

# Subpostmaster Limited

## Privacy Notice

### Subpostmaster Limited - Privacy Notice

#### Who we are

Subpostmaster Limited are Commercial Finance Broker based in South Wales. We act as a broker for our customers. Subpostmaster Limited are Authorised and Regulated by the Financial Conduct Authority. FRN 828083

#### How we will use the information about you

Here at Subpostmaster Ltd 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. for statistical analysis,
5. credit reference checks,
6. completion of Post Office Ltd applications

We may share your information with, and obtain information about you from, credit reference agencies or fraud prevention agencies.

We will not disclose your information to any company outside of Subpostmaster Ltd and approved lenders, except to help prevent fraud or if required by law to do so.

For further information on how your information is used, how we maintain the security of your information and your rights to access/alter and change information we hold on you, please contact [support@subpostmaster.com](mailto:support@subpostmaster.com)

From time to time we would like to contact you with details of other new or existing Subpostmaster Ltd services we provide. If you consent to us contacting you for this purpose, please tick to say how you would like us to contact you.

- ☐ Post
- ☐ Email
- ☐ Phone
- ☐ Text

## Your Personal Data:

### What we need

Subpostmaster Ltd will be what is known as the processor of the personal data you provide to us. We collect personal data plus new and existing business data about you.

### We also gather

Name, address, email address, contact details, personal income and expenditure details, spouse/partner details (if applicable) financial status, criminal history data and any other information required by the Post Office franchise application process.

### Why we need it

We need to know your basic personal data and certain business data, to provide you with an accurate recommendation for your personal circumstances and (or) to ensure compliance to all Post Office franchise application criteria. We will not collect any excess personal data from you.

For processing of data to be lawful under GDPR Subpostmaster Ltd use -

- (a) Consent: The individual has given clear consent for us to process their personal data for a specific purpose.
- (b) Contract: The processing is necessary for an order we have with the individual, or because they have asked us to take specific steps before entering an order/customer request.

### What we do with it

Automated Decision Making:

Subpostmaster Ltd will pass your data captured to lenders/funders/banks 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.

You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or any significant affects. You can request human intervention and challenge a decision made this way by contacting Subpostmaster Ltd.

All the personal data we use is controlled by Subpostmaster Ltd 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. More information on this framework can be found at [www.subpostmaster.com](http://www.subpostmaster.com)

We may pass your data to enders/funders/banks 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 Consumer Credit Act 1974, section 159, to keep your basic personal data, such as name, address, contact details, loan/mortgage quote/offer letters, conversation records, signed privacy notice, letters of instruction/purchase orders for a period of 6 years, after which time it will be destroyed.

All data relating purely to a Post Office Ltd franchise application will be retained for a maximum of 3 months, after which time it will be destroyed.

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 Mr David Shord and you can contact him at [support@subpostmaster.com](mailto:support@subpostmaster.com). Please mark the subject box, for the attention of Mr David Shord along with Data Protection Query or by writing to our registered office address.

We will share your details only with relevant organisations such as lenders/funders/banks and/or Post Office Ltd (if you are applying for a Post Office Franchise), so that they can process your information, allowing Subpostmaster Ltd to offer suitable and sustainable products that they provide. By engaging our services, you consent to us passing your details for the purposes within the notice.