PORTMAN
PERSONAL PROFESSIONAL BUSINESS FINANCE

SCHEDULE 1 – PRIVACY NOTICE

Version 1.33

Privacy Notice

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. We operate under UK data protection legislation including the Data Protection Act 2018 ('DPA') and the UK General Data Protection Regulation ('GDPR').

In this Privacy Notice we explain:

1) Who we are
2) How you can contact us
3) What kinds of personal data we collect and hold about you and where we get it from
4) Why we collect your personal data and what we use it for
5) The legal basis upon which we collect, process and store your personal data
6) Where your personal data is stored and processed
7) Who we share your personal data with, what personal data we share and why we do so
8) How long we will store your personal data
9) Your rights to your personal data and,in particular:
    a. your right of access to your personal data
    b. your right of rectification to your personal data
    c. your right of erasure of your personal data (also known as the right to be forgotten)
    d. your right to have processing of your personal data restricted
    e. your right to object to the processing of your personal data
    f. your right to data portability
    g. your right not to be subject to automated decision making and profiling
    h. your right to complain to The Information Commissioner
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Note: You have the right to object to us processing your personal data - please see section 9(e) below

1. Who we are

We are Portman Finance Group (Portman), a collective group of companies who offer credit broking and lending to UK SME's. Portman includes Portman Business Finance Limited who are a finance broker registered in England and Wales under company number 14742864; Portman Financial Services Limited who are a finance broker registered in England and Wales under company number 14118062; Portman Leasing Limited, who are a lender of hire agreements registered in England and Wales under company number 06797365; Portman Commercial Finance Limited, who are a lender of credit agreements registered in England and Wales under company number 10011121, and Portman Operations Limited registered in England and Wales under company number 12964662. Portman have our registered office at Portman House, 300 Pavilion Drive, Northampton Business Park, Northampton, NN4 7YE. Portman Financial Services Limited is authorised and regulated by The Financial Conduct Authority (FCA) FRN 976903. Portman Financial Services Limited is a credit broker not a lender. The firm deals with a panel of lenders and asset finance providers. We are the data controller for information that you provide to us and of information that we hold about you from third parties.

2. How to contact us

You can contact us in one of the following ways:

By writing to Data Protection, Portman House, 300 Pavilion Drive, Northampton Business Park, Northampton, NN4 7YE or by sending an e-mail to our Data Protection team at info@portmanfinancegroup.co.uk

3. What kinds of personal data we collect and hold about you and where we get it from

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity data** includes first name, maiden name, last name, title.
- **Contact data** includes email address, telephone numbers and address (personal and/or business).
- **Technical data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile data** includes, in relation to your online account, your username and password.
- **Usage data** includes information about how you use our website and services.
- **Marketing and communications data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

- **Financial data includes** information which you supply in relation to your business (bank statements, company accounts etc), information which we receive from third parties about your financial performance, information from credit reference agencies and information from third parties who provide services such as open banking.

We may also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

Please note that where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to progress an application for finance). In this case, we may have to cancel an application or a service you have requested but we will notify you if this is the case at the time.

a. Finance customers

Where:

(1) you are an individual, sole trader, a partner in a partnership or a member of an unincorporated club or association or an employee of one of these, applying for or entering into a hire purchase, lease arrangement, commercial loan agreement or giving a guarantee or other security either solely or jointly with another person for your own account or as an attorney, trustee, a partner in a partnership or as a member of an unincorporated club or association; or

(2) our customer or person applying for or entering into a hire purchase, lease arrangement, commercial loan agreement or giving a guarantee or other security is a company or other incorporated entity and you are a relevant individual such as an owner, director and officer or authorised signatory;

then we may collect and process the following types of personal data about you:

- all the information that you, our customer or the supplier provides to us when obtaining a quote or applying for finance with us either on-line or by paper application, such as your name, address, contact details, asset details and finance requirements.
- all the information that you, our customer or the supplier gives to us over the phone, by e-mail, by post or via our website when obtaining a quote or applying for a hire purchase or lease facility with us, such as your name, address, contact details, asset details and finance requirements.
- all the documents that you, our customer or the supplier/third party broker sends to us when obtaining a quote or applying for finance with us, such as copies of your passport, drivers licence and utility bills.
- all the information that you, our customer or the supplier gives to us over the phone, by e-mail, by post or via our website when we contact each other from time to time during the course of managing or arranging your finance agreement such as updated contact information and your bank details.
- information that our customers provide to us about you where we arrange funding to our customers to enable them to provide you (or the businesses that you work for) with finance facilities.
- the information relating to any finance agreement such as account balance, interest rate, and payments.
- your credit score results and financial crime check results that we receive from credit reference agencies and fraud prevention agencies.
- where relevant, the information about you that we obtain from public registers such as HM Companies House, HM Land Registry or the Charity Commission. This will usually be to confirm your status, for example, where we are providing facilities to a company of which you are a director, confirming you are a director of that company.
- where relevant, information provided by your or our professional advisers during the course of providing finance facilities such as valuers, solicitors and accountants. This could include, for example, valuations or financial information.
- valuation information relating to any assets hired or leased or over which we have security.
- we obtain information about you from third parties including, where relevant, HM Companies House, HM Land Registry, the Charity Commission, Credit Safe, Experian and Equifax. We may also obtain information about you from a search of publicly available information on search engines like Google.
- We obtain business contact information from third party data providers. This could either be when purchasing data to market to prospective businesses, or to enhance, cleanse or update the existing business records we have on our database. All third-party providers are compliant with UK data protection legislation and provide data which has been determined by the providers to be business contact information. If you would like more details on our third-party providers or feel that the information we hold is inaccurate or unrelated to the business account, please contact us using the details in this notice.

We will also collect information detailed above in relation to your business. Whilst not strictly personal data, the information collected could contain pieces of personal data. In addition to the types of information listed above, we will obtain the following

information on your business:

- Financial information on your business, including accounts information from HM Companies House and Credit Reference Agencies.
- Business banking information, supplied by you in the form of bank statements, or through your acceptance of open banking.

b. Suppliers, lenders and other people we do business with

Where:

(1) you are a sole trader, a partner in a partnership or a member of an unincorporated club or association or an employee of one of these providing goods or services to us; or

(2) you are a company or other incorporated entity and you are a relevant individual such as an owner, officer, authorised signatory or employee with whom we deal in the provision of those goods or services; then we will collect and process the following types of personal data about you:

- all the information that you, our supplier provides to us when tendering for or negotiating for the supply of goods or services contracts, for example name, address, contact details, and the credentials of key people providing the goods or services or running the supplier.
- all the information that you, our supplier gives to us over the phone, by e-mail, by post or via our website when we contact each other from time to time during the course of managing the supply of goods or services, for example, updated contact information and bank details.
- your credit score results and financial crime check results that we receive from credit reference agencies and fraud prevention agencies during our supplier take-on process and during the course of managing the supplier relationship.
- where relevant, third party references we obtain as to your suitability as suppliers.
- where relevant, the information about you that we obtain from public registers such as HM Companies House, HM Land Registry or the Charity Commission. This will usually be to confirm your status, for example, where we are receiving goods or services from or otherwise contracting with a company of which you are a director, confirming you are a director of acompany.
- where relevant, information provided by your or our professional advisers during the course of the supplier take-on and on-going supplier relationship management, such as from solicitors and accountants. Information from our own internet searches, for example location and services information or reviews from websites like Google or information to support background checks where this is relevant to your track record as a supplier.
- we obtain information about you from HM Companies House, HM Land Registry, the Charity Commission, Credit Safe, Experian and Equifax. We may also obtain information about you from a search of publicly available information on search engines like Google.

We will also collect information detailed above in relation to your business. Whilst not strictly personal data, the information collected could contain pieces of personal data. In addition to the types of information listed above, we will obtain the following information on your business:

- Financial information on your business, including accounts information from HM Companies House and Credit Reference Agencies.
- Business banking information, supplied by you in the form of bank statements, or through your acceptance of open banking.

c. Methods of collection

We use different methods to collect data from and about you including through:

- **Direct interactions**. You may give us your Identity, and Contact Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - complete our enquiry form on our website,
  - contact us by telephone or email to seek a quote;
  - apply for finance or otherwise send us information to support your finance application;
  - participate in a tender process to become a supplier; and
  - when you instruct us to provide services for you by telephone or email and you become our customer.
- **Third parties or publicly available sources**. We may receive personal data about you from various third parties, including data providers and Technical Data from analytics providers such as Google based outside the EU. Any personal data we obtain via data providers will have been determined by that provider to be business contact information and is provided, either as a prospect to be marketed or to enhance, cleanse or update existing information we hold on the business.

- **Cookies**. Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them, refer to our Cookie Policy as detailed on the website, and accessible **here**.
    - Cookies are pieces of information that a website transfers to your computer's hard disk for record-keeping purposes. Cookies can make the internet more useful by storing information about your preferences on a particular site, such as your personal preference pages.
    - The use of cookies is an industry standard, and most websites use them to provide useful features for their customers. Cookies in and of themselves do not personally identify users, although they do identify a user's computer. Most browsers are initially set to accept cookies.
    - If you would prefer, you can set yours to refuse cookies. However, you may not be able to take full advantage of a website if you do so.

4. Why we collect your personal data and what we use it for

a. Finance customers

We collect and process your personal data:

- so that we can properly provide our services to you, including for example, to search, find and broker to appropriate lenders and finance providers for you, take instructions and operate your account, enter into lending agreements with you, undertake appropriate due diligence, manage the relationship with you, assist in managing our lenders credit risk, deal with payments, deal with repayment and where appropriate deal with the asset at the end of the hire purchase or lease and close your account.

- so that we can fulfil our legal and regulatory obligations, for example, to undertake proper checks on our customers to help prevent and detect crime.

- to comply with our legal and regulatory obligations, for example, to report to regulators and authorities about the products and services that we provide to you.

- to offer you financial products and services.

- to maintain and improve the quality of our products and the way we provide our services, to protect and defend our legal rights.

b. Suppliers, brokers and other people we do business with

We collect and process your personal data:

- so that we can assess the suitability of the supplier, including undertaking appropriate background checks and on-going monitoring.
- to contact the supplier and manage the supplier relationship and provision of the goods or services; and to protect and defend our legal rights.

c. Automated decision making and profiling

Machine Learning is a subset of artificial intelligence and uses statistical techniques to enable programs to 'learn' through training, rather than being programmed with set rules. Machine learning systems process training data to progressively improve performance on a task.

We use automated decision making and machine learning to help assess your funding opportunities based on publicly available information, information provided by third parties and information that you provide to us directly during the application process. While this is predominantly information about your business, there could be some personal data included in the data subset used to improve decision making and machine learning. Portman do not use automated decision making exclusively and will always have one of our team review the business as part of the application process. The automated decision making is used to assist accuracy and improve outcomes for your business in the application process.

d. How we promote our business

When using direct channels such as email, direct mail and telephone, we only promote our service to existing customers, businesses who have previously enquired with us and UK limited companies who meet our eligibility criteria. We do this through permission-based and lawful marketing channels. Our communications are sent based on your consent preferences or our legitimate commercial interests. All direct communications include clear sender identification and offer the opportunity to opt-out of future contact.

We review marketing material prior to its use and have an internal sign-off process to ensure our messaging and customer selection meets the highest standards. We monitor all outbound printed, email and telephone communication for adherence with these standards. Deliberate breaches of our controls will result in disciplinary proceedings, including in some circumstances, dismissal.

Where a recipient of any communication is unhappy with our contact, our Client Relations team will act as a dedicated point of contact for the customer and handle any complaints.

Any marketing partners, affiliates, and third parties are contractually required to comply with applicable anti-spam laws, obtain any relevant consent before messaging recipients, provide clear identification and an unsubscribe option where required, and must not use misleading or deceptive practices. We monitor promotional activity and investigate complaints; partners found to be sending unsolicited messages are removed.

5. The legal basis upon which we collect, process and store your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- To deal with and/or respond to any enquiry or request made by you prior to entering into any contract with us or as a result of such contract.
- Where we need to perform the contract, we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation. Where we have your consent. Generally, we do not rely on consent as a legal basis for processing your personal data.

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The UK's data protection law allows the use of personal data where its purpose is legitimate and isn't outweighed by the interests, fundamental rights or freedoms of data subjects. The law calls this the legitimate interests condition for personal data processing.

As explained above, we only collect, use and store the minimum amount of personal data about you that is necessary for us to provide you with our products and services and to comply with our legal and regulatory obligations arising as a result of us providing those products and services to you. Accordingly, the basis that we collect, use and store your information is primarily because we have a legitimate interest to do so as a finance group providing these products and services to you.

Our legitimate interests include:

- to act as a prudent and responsible finance broker and lender; to undertake reference checks, credit checks and risk assessments;
- to help combat financial crime including tax evasion, bribery, fraud and money-laundering; to maintain network and information security;
- to meet our legal and regulatory obligations;
- to protect and defend our legal rights;
- to maintain accurate records including customer preferences;
- to enhance, modify and improve our products and services;
- for direct marketing (if we have asked you for your consent, where required, or under third party licence);
- to manage third party relationships; and
- to pursue our commercial objectives as a finance broker and lender where this does not override your rights and freedoms as a data subject.

When we process your personal information for our legitimate interests, we make sure to consider and balance any potential impact on you (both positive and negative), and your rights under data protection laws. Our legitimate business interests do not automatically override your interests - we will not use your Personal Data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

If we have asked you for your consent to process your information for direct marketing purposes and you have not given it to us then we will not process your information for those purposes. If you decide that you do not wish to receive direct marketing from us then we will stop processing your information for marketing purposes at any time you tell us that you no longer wish to receive marketing from us. You can do this by following the unsubscribe link at the bottom of any marketing email received from us, or by emailing us using the contact details in section 2 above.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. We do not process your data for automated decision-making or profiling purposes.

The table below provides more detailed information on our lawful ground(s) for processing, having regard to the type of personal data and the purpose of processing, together with information about how long that data will be retained by us.

Category of Personal Data	Purpose of Processing	Lawful Basis for Processing	Retention Period
Name and contact details	Undertaking customer due diligence checks for the prevention and detection of financial and other crimes and undertaking checks, including on related parties (for example directors, beneficial owners and guarantors), in relation to identity verification, application checks, anti-money laundering, compliance and risk screening Customer administration and management Transaction processing, monitoring and analysis activities to develop and manage Portman's products and services Communicating with our customers and related parties from time to time about products, services, events offered by us, and other communications such as research and insights, that may be of interest to the customer and related parties. Complying with legal obligations to which we are subject and co-operating with regulators and law enforcement bodies. Exercising our legal rights where it is necessary to do so, for example to protect Portman against harm to its rights and property interests, to detect, prevent and respond to fraud or other violations of law, for legal and dispute	Performance of contract Compliance with legal obligation Consent Legitimate Interest in operating our business, maintaining accurate and up to date records, direct marketing, developing our products and services	The retention period is linked to the amount of time available to bring a legal claim, which in many cases is six or seven years following closure of the customer('s) accounts or following a transaction. Portman will retain customer Personal Data after this time if it is required to do so to comply with the law, if there are outstanding claims or complaints that will reasonably require customer personal data to be retained, or for regulatory or technical reasons. Where Portman retains this data it will continue to make sure that related parties' privacy is protected.

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	management purposes, and for debt collection and recoveries purposes To contact you with information, newsletters and marketing materials about our products and services, and other relevant products and services as provided by our partners We collect, use and keep the information we receive via our website to fulfil the visitor's requests. We will use your information to respond to a request submitted by you, to provide the Service to you and to carry out our obligations from any contracts entered into between you and us; Contact you and provide you with information regarding Portman and our products and services; Correspond with you; Comply with applicable laws, regulations and rules, and requests of governmental agencies. To enable us to receive reports from Credit Reference Agencies where required. The information is required as part of any application for finance, where the information is for a sole proprietor, a partner in a partnership, a director or ultimate beneficial owner of a corporate entity, a contact for the business or where someone is providing a personal guarantee in support of an application.		
Date of birth	For fraud prevention and detection Obtain credit reports from credit reference agencies To complete electronic AML checks The information is required as part of any application for finance, where the information is for a sole proprietor, a partner in a partnership, a director or ultimate beneficial owner of a corporate entity, or where someone is providing a personal guarantee in support of an application.	Performance of contract Compliance with legal obligation Legitimate interest in acting as a prudent and responsible finance broker and lender; to undertake reference checks, credit checks and risk assessments, and combat financial crime	The retention period is linked to the amount of time available to bring a legal claim, which in many cases is six or seven years following closure of the customer('s) accounts or following a transaction. Portman will retain customer Personal Data after this time if it is required to do so to comply with the law, if there are outstanding claims or complaints that will reasonably require customer personal data to be retained, or for regulatory or technical reasons. Where Portman retains this data it will continue to make sure that related parties' privacy is protected.
Payment information	For the repayment of loans, and other products and services offered via our partners or directly	Performance of contract Compliance with legal obligation Legitimate Interest in collecting sums due to us and/or our partners	The retention period is linked to the amount of time available to bring a legal claim, which in many cases is six or seven years following closure of the customer('s) accounts or following a transaction. Portman will retain customer Personal Data after this time if it is required to do so to comply with the law, if there are outstanding claims or complaints that will reasonably require customer personal data to be retained, or for regulatory or technical reasons. Where Portman retains this data it will continue to make sure that related parties' privacy is protected.
Browser, device and Site usage information	To improve marketing, analytics, or site functionality.	Performance of contract Legitimate interest in maintaining our Site	For three years since you last logged on to the Site
Personal details (e.g. name, date of birth, identification information,) Contact details (e.g. phone number, email address, postal address, mobile number) Business-related details (e.g. relationship with the business or related parties, business information, information about any shareholdings, business contact details) Transactional details (e.g. information about services,	Undertaking customer due diligence checks for the prevention and detection of financial and other crimes and undertaking checks, including on related parties (for example directors, beneficial owners and guarantors), in relation to identity verification, application checks, anti-money laundering, compliance and risk screening Customer administration and management Transaction processing, monitoring and analysis activities to develop and manage Portman's products and services Communicating with the customer and related parties from time to time about products, services, events offered by Portman, and other communications such as research and insights, that may be of interest to the customer and related parties. Complying with legal obligations to which we are subject and co-operating with regulators and law enforcement bodies Exercising our legal rights where it is necessary to do so, for example to protect Portman against harm to our rights and property interests, to detect, prevent and respond to fraud or other violations of law, for legal and dispute management purposes, and for debt collection and recoveries purposes To contact you with information, newsletters and marketing materials about our products and services, and other relevant products and services as provided by our partners We collect, use and keep the information we receive via our website to fulfil the visitor's requests. We will use your information to respond to a request	Legitimate Interest in operating our business, acting as a prudent and responsible finance broker and lender, maintaining accurate records, developing our products and services, direct marketing. Performance of contract Compliance with legal obligations Consent	The retention period is linked to the amount of time available to bring a legal claim, which in many cases is six or seven years following closure of the customer('s) accounts or following a transaction. Portman will retain customer Personal Data after this time if it is required to do so to comply with the law, if there are outstanding claims or complaints that will reasonably require customer personal data to be retained, or for regulatory or technical reasons. Where Portman retains this data it will continue to make sure that related parties' privacy is protected

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requests, queries or complaints) Financial details (e.g. information about business accounts, financial history, information from credit reference agencies and fraud prevention agencies) Profile data (i.e. where you apply for finance online)	submitted by you, to provide the Service to you and to carry out our obligations from any contracts entered into between you and us; Contact you and provide you with information regarding Portman and our products and services; Correspond with you; Comply with applicable laws, regulations and rules, and requests of governmental agencies. Occasionally, Portman may collect special categories of personal data (also known as sensitive personal data) where it would be in your benefit to do so. This would usually be medical data provided by you which we would require to assist you with your customer experience. For example, if you disclosed a medical condition which could affect your ability to repay any finance which you had taken out, this may be recorded with your consent and passed onto our lenders where appropriate. When we are collecting special category data, we will always ensure there is a lawful basis to do so and this will usually be through your explicit consent. If incorrect information is provided, or fraud is suspected, Portman will record this. Portman may also pass this information to financial crime prevention agencies where it may be accessed by law enforcement agencies globally. Portman may be required by law to collect certain personal data, or as a consequence of its contractual relationship with its customers. Failure to provide this information may prevent or delay the fulfilment of these obligations. The information is required as part of any application for finance.		
Data requested from Credit reference agencies and fraud prevention agencies	To assess creditworthiness and product suitability, check the identities of customers and related parties (for example directors, beneficial owners and guarantors),, manage the customer's account, trace and recover debts and prevent criminal activity. Portman will also continue to exchange customer and related parties' information with credit reference agencies on an ongoing basis. Credit reference agencies will share customer and related parties' information with other organisations. The personal information we have collected from you will be shared with 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. Further details of how your information will be used by us and these fraud prevention agencies, and your data protection rights, can be found here: https://www.cifas.org.uk/fpn	Legitimate Interest in operating our business, collecting sums due to us and/or our partners, in acting as a prudent and responsible finance broker and lender, to undertake reference checks, credit checks and risk assessments, and combat financial crime Performance of contract Compliance with legal obligations Consent	The retention period is linked to the amount of time available to bring a legal claim, which in many cases is six or seven years following closure of the customer('s) accounts or following a transaction. Portman will retain customer Personal Data after this time if it is required to do so to comply with the law, if there are outstanding claims or complaints that will reasonably require customer personal data to be retained, or for regulatory or technical reasons. Where Portman retains this data it will continue to make sure that related parties' privacy is protected.
Data supplied by third party data providers	The data supplied has been verified by the providers as business contact data and will be used either be used to prospect new customers, or to enhance, update or cleanse existing business contact data. The third parties include Cognism Limited who provide business contact information which may include personal data. With your separate and explicit consent, we will use a third party open banking provider who will provide access to your business banking information. This information will be used to assist with your application for finance and will also be supplied to our lenders where appropriate in order for them to complete their underwriting decision.	Legitimate Interest in developing our business, products and services Performance of contract Compliance with legal obligations Consent	Where the data is purchased under licence for a period of time, the data will be retained for the duration of the licence. Where there are no time constraints, the retention period is linked to the amount of time available to bring a legal claim, which in many cases is six or seven years following closure of the customer('s) accounts or following a transaction. Portman will retain customer Personal Data after this time if it is required to do so to comply with the law, if there are outstanding claims or complaints that will reasonably require customer personal data to be retained, or for regulatory or technical reasons. Where Portman retains this data it will continue to make sure that related parties' privacy is protected.
Call Recordings and transcriptions	Portman record and transcribe all calls to assist in training, fraud prevention, regulatory requirements and complaint handling. The content in the recordings will include personal data.	Legitimate Interest in operating our business, acting as a prudent and responsible finance broker and lender, to protect and defend our legal rights, and to maintain accurate records Performance of contract Compliance with legal obligations	The retention period is linked to the amount of time available to bring a legal claim, which in many cases is six or seven years following closure of the customer('s) accounts or following a transaction. Portman will retain customer Personal Data after this time if it is required to do so to comply with the law, if there are outstanding claims or complaints that will reasonably require customer personal data to be retained, or for regulatory or technical reasons. Where Portman retains this data it will continue to make sure that related parties' privacy is protected.

Biometric Data	Portman may use a third party provider (Onfido) to confirm the identity of the signatory via facial recognition when finance agreements are electronically signed	Consent	Onfido store scanned data for a maximum of 360 days or 3 years for the visual data. Portman will retain the identity document image used as part of the identity verification process, such as a passport or driving licence, as supporting evidence of the verification undertaken. This information may be retained to enable Portman to respond to disputes, suspected fraud, audits, legal or regulatory enquiries, and to demonstrate compliance with its legal and regulatory obligations. The identity document image will be retained in accordance with Portman's applicable data retention periods and securely deleted when it is no longer required.

6. Where your personal data is stored and processed

We are based in the UK, and we keep our filing systems and databases here.

We may be required to send or allow access to personal data from elsewhere in the world. This might be the case, for example, when someone providing support services to us is based overseas or uses overseas data centres or where suppliers of assets being purchased via a hire purchase or through a lease agreement, are based overseas.

While countries in the European Economic Area all ensure a high standard of data protection law, some parts of the world may not provide the same level of legal protection when it comes to personal data. As a result, if we do send personal data overseas we will make sure suitable safeguards are in place in accordance with UK data protection requirements, to protect the data.

If your data has been sent overseas like this, you can find out more about the safeguards used from us.

Whenever fraud prevention agencies transfer your personal data outside of the European Economic Area, they impose contractual obligations on the recipients of that data to protect your personal data to the standard required in the European Economic Area. They may also require the recipient to subscribe to 'international frameworks' intended to enable secure data sharing.

7. Who we share your personal data with, what personal data we share and why we do so

Your personal data will only be disclosed to those of our employees or workers that have a need for such access for the purpose for which it was collected. We do not sell any of your information to third parties, we will not give anyone your information, other than those working directly with us, so that they can market to you.

- **Lenders and Asset Finance Providers**

We will pass your relevant details on to selected members of our panel of Lenders and Asset Finance providers, for the purpose of obtaining you or your business finance. This may be used by them to search credit reference agencies and other third-party verification services.

They may pass your details on to credit reference agencies and fraud prevention agencies and they will receive scores and reports from them.

They and fraud prevention agencies may also enable law enforcement agencies to access and use your personal data to detect, investigate and prevent crime. Please note that fraud prevention agencies can hold your personal data for different periods of time, and if you are considered to pose a fraud or money laundering risk, your data can be held for up to six years.

If they, or a fraud prevention agency, determine that you pose a fraud or money laundering risk, they may refuse to provide the services and financing you have requested or they may stop providing existing services to you. A record of any fraud or money laundering risk will be retained by the fraud prevention agencies and may result in others refusing to provide services or financing to you. If you have any questions about this, please contact us on the details provided.

Searches they make with credit reference agencies will leave a 'footprint' on your file and they will also provide them with information relating to your performance under your account or facility. These 'footprints' and performance details may be accessed by other financial companies in connection with any applications for credit that you may make to them and may affect your ability to obtain credit with them.

Your application may be assessed using credit reference agency records relating to anyone with whom you have a joint account or similar financial association. Where you make a joint application and such a link does not already exist then one may be created. These links will remain until you file a "notice of disassociation" at the credit reference agencies.

The type of information we share includes, for example, your name, date of birth, address, financial details the fact that you have applied or operate an account with them and whether you have operated your account appropriately. As part of the finance application, any information you supply directly to us or indirectly to us through a third party (for example, if you consent to the use of open banking), will be provided to the lender in order for them to underwrite the application and make an assessment on whether they will offer you finance.

In each case, the relevant lender or asset finance provider will itself be an independent controller of your personal data and their own privacy notices will apply to their handling of your personal data.

- **Credit Reference Agencies and Fraud Prevention Agencies**

PORTMAN
PERSONAL PROFESSIONAL BUSINESS FINANCE

SCHEDULE 1 – PRIVACY NOTICE

In order to receive credit and financial crime check information about you from credit reference agencies we are required, on a reciprocal basis, to share information about you with those credit reference and fraud prevention agencies.

We may pass your details on to credit reference agencies and fraud prevention agencies and we will receive scores and reports from them. We and fraud prevention agencies may also enable law enforcement agencies to access and use your personal data to detect, investigate and prevent crime. Please note that fraud prevention agencies can hold your personal data for different periods of time, especially if you are considered to pose a fraud or money laundering risk.

If we, or a fraud prevention agency, determine that you pose a fraud or money laundering risk, we may refuse to provide the services and financing you have requested or we may stop providing existing services to you. A record of any fraud or money laundering risk will be retained by the fraud prevention agencies and may result in others refusing to provide services or financing to you. If you have any questions about this, please contact us on the details provided.

Searches we make with credit reference agencies will leave a 'footprint' on your file and we will also provide them with information

relating to your performance under your account or facility. These 'footprints' and performance details may be accessed by other financial companies in connection with any applications for credit that you may make to them and may affect your ability to obtain credit with them.

Your application will be assessed using credit reference agency records relating to anyone with whom you have a joint account or similar financial association. Where you make a joint application and such a link does not already exist then one may be created. These links will remain until you file a "notice of disassociation" at the credit reference agencies.

The type of information we share includes, for example, your name, date of birth, address, the fact that you have applied or operate an account with us and whether you have operated your account appropriately.

In each case, credit reference agencies are independent controllers of your personal data, and their own privacy notices will apply to their handling of your personal data. The three main credit reference agencies ("CRAs") in the UK (TransUnion, Equifax and Experian) have produced a Credit Reference Agency Information Notice which explains how these agencies use and share personal data which they receive about you. The identities of the CRAs, and the ways in which they use and share personal information, are explained in more detail at www.equifax.co.uk/crain.

- **Creditsafe**

Creditsafe Credit Reference and Affordability Checks

To help us assess applications, prevent fraud, and meet our legal and regulatory obligations, we may obtain information about you from the credit reference agency TransUnion. We obtain this information via **Creditsafe**, which uses its data partner **TransUnion** to supply consumer credit and identity data.

- **Creditsafe Business Solutions Limited** is authorised and regulated by the Financial Conduct Authority FCA Firm Reference Number: **742313**

- **TransUnion International UK Limited** is authorised and regulated by the Financial Conduct Authority FCA Firm Reference Number: **805757**

The information we receive may include data relating to your identity, credit commitments, payment history, and public record information. This data is used solely for legitimate business purposes, including creditworthiness assessment, identity verification, and fraud prevention, in accordance with applicable data protection laws.

Further information about how Creditsafe and TransUnion process your personal data can be found in their respective privacy notices:

- **Creditsafe Privacy / Transparency Notice**: Transparency Notice | Customers & Suppliers

- **TransUnion CRAIN (Credit Reference Agency Information Notice)**: https://www.transunion.co.uk/legal/privacy-centre/pc-credit-reference

- **TransUnion Bureau Privacy Notice**: https://www.transunion.co.uk/legal/privacy-centre/pc-bureau

- **Printers**

We may use professional printers to print the account statements, letters and other documents that we send to you from time to time and so we have to share with them the password protected information that needs to be printed into those statements, letters and documents that you receive.

- **Marketing Companies**

We use a cloud-based platform in order to send e-mail communication regarding our products and services to both our existing and prospective customers. Data is loaded directly from our system into the cloud-based platform via a secure API communication or secure file transfer method.

If you have told us that you do not wish to receive marketing information from us by e-mail then we will not send them any information about you and you will not receive these emails from them.

- **Survey Companies**

We may use the services of an online customer satisfaction survey company to gather your feedback and reviews about us. To enable them to send you the e-mail survey request, we provide them with your name and e-mail address and details of the

relevant products and services. If you have told us that you do not wish to receive marketing information from us by e-mail then we will not send them any information about you and you will not receive these emails from them.

- **Regulators**

We may share information about you with our regulators in order to meet our regulatory reporting obligations. We will only share the information about you with our regulators that is necessary to meet our legal and regulatory obligations.

- **Service Providers and Suppliers**

We may, from time to time, employ the services of third parties to help us provide our products and services to you or to help us meet our regulatory and reporting obligations and it may be necessary to provide them with some of your personal data in order for them to provide us with the required services. Examples of this could be, in relation to our car finance business, providing car registrations to third party valuers to provide us with up-to-date valuations or, in relation to our property finance business, providing address details to third party valuers to provide us with up-to-date valuations or providing access to IT service providers who assist us to ensure that our IT systems are safe and secure.

- **Legal Obligations**

We may be required to provide information about you where we are required to do so to meet a legal obligation, for example, where we are required to do so under a court order.

Please rest assured that we have quality checked all the third parties to whom we send your information and have appropriate contractual arrangements in place with them to make sure that they will only use the information for the purposes that we have sent it to them and that it will be properly protected.

- **Other Third Parties**

There may be occasions where we need to share elements of personal data with a third party who will require the data to undertake any due diligence. This activity will be carefully controlled and undertaken under our legitimate interests. An assessment will always be made as to whether the processing is necessary and doesn't override your rights and freedoms as a data subject.

8. How long we will store your personal data

We shall retain your personal information for the duration of our agreement with you and for the purposes of, complying with our legal obligations, or in our legitimate interests, as set out in the table in section 5 above, in accordance with data privacy laws and our retention policy.

9. Your rights to your personal data

We recognise that your information is your information - it does not belong to us. You have a number of important rights which put you in control of your information. To help you understand your rights, we will explain them below.

If you wish to exercise any of your rights, please send a written request to us using the contact details provided in section 2 above.

a. Your right of access to your personal data

You can ask us at any time to tell you what personal data we hold about you and we will do so, without undue delay, and in any event within one month of receipt of your request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. We will tell you of any such extension within one month of receipt of your request, together with the reasons for the delay. Where you make the request by electronic means, we will provide the information by electronic means where possible, unless otherwise requested by you.

We will not charge you any fee for providing this information or to exercise any of your other rights (unless the request is manifestly unfounded or excessive, in which case we may charge you a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested. Alternatively, we may be entitled to refuse the request). If you request more than one copy of the information, then we may charge you a reasonable fee for the administration of producing the additional copies.

We may ask you to provide us with information to verify your identity before providing you with the information requested.

b. Your right of rectification to your personal data

You have the right to have any personal data that we hold about you corrected if it is wrong or completed if it is incomplete. To have it corrected or completed, simply tell us what information is wrong or incomplete and give us the correct and complete information. We will update or complete it without undue delay. We may ask you to provide supporting evidence to verify the information you are giving to us for example, proof of address where you tell us that the address details we hold about you are wrong.

c. Your right of erasure of your personal data (also known as the right to be forgotten)

In some circumstances you have the right to have the personal data that we hold about you permanently erased. You will have this right (1) when it is no longer necessary for us to process your personal data or (2) if there is no legal basis for us to process your personal data or (3) if we unlawfully process your personal data or (4) to comply with a legal obligation to which we are subject. If you believe that any of these circumstances apply to you then please tell us and we will ensure that your personal data is permanently erased without undue delay if one of these circumstances do exist.

Where we permanently erase your personal data, we will also take reasonable steps to inform any third parties to whom we have provided your personal data of your request to have the personal data erased.

d. Your right to have processing of your personal data restricted

In some circumstances you have the right to have the processing of your personal data restricted. You will have this right

- if you tell us that your personal data is inaccurate, for a period enabling us to verify its accuracy; or
- if we are not processing your personal data lawfully and you tell us that you would rather have us restrict the processing than erase it; or
- we no longer need your personal data but you need us to store it because you need it for the establishment, exercise or defence of legal claims; or
- if you have objected to us processing your personal data, for a period enabling us to verify whether the legitimate grounds on which we are processing it override your grounds for objection.

This is not an absolute right, and your personal data may still be processed where certain grounds exist. This is:

- with your consent;
- for the establishment, exercise, or defence of legal claims;
- for the protection of the rights of another natural or legal person;
- for reasons of important public interest.

Only one of these grounds needs to be demonstrated to continue data processing.

We will consider and respond to requests we receive, including assessing the applicability of these exemptions.

We will tell you once a restriction on processing has been applied and before lifting any restriction.

Where we restrict the processing of your personal data we will also take reasonable steps to inform any third parties to whom we have provided your personal data of your request to have the personal data restricted.

e. Your right to object to the processing of your personal data

As explained in this Privacy Notice, we process your personal data because we have a legitimate interest in doing so. However, you have the right to object to us processing your personal data, on grounds relating to your particular situation. If you object then we will stop processing your personal data unless we can show compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims. For example, where we detect fraud it is unlikely that your objection may prevent us supplying that information to fraud prevention agencies and legal authorities. Another example is that it is unlikely that your objection may prevent us reporting to the regulator in relation to your account even if you object to us processing your personal data.

The only exception to this relates to where you have previously given consent to us to market to you and you change your mind and object to us using your personal data to market to you. In this case we will without undue delay stop marketing to you and we will take your objection as a withdrawal of that consent and we will update your marketing preferences.

f. Your right to data portability

You have the right to receive personal data that you have provided to us, in a structured, commonly used and machine readable format. You can also ask us to transfer that data to a third party. This right only applies when our lawful basis for processing your personal data is consent or performance of a contract, and we are carrying out processing by automated means.

g. Your right not to be subject to automated decision making and profiling

You have the right not to be subject to a decision based solely on automated processing. We do not make any decisions based solely on automated processing.

h. Your right to withdraw consent

Where we are relying on consent to process your personal data, you have the right to withdraw that consent at any time. This will not affect the lawfulness of any processing carried out before you withdraw your consent.

If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

You can ask us to stop sending you marketing messages at any time by following the “unsubscribe” (or similar) links on any marketing message sent to you or by contacting us at any time. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a purchase, product/service experience or other transactions.

i. Your right to complain to the Information Commissioner

If you are not satisfied with the way that we have processed your personal data or the way that we have dealt with you when exercising any of your rights, then you may follow our complaints procedure by contacting us directly on 01604 761276 or sending an email to complaints@portmanfinancegroup.co.uk

https://www.portmanfinancegroup.co.uk

You may also refer your concerns to the Information Commissioner's Office (or ICO), the body that regulates the handling of personal data in the UK. You can contact them by:

1. Phone on 03031 231113

2. Writing to them at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 SAF

3. Going to their website at www.ico.org.uk

Portman Company	ICO Reference Number
Portman Business Finance Limited	ZB549803
Portman Asset Finance Limited	Z9881012
Portman Financial Services Limited	ZB498100
Portman Leasing Limited	Z1826630
Portman Commercial Finance Limited	ZA633670
Portman Operations Limited	ZB378277

10. Important information for children

We do not offer products or services to children - i.e. anyone under the age of 18. However we may collect and process information about children when it is necessary and incidental to the provision of our products and services. Examples of this include where children are beneficial owners of a company which is our customer and in these circumstances, we process the child's personal data so that we can properly understand who is our customer and meet our combating financial crime obligations.

We will not send marketing information to children.

If you are a child whose personal data we hold then please be aware that this Privacy Notice also relates to you and you should read it so that you understand how we process your personal data.

Please note that children have the same rights to their personal data, as explained in this Privacy Notice, as an adult.

11. Other websites and links

Our website may contain links to other websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control third party websites and are not responsible for their privacy notices or for the content, accuracy or opinions express in such websites. We do not investigate, monitor or check third party websites for accuracy or completeness and the inclusion of any linked website on or through our website does not imply approval or endorsement by us of the linked website.

If you decide to leave our website and access these third-party websites, plug-ins and/or applications you do so at your own risk. We encourage you to read the privacy notice of every website you visit.

12. Fraud prevention agencies

- **General**

Before we provide services, goods or financing to you, we may undertake checks for the purposes of preventing fraud and money laundering, and to verify your identity. These checks require us to process personal data about you.

The personal data you have provided, we have collected from you, or we have received from third parties will be used to prevent fraud and money laundering, and to verify your identity.

Details of the personal information that will be processed, for example: name, address, date of birth, address, contact details, financial information, employment details, device identifiers including IP address and vehicle details.

We and fraud prevention agencies may also enable law enforcement agencies to access and use your personal data to detect, investigate and prevent crime.

We process your personal data on the basis that we have a legitimate interest in preventing fraud and money laundering, and to verify identity, in order to protect our business and to comply with laws that apply to us. Such processing is also a contractual requirement of the services or financing you have requested.

Fraud prevention agencies can hold your personal data for different periods of time, and if you are considered to pose a fraud or money laundering risk, your data can be held for up to six years.

- **Consequences of Processing**

If we, or a fraud prevention agency, determine that you pose a fraud or money laundering risk, we may refuse to provide the services and financing you have requested, or to employ you, or we may stop providing existing services to you.

A record of any fraud or money laundering risk will be retained by the fraud prevention agencies, and may result in others refusing to provide services, financing or employment to you. If you have any questions about this, please contact us on the details provided.

- **Data transfers**

Fraud prevention agencies may allow the transfer of your personal data outside of the UK. This may be to a country where the UK Government has decided that your data will be protected to UK standards, but if the transfer is to another type of country, then the fraud prevention agencies will ensure your data continues to be protected by ensuring appropriate safeguards are in place.

- **Your rights**

Your personal data is protected by legal rights, as set out in section 9 above, which include your rights to object to our processing of your personal data; request that your personal data is erased or corrected; request access to your personal data.

SCHEDULE 1 – PRIVACY NOTICE

For more information or to exercise your data protection rights, please contact us using the contact details provided in section 2 above.

You also have a right to complain to the Information Commissioner's Office which regulates the processing of personal data, as set out in this Privacy Notice.

13. Changes to this Privacy Notice

This Privacy Notice was last updated on 06/10/2026