

# **Cashflow Leasing Privacy Policy**

#### Who we are

Cashflow Leasing are a trading style of Owl Options & Investments Limited which are Commercial Finance Brokers based in the U.K. We act as an introducer and Broker for our customers. Cashflow Leasing do not need to be Authorised and Regulated by the Financial Conduct Authority as we are solely dealing with limited companies and not Individuals.

# How we will use the information about you

Here at Cashflow Leasing we take your privacy seriously and will use your personal information in several ways which will help us;

- 1. make lender decisions,
- 2. for fraud prevention,
- 3. for audit,
- 4. credit reference checks

We may share your information with, and obtain information about you from, credit reference agencies or fraud prevention agencies. When applying to us for lending, we will pass your details onto the Financial Provider for underwriting purposes. Any Information you provided may be put onto a register of claims and shared with others to prevent fraudulent claims.

We will not disclose your information to any company outside of our bank of financial lenders except to help prevent fraud or if required by law to do so.

### **Additional Marketing**

#### **Your Personal Data:**

### What we need

Cashflow Leasing will be what is known as the processor of the personal data you provide to us. We collect personal data about you which may also include any special types of information or location-based information for application and Anti Money Laundering purposes.

### We also gather

Names, addresses, email & telephone numbers, business details, project and other financial and personal information will be needed to process your application



### Why we need it

We need to know your basic personal and company data to provide you with an accurate recommendation for your personal circumstances. We will not collect any personal or company data from you, that we do not need to provide and oversee this service to you.

For processing of data to be lawful under GDPR Cashflow Leasing use.

- (a) Consent: the individual has given clear consent for you to process their personal data for a specific purpose.
- (b) Contract: the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.
- (c) Legal obligation: the processing is necessary for you to comply with the law (not including contractual obligations).
- (d) Vital interests: the processing is necessary to protect someone's life.
- (e) Public task: the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.
- (f) Legitimate interests: the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests. (This cannot apply if you are a public authority processing data to perform your official tasks.)

# What we do with it

Automated Decision Making: Cashflow Leasing will pass your data captured to lenders whom may use automated decision-making in respect of your application for finance. We will only collect the minimum amount of data needed and have a clear retention policy for the profiles we create.

All the personal data we use is controlled by Cashflow Leasing in the UK, however, for the purposes of IT hosting and maintenance, this information is located on servers within the European Union. No 3rd parties have access to your personal data unless the law allows them to do so. We have a Data Protection regime in place to oversee the effective and secure processing of your personal data.

We may pass your data to 3<sup>rd</sup> parties to provide you with offers of products suitable to meet your customer requirements.

Your data is stored electronically on our cloud encrypted server. Our server is based in the UK

### How long we keep it

We are required under regulation to keep your basic personal data, such as Names, addresses, email & telephone numbers, business details, projects and other financial information needed to process your application for a minimum of 6 years, after which time it will be destroyed. The information used for marketing will be kept with us until you notify us that you no longer wish to receive this information.

#### What are your rights?



If at any point you believe retained information is incorrect you can request to see this information and even have it corrected and possibly deleted. Providing you with this information is free of charge, but charges may apply for excessive requests.

If you wish to raise a complaint on how we have handled your personal data, you can contact our Data Protection Officer who will investigate the matter.

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

More information about your rights can be found on the Information Commissioners website. https://ico.org.uk/

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).

Our Data Protection Officer is Claire Saunders and you can contact them at sales@cashflowleasing.co.uk.

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Signed	Print Name
Dated On behalf of	(Company)