

Policy title:	Privacy Policy
Policy date:	21 June 2023
Policy number:	V1/ 2023
Purpose:	This policy describes our privacy statement and explains how we handle the personal information of our customers or users. It outlines what data is collected, how it is used, and how it is protected.

Privacy policy

INTRODUCTION

Phoenix Money Ltd are committed to protecting your privacy. When you interact with us by phone, mail, in person or online, we sometimes receive personal information about you.

Our Policy shares how we collect, use, and store your personal information and the key points are listed below, so please read it carefully.

- What this policy considers
- How we collect information about you
- What information we collect
- How we use your information
- Your consent
- Keeping your information accurate
- How we protect your personal information
- Your Rights
- Retaining your information
- Cybersecurity incident
- Changes to our Privacy Policy
- Contact Us.

WHAT THIS POLICY CONSIDERS

Our privacy policy considers various legal legislation, including.

- the Data Protection Act 1998
- the Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended by The Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011
- Directive 2009/136/EC of 25 November 2009 ("The European Union Cookie Directive")
- The General Data Protection Regulation (GDPR)

HOW WE COLLECT INFORMATION ABOUT YOU

At Phoenix Money, we may collect and store information about you whenever you interact with us. This includes when you request a quote, submit an enquiry, apply for a job, or provide us with any other personal information. We may also receive information about you from third parties for a specific purpose– but only if you've given them permission to share your information.

We take your privacy seriously and will only use your information in accordance with the terms outlined in our privacy policy.

WHAT INFORMATION WE COLLECT

When you interact with us, we may ask you to give us your name, address, email, telephone numbers, company name, job title or company address. If you ask us to provide you with a quote, we may also ask for details about the lending you require.

PHOENIX MONEY

We may collect some, or all, of this information when you visit our website, depending on how you use it.

We also monitor how people use our website so we can improve it. However, you can use our website without giving us any personal information and we won't know who you are.

If you visit our site anonymously, we may however still record information about:

- the areas of the website you visit.
- the amount of time you spend on the site.
- whether you are new to the site or have visited it before.
- how you came to our website – for example, through an email link or a search engine
- the type of computer, browser, network location and internet connection you use.

We do this by using cookies.

HOW WE USE YOUR INFORMATION

Phoenix Money processes your data for legitimate interests, contractual purposes, legal purposes, and by consent. We use your data to determine if we can offer you a loan, manage relationships with intermediaries, funders, professional advisers, contractors, and third-party providers, consider job applications, and create anonymized and aggregated usage reports of their website.

We also use your data to provide contracted services, manage loans, and communicate with you. Phoenix Money holds and processes your data for legal purposes to meet our legal obligations, identify you, meet anti-money laundering obligations, and supply information to government bodies, regulatory authorities, law enforcement agencies, and credit and fraud prevention agencies.

We may hold your personal data for marketing purposes, such as to send you promotional emails or newsletters, or to keep you informed of our products and services, provided you have given your consent. We will only use your personal data for marketing purposes if you have opted in to receive such communications. You can opt out of receiving marketing communications at any time by clicking the "unsubscribe" link at the bottom of our emails or by contacting us directly.

YOUR CONSENT

By giving us your personal information, you consent to us collecting and using that information in the ways that we describe in this privacy policy and/or that you have specifically consented to.

We take your privacy seriously and will never sell your personal data to third parties for their own marketing purposes. We will only share your personal data with third parties if we are required to do so by law, or if we need to share your data with our trusted service providers in order to provide you with the products and services you have requested.

INFORMATION VIA A THIRD-PARTY

Phoenix Money takes data privacy seriously and expects all individuals who provide information to us about other people via a broker to have an appropriate legal basis for doing so. In addition, we require that all individuals who provide such information also provide a copy of our privacy policy to the other parties involved. Please note that we store all information received from third parties in both electronic and paper-based systems and take appropriate measures to keep all information secure.

At Phoenix Money, we take our obligations to identify our clients and prevent fraud and money laundering very seriously.

To carry out these checks, we work with SmartSearch, which uses Equifax, Experian, TransUnion, Dow Jones, and Companies House to provide the broadest and deepest coverage and the most frequent updates.

SmartSearch allows us to conduct regular searches when you borrow money from us, so that we can work together to manage your account more efficiently.

Please note that SmartSearch is an independent third party and we have no control over their services. If you would like to learn more about SmartSearch and their services, please visit their website at <https://www.smartsearch.com/>.

KEEPING YOUR INFORMATION ACCURATE

At Phoenix Money, we understand the importance of keeping your personal information accurate and up to date. If any of the personal information you provided to us or via third parties changes, such as your contact details or residential address, please let us know promptly in accordance with the terms and conditions of your agreement with us. If your loan application is accepted, you will be required to provide us with any changes to your personal information under the agreement you enter into with us. Failing to do so may place you in breach of your agreement, which could result in additional fees and charges or even legal action. Please take the time to ensure that your personal information is accurate and up to date and let us know if you have any questions or concerns.

HOW WE PROTECT YOUR PERSONAL INFORMATION

At Phoenix Money, we take the security of your personal information very seriously. We use appropriate physical, electronic, and managerial measures to ensure that we keep your information secure, accurate and up to date, and that we only keep it as long as is reasonable and necessary. However, it's important to note that the transmission of information over the internet is never completely secure. While we do our best to protect personal information, we cannot guarantee the security of information transmitted to our website, so any transmission is at the user's own risk. We recommend that you take appropriate precautions to protect your personal information when using the internet, such as using a secure network and ensuring that your device's security software is up to date.

YOUR RIGHTS

At Phoenix Money, we respect your rights as an individual and are committed to protecting your personal information. You have the right to request details on the information that Phoenix Money holds about you and ask us to correct any inaccurate information we might hold under the Data Protection Act 1998.

While we may ask you for an administrative fee of £10.00, we're happy to help you access and update your personal information.

You also have the right to be forgotten, but please note that this does not mean that Phoenix Money will automatically delete all information held on you. We may still need to keep appropriate information to meet our legal obligations and for legitimate interests.

There are other rights which you may not always be able to exercise due to the basis on which we process data.

These include the right to

- restrict processing of your data,
- provide your data in a portable format.
- object to the processing of your data.

If you wish to exercise your rights or make a complaint, please don't hesitate to contact us. We're here to help and want to ensure that you're comfortable with how we're handling your personal information.

You also have the option to lodge a complaint directly with the Information Commissioner's Office. You can do this by calling them on 0303 123 1113 or visiting their website at www.ico.org.uk.

RETAINING INFORMATION

We will keep information for legal purposes and our legitimate interests.

CYBERSECURITY INCIDENT

If personal data that was stored in an identifiable way has been compromised, Phoenix Money will report any unlawful data breach to relevant parties and authorities (such as the ICO) within 72 hours of the breach.

CHANGES TO OUR PRIVACY POLICY

We take your privacy seriously and may update our privacy policy from time to time. It is important that you regularly check this page to ensure that you are aware of any updates or changes.

CONTACT US

If you have any questions or concerns about our privacy policy, please do not hesitate to contact us at

info@Phoenixmoney.co.uk

or call us on (+44) 0151 294 6302.

Or write to us at:

Data Controller
Phoenix Money
Suite 5, 42 Jamaica Street
Liverpool
L1 0AF

We are always happy to help and will respond to your queries as quickly as possible.

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