <https://www.callcredit.co.uk/crain>;

Equifax <https://www.equifax.co.uk/crain.html>; Experian

<http://www.experian.co.uk/crain/index.html>.

Download a list of the CRA's and FPA's Shire uses.

4.4 Where we share information with a Funder, we will use:

Your contacts details, these include; your name, address, email address, telephone number and date of birth.

In considering your application we or our funders to whom we may assign or broker our agreement may conduct CRA or FPA checks. More information in regards to CRA's and FPA's are listed in Section 4.3.

We process and use this personal data to comply with our legal obligations and for our own legitimate business interest.

4.5 To fulfil or comply with our legal obligations, to prevent financial crime, including fraud and money laundering we will use:

- Information you provide us directly, and
- Information we receive from third party CRA's and FPA's

This personal data will only be used where it is necessary for us to comply with a legal obligation or for our own legitimate business interest. The personal data will include, name address, date of birth and nationality.

We will provide personal data to and receive personal data from third parties such as CRA's and FRA's where it is necessary to meet our legal obligations. This may also include the police and other law enforcement and government agencies.

4.6 To administer payments we will use:

Your contact details and the payment details that you have provided to us. We may provide your data to a third party payment provider to process the payment.

We process and use this personal data for our own legitimate business interest.

4.7 To operate and administer our products and services, including dealing with your complaints and fixing our mistakes, we will use:

Your contacts details, these include; your name, address and date of birth.

We may share your data we use for this purpose with third parties who help us verify your contact details.

We process and use this personal data to comply with legal obligation, to perform a contract and for our own legitimate business interest.

4.8 To comply with our legal obligation, to support our vulnerable customers:

Data you give us that identifies a vulnerability, such as a health condition.

We will give information to and receive information about a vulnerability from third parties where it is necessary to meet our legal obligations, for example from the police or someone acting on your behalf.

4.9 For debt recovery purposes, we will use:

Your contact details, these will include your name, address and date of birth.

Shire will give your personal data to and receive information from third parties where it is necessary to recover debts due by you to us, Third parties may include, debt recovery agents, CRA's, Courts, or bailiff services.

4.10 To carry out audit, good governance and analysis to develop and improve our products and services, we will use:

Your contact details, these will include your name, address and date of birth.

We process and use this personal data to comply with legal obligation contract and for our own legitimate business interest.

4.11 To market products and services to you, we will use:

We will market directly to you or where your employer has taken out a product using the contact details either you or them have provided to us unless you have opted out.

We process and use this information for our own legitimate business interest. You have the right to object to Shire's direct marketing at any time.

4.12 To record telephone calls:

Shire may also obtain personal data from either monitoring or recording calls. We will record and monitor telephone calls for training, auditing, resolving queries and issues and to improve overall quality and service delivery. When we process your personal data this will be either to comply with a legal obligation, to perform a contract or for our own legitimate business interest as set out in Section 6.

5. Automated decision making

5.1 Sometimes we use your personal information in automated processes to make decisions about you, such as credit scoring. We might also use automated processes to create a profile of you. We do this to help ensure decisions are made accurately, fairly and efficiently. Decisions Shire makes solely on automation do not result in a rejected decision.

More information about automated decision making.

Credit Scoring

Where you are a sole trader or a partner in a partnership Shire will use automated decision making using your personal data to conduct credit scoring – this evaluates your financial profile.

In order to undertake credit scoring we use the data you have provided to us and data we obtain from CRA's.

We use credit scoring to make decisions about you such as whether we will enter into an agreement to provide a product or service to you.

To find out information about your rights in relation to automated decision making please see details found in Section 10.

6. Our legal basis for processing your personal data

6.1 Shire will only use your personal data where it is permitted by law that protects your privacy rights. When you apply for finance or enter into a finance/trading agreement with us we will use your personal information where:

- It is fair to use the personal data either in our interests or someone else's interests, where there is no disadvantage to you – we refer to this as legitimate business interest,
- We need to use the data to perform a contract with you,
- We need to use the data to comply with our legal obligations; and
- We have your consent (if consent is needed).

Where we have your consent, you have the right to withdraw this. Shire will let you know how you can do this at the time we gather your consent.

7. Sharing your personal data

7.1 Who we share your personal data with is dependent on the products or services we provide to you. For the majority of our products and services we will share your personal data with our funders, brokers, suppliers, CRA's and FPA's. For more information on how we use your personal data please see Section 4.

7.2 The personal data we have about you usually is gathered from you direct or through the course of an agreement, from public domain or third parties. In some circumstances we will transfer and obtain personal data from third parties where it is necessary for purposes such as credit checking and fraud prevention or for marketing purposes.

For more information on who we share data with please download a list of the third parties we share your personal data with [here](#).

8. Keeping your personal data secure

8.1 Shire have adopted appropriate security measures to ensure your personal data remains secure. This prevents your personal data from being accidentally lost, used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

8.2 We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

9. Transferring data outside of the European Economic Area

9.1 In providing our products and services to you we may transfer your personal data outside the European Economic Area ('EEA'). Any transfer of your personal information will be in accordance with our legal obligations to ensure the safeguarding of your personal information during such transfer. If you would like more information or the details of the safeguards we have in place to protect your personal information please contact our DPO using the details set out in Section 1.

10. Your rights

10.1 Under the GDPR you have a number of rights in terms of how we use your personal data. You have the right to object how we use your personal data. You also have the right to access the personal data we hold about you. You can also ask us to delete, restrict or correct any inaccuracies in your data in addition to requesting some of your information is provided to a Third Party.

More information about your Privacy Rights.

10.2 Right to Object

You have the right to object how we use your personal data. This means you may object at any time to processing of personal data for direct marketing and decisions being made by automated means in addition to data being processed in certain other situations. If you would like to make an objection please contact our DPO with the reasons for your objection.

10.3 Right of Access

This allows you access to your personal data and to certain other supplementary information that this Privacy Notice is already designed to address. You can request access to a copy of your personal data that we hold in addition to why we use it, how long we keep it for, who we share it with and whether it has been used for any automated decision making. This will be provided to you in a hard copy or a commonly used, machine-readable format.

10.4 Right to Rectification

This gives you the right to request Shire to change or complete any incorrect or partial information we hold about you.

10.5 Right to Erasure

This gives you the right to erase personal data that we hold about you where it is no longer necessary for us to use or keep the data, you have withdrawn consent or if we have no legal basis to keep the data.

10.6 Right to Portability

This gives you the right to transmit some of the personal data we hold about you to a third party. The data can either be provided to you in a commonly used, machine-readable format or can be provided to the third party direct. This only applies to personal data you have given us direct, if it is for the performance of a contract, based on consent or when processing is done by automated means.

10.7 Right to Restriction

You have the right to restrict how we process your personal data in circumstances where you have exercised your right to object, rectification or erasure.

If you would like to exercise any of your rights listed above, please contact our DPO using the details listed in Section 1. Please provide us with the following:

- Enough information to identify you, including proof of identity and address (passport, driving licence and a utility bill),
- Any information that your request relates to, including any account or reference numbers.

For further information on each of your rights, including the circumstances in which they apply, please see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individual's rights under the General Data Protection Regulation](#).

If you would like to exercise any of these rights please contact our DPO at the address listed in Section 1.

11. Personal data retention

11.1 The length of time we keep your personal data for is dependent on how the data is used and recorded. Shire will never retain your personal data for longer than necessary for the purposes we require it for. Generally this will be up to seven years after the end of the agreement or application in order to comply with our legal obligations.

If you would like more information about how long we keep your data please contact our DPO using the details listed in Section 1.

12. Your online activities

12.1 Shire uses cookies to track your use of our website:

www.shireinvoicefinance.co.uk

More information about cookies

A cookie is a small file which is sent to your browser and stored on your computer's hard disc and enables us to track and understand your usage of our website and where we can make improvements to the information and services we provide to you. We use cookies solely to gather information on IP addresses, administer the website and track your movements on the website. For more information about blocking the use of cookies, please refer to the guidance on your internet browser.

Please note you may not be able to use or access certain areas of our website if you block all cookie usage.

13. How to make a complaint

13.1 If you are unhappy with how we process and use your personal data you can make a complaint directly to us, you can do this by contacting our DPO with the details listed in Section 1.

13.2 We hope that we can resolve any query or concern you raise with us directly, however if we are unable to do so the GDPR also gives you right to lodge a complaint with a supervisory authority. The supervisory authority in the UK is the Information Commissioner's Office ("ICO") who may be contacted at <https://ico.org.uk/concerns/>.

Appendices

Appendix 1 List of our Credit Reference and Fraud Prevention agencies.

Supplier	Service
Experian Limited	Credit Referencing
Creditsafe Business Solutions Limited	Credit Referencing
Dun & Bradstreet Limited	Credit Referencing
Dow Jones & Company Inc.	Fraud Prevention

Appendix 2

List of all our Funders.

Funders
Aldermore Bank Ltd
Apollo Business Finance Ltd
Bibby Factors Slough Ltd
Bibby Financial Services Limited
Castlebridge SPV Ltd
Creative Capital Ltd
Creative Trade Finance Ltd
Close Brothers Group Plc.
Ecapital Commercial Finance (North) Ltd
GapCap Ltd
Hitachi Capital (UK) Plc
Investec Capital Solutions Ltd
Keen Thinking Ltd T/A Symplicity
Lloyds Bank Commercial Finance Ltd
MarketFinance Ltd
Metro Bank PLC

Mitsubishi HC Capital UK PLC
Nucleus Commercial Finance Ltd
Optimum SME Finance Ltd
Paragon Business Finance Ltd
Penny Freedom Ltd
Positive Cashflow Finance Ltd
Praetura Invoice Finance Ltd
Pulse Cashflow Finance Ltd
Regency Factors Ltd
Reward Finance Group Ltd
RBS Invoice Finance Ltd
Satago Financial Solutions Ltd
SAF Leasing Ltd
Shire Leasing PLC
Shire Securities Ltd
Siemens Financial Services Ltd
Skipton Business Finance Ltd
SME Invoice Finance Ltd
Team Factors Ltd
The Royal Bank of Scotland PLC
Trade and Export Finance Ltd
Tradeplus 24 Ltd
Ultimate Finance Group Ltd
Velocity Bridging Ltd
Zodeq Ltd

Appendix 3

List of all our brokers

Brokers
ABC Finance Ltd
Advance Finance & Leasing Ltd
All Vehicle Contracts Ltd
Bothwick Finance Ltd

Business Advice Service Ltd
Business Expert (UK) Ltd
BusinessWise Turnaround and Growth Consultancy Ltd
Central Business Development Ltd
Contact Business Finance Ltd
Finance House Solutions Ltd
Finance Partners Ltd
Fluidly Ltd
Gables Business Finance Ltd
Gatewood Commercial Finance Ltd
Global Media Internet Service Ltd
Go-Factor Ltd
Grasp Finance Ltd
K&H Finance Solutions Ltd
Konsileo (Trading) Ltd T/AS Konsileo
Love Finance Ltd
Moorgate Finance Ltd
Muswell Rose Consulting Ltd
Nicholls & Roe Ltd
Pathfinder Invoice Finance Ltd
SAF Leasing Ltd T/AS Shire Asset Finance
Shire Leasing PLC
Shire Securities Ltd T/AS Shire Funding Solutions
Shire Recoveries Ltd
X Twenty Nine Ltd T/AS The Directors Choice