

PRIVACY NOTICE

Who is the Data Controller?

Swish (UK) Limited – [\[website\]](#) Suite 307 - Cb1 Business Centre 20 Station Road, Cambridge, Cambridgeshire, United Kingdom, CB1 2JD

We are registered with the Information Commissioner's Office with registration number ZA324089. Our registration can be viewed [here](#).

Our Head of Compliance can be contacted via the above postal address or via email at info@swishfund.co.uk

Why do we use your information?

We use your personal information for a variety of reasons related to our business activities including processing your Company's application for credit, the administration of your Company's loan agreement, to contact you and to comply with our legal and regulatory obligations. Where you provide your consent we may use it to send you electronic marketing.

What is the legal basis for this use?

In most cases our use of your information is necessary and carried out on the following legal grounds:

- for the performance of a contract with you (such as your Company's loan agreement or a personal guarantee you have provided).
- where necessary for our legitimate interests (such as the administration of our business and managing our risks, and the provision, management and improvement of our website, to make sure it is working properly); and
- where necessary in order to comply with a legal obligation (for example making reports to our regulatory authority or to law enforcement agencies).

Where our use of your data is not necessary for one of the purposes outlined above we may seek your consent to use it in a particular way, for example if we want to send you marketing information, ask you to provide feedback or you tell us about a change in circumstances relating to your health.

Where we ask for your consent you may refuse and can withdraw your consent at any time by contacting us using the details set out below.

What information about you do we use

We may collect and use the following information about you:

- information about you including your contact and personal details (including your date of birth) and information about your financial circumstances, directorships and shareholdings;
- information provided to us by the loan broker that introduced you to us;
- information about you from third party organisations, such as Credit Reference Agencies (**CRAs**), Fraud Prevention Agencies (**FPAs**) and tracing agents;
- information obtained from other public data sources which might include data from the electoral roll, public records including Companies House, county court judgments, and bankruptcy and insolvency data;
- information about your use of our website (see below for details) and call recordings when you speak to us over the telephone; and
- information you (or your third party representative(s)) provide us with or share publically.

In addition, when you visit our website, we will collect information about your visit, such as which pages you visit, how often you visit and any enquiry forms or similar interactive content you complete. We will also automatically collect the following information:

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

You can exercise control over some of this information, for example by adjusting your settings via your website browser. Please also see our cookies policy [here](#) OR in Annex 2

When might we collect and use sensitive information about you?

We always seek to responsive to our customers individual needs. Sometimes you may disclose some types of information to us which are classed as sensitive under the law. A common example of this is information about your mental or physical health. We will ask your consent

to record this information. Not agreeing to us recording this information may impact on our ability to make adjustments for your circumstances. We collect this information so that we can treat you fairly and according to your needs.

Who do we share your information with?

We may share your information with:

- the broker who introduced you;
- third party service providers, such as tracing agents, our legal advisors and our website support;
- CRAs and FPAs to which we may report positive, delinquent and default data about your account(s) on a regular (minimum monthly) basis;
- law enforcement agencies or regulatory bodies where we are required to do so;
- other members of our group of companies including our parent company in the Netherlands which provides us with certain customer service, business administration and website support;
- any purchaser or proposed purchaser of all or part of the same or their assets, together with their professional advisors;
- you or your third party representatives (in line with your rights); or
- 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 advisors;
- we believe, in good faith, that it is necessary to protect our rights, property, safety or reputation or the rights, property, safety or reputation of any of our clients or partners.

Records remain on file with CRAs and FPAs for 6 years after they are closed, whether settled by you or defaulted. This information may be supplied to other organisations which search your credit record. More information about CRAs and how they use personal information is available at www.experian.co.uk/crain/index.html in a document called the Credit Reference Agency Information Notice (also known as the "CRAIN"). You can also contact the agencies below:

Callcredit	Consumer Services Team, PO Box 491, Leeds, LS3 1WZ Tel: 0330 024 7579 or visit www.callcredit.co.uk
Equifax PLC	Credit File Advice Centre, PO Box 3001, Bradford, BD1 5US Tel: 0870 010 0583 or visit www.myequifax.co.uk
Experian	Consumer Help Service, PO Box 8000, Nottingham, NG80 7WF Tel: 0870 241 6212 or visit www.experian.co.uk

To find out more about how we share your information with CRAs please see Annex 1.

The personal information we have collected from you may be shared by CRAs with FPAs 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. Further details of how your information will be used by us and these fraud prevention agencies, and your data protection rights, can be found in the CRAIN.

Where is your information stored?

The information we collect about you will be held on our secure servers within the European Economic Area (the EEA) and will not be transferred or stored outside the EEA.

Data Security

We implement appropriate technical and organisational measures to protect the security of your information and to prevent unauthorised access, including [encryption, fire walls, data back-ups, policies and procedures, access protocols]. Unfortunately, transmission of information via the internet may never be completely secure and you should ensure when using our website as with any other online services that you have appropriate protections in place (such as anti-virus software and an up-to-date web-browser).

We never ask for payment details (such as your account or card number) via email so if you receive a suspicious email purporting to be from us, please contact via email info@swisfund.co.uk or phone 01223 803877. Your use of our website is subject to our website terms of use which are available [here](#).

How long will your information be kept on file?

We keep your information for as long as it is needed to provide you with the services you have requested and, to the extent it is necessary for the protection of our legitimate interests (the management of legal risks and administration of our business), for six years from the end of your credit agreement with us (if you take out a loan). Where you partially complete an

application, or are declined we will keep your information for up to six year, so you can pick up where you left off.

Your rights

<i>Right of access</i>	You have a right to access the personal information we hold about you and be told why we use it
<i>Right of rectification</i>	You can ask us to correct or update your information to ensure it is accurate and complete.
<i>Right to erasure and right to restrict processing</i>	You can ask us to stop processing and to delete your data in certain circumstances (for example where it is processed with your consent, or it is no longer necessary for us to process it).
<i>Right to data portability</i>	You have a right to ask us to provide you with information in a form that suits you, and/or to provide your information to a third party.
<i>Right to object</i>	You have a right to object to our processing of your information.
<i>Rights: profiling and automated decisions</i>	You have a right not to be subject to automated decisions which have a legal effect and to be protected by safeguards in respect of any profiling.
<i>Right to object to direct marketing</i>	Where you are an individual and have consented to receive direct marketing you can change your mind at any time by contacting us or following the directions in each message. Please allow a few days for us to action your request
<i>Rights in relation to CRAs</i>	You have a right to be told which CRAs we have used and obtain a copy of your file from CRAs.

You can exercise the above rights by contacting us. Further information is also available from the ICO's website (www.ico.org.uk).

Contact and complaints

If you have question, want to exercise your rights or make a complaint about our use of your information, please contact us using the details above, or by email to info@swishfund.co.uk.

You can also make a complaint to the ICO, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF, telephone 0303 123 1113. www.ico.org.uk.

Automated decision making

We use automated decision-making and profiling techniques to automatic decline applications.

Updates

Updates to this policy are published to this page on our website from time to time, so please check back for updates. Where appropriate, we may also send updates by email.

Annex 1

In order to process your business' application, we will perform credit and identity checks on you with one or more credit reference agencies ("CRAs").

To do this, we will supply your personal information to CRAs and they will give us information about you. This will include information from your credit application and about your financial situation and financial history. CRAs will supply to us both public (including the electoral register) and shared credit, financial situation and financial history information 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 to us;
- Prevent criminal activity, fraud and money laundering;
- Manage your account(s);
- Trace and recover debts; and
- Ensure any offers provided to you are appropriate to your circumstances.

We will continue to exchange information about you with CRAs while you have a relationship with us. We will also inform the CRAs about your settled accounts. If you borrow and do not repay in full and on time, CRAs will record the outstanding debt. This information may be supplied to other organisations by CRAs.

When CRAs 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 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 in the CRAIN (see the links in our Privacy Notice).

THE 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:

Call Credit:

- www.callcredit.co.uk/crain

Equifax

- www.equifax.co.uk/crain

Experian:

- www.experian.co.uk/crain

ANNEX 2 – Cookies

What Are Cookies

As is common practice with almost all professional websites this site uses cookies, which are tiny files that are downloaded to your computer, to improve your experience. This page describes what information they gather, how we use it and why we sometimes need to store these cookies. We will also share how you can prevent these cookies from being stored however this may downgrade or 'break' certain elements of the sites functionality.

For more general information on cookies see the Wikipedia article on HTTP Cookies.

How We Use Cookies

We use cookies for a variety of reasons detailed below. Unfortunately in most cases there are no industry standard options for disabling cookies without completely disabling the functionality and features they add to this site. It is recommended that you leave on all cookies if you are not sure whether you need them or not in case they are used to provide a service that you use.

Disabling Cookies

You can prevent the setting of cookies by adjusting the settings on your browser (see your browser Help for how to do this). Be aware that disabling cookies will affect the functionality of this and many other websites that you visit. Disabling cookies will usually result in also disabling certain functionality and features of the this site. Therefore it is recommended that you do not disable cookies. For further information about cookies and how to disable them please go to the Information Commissioner's webpage on cookies: <https://ico.org.uk/for-the-public/online/cookies/>

The Cookies We Set

If you create an account with us then we will use cookies for the management of the signup process and general administration. These cookies will usually be deleted when you log out however in some cases they may remain afterwards to remember your site preferences when logged out.

Third Party Cookies

In some special cases we also use cookies provided by trusted third parties. The following section details which third party cookies you might encounter through this site.

This site uses Google Analytics which is one of the most widespread and trusted analytics solution on the web for helping us to understand how you use the site and ways that we can improve your experience. These cookies may track things such as how long you spend on the site and the pages that you visit so we can continue to produce engaging content.

For more information on Google Analytics cookies, see the official Google Analytics page.

From time to time we test new features and make subtle changes to the way that the site is delivered. When we are still testing new features these cookies may be used to ensure that you receive a consistent experience whilst on the site whilst ensuring we understand which optimizations our users appreciate the most.

As we sell products it's important for us to understand statistics about how many of the visitors to our site actually make a purchase and as such this is the kind of data that these cookies will track. This is important to you as it means that we can accurately make business predictions that allow us to monitor our advertising and product costs to ensure the best possible price.

Several partners advertise on our behalf and affiliate tracking cookies simply allow us to see if our customers have come to the site through one of our partner sites so that we can credit them appropriately and where applicable allow our affiliate partners to provide any bonus that they may provide you for making a purchase.

More Information

Hopefully that has clarified things for you and as was previously mentioned if there is something that you aren't sure whether you need or not it's usually safer to leave cookies enabled in case it does interact with one of the features you use on our site.

However if you are still looking for more information you can contact us through one of our preferred contact methods, via email info@swisfund.co.uk or phone 01223 803877, Weekdays 9am - 5pm.