
PRIVACY POLICY

BACKGROUND:

Elite Business Funding Ltd understands that your privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone who visits this website, www.elitebusinessfunding.co.uk (“Our Site”) and will only collect and use personal data in ways that are described here, and in a manner that is consistent with Our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. You will be required to read and accept this Privacy Policy when signing up for an Account. If you do not accept and agree with this Privacy Policy, you must stop using Our Site immediately.

1. Definitions and Interpretation

In this Policy, the following terms shall have the following meanings:

“Account”	means an account required to access and/or use certain areas and features of Our Site;
“Cookie”	means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in section 13, below;
“Cookie Law”	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;
“personal data”	means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to Us via Our Site. This definition shall, where applicable, incorporate the definitions provided in the EU Regulation 2016/679 – the General Data Protection Regulation (“GDPR”); and
“We/Us/Our”	means Elite Business Funding Ltd, a limited company registered in England under company number 11133705, whose registered address is The Coach House, The Square, Sawbridgeworth, Hertfordshire, CM21 9AE, and whose main trading address is 114 New London Road, Chelmsford, Essex, CM2 0RG.

2. Information About Us

- 2.1 Our Site is owned and operated by Freelance SEO, a limited company registered in England under company number 08376213, whose registered address is The Old Brewery 47 Church Street, Great Baddow, Chelmsford, Essex, CM2 7JA.
- 2.2 Our Data Protection Officer is Charles Groves, and can be contacted by email at cgroves@elitebusinessfunding.co.uk, by telephone on 0203 473 3653, or by

post at 114 New London Road, Chelmsford, Essex, CM2 0RG.

2.3 We are regulated by the Financial Conduct Authority (FCA) and our FRN is 808112

3. **What Does This Policy Cover?**

This Privacy Policy applies only to your use of Our Site. Our Site may contain links to other websites. Please note that We have no control over how your data is collected, stored, or used by other websites and We advise you to check the privacy policies of any such websites before providing any data to them.

4. **Your Rights**

4.1 As a data subject, you have the following rights under the GDPR, which this Policy and Our use of personal data have been designed to uphold:

4.1.1 The right to be informed about Our collection and use of personal data;

4.1.2 The right of access to the personal data We hold about you (see section 12);

4.1.3 The right to rectification if any personal data We hold about you is inaccurate or incomplete (please contact Us using the details in section 14);

4.1.4 The right to be forgotten – i.e. the right to ask Us to delete any personal data We hold about you (We only hold your personal data for a limited time, as explained in section 6 but if you would like Us to delete it sooner, please contact Us using the details in section 14);

4.1.5 The right to restrict (i.e. prevent) the processing of your personal data;

4.1.6 The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);

4.1.7 The right to object to Us using your personal data for particular purposes; and

4.1.8 Rights with respect to automated decision making and profiling.

4.2 If you have any cause for complaint about Our use of your personal data, please contact Us using the details provided in section 14 and We will do Our best to solve the problem for you. If We are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office.

4.3 For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau.

5. **What Data Do We Collect?**

Depending upon your use of Our Site, We may collect some or all of the following personal and non-personal data (please also see section 13 on Our use of Cookies and similar technologies.

5.1 name;

5.2 date of birth;

5.3 gender;

- 5.4 passport;
- 5.5 business/company name and information;
- 5.6 job title;
- 5.7 profession;
- 5.8 contact information such as email addresses and telephone numbers;
- 5.9 demographic information such as post code, preferences, and interests;
- 5.10 financial information such as credit / debit card numbers;
- 5.11 credit history;
- 5.12 IP address;

6. **How Do We Use Your Data?**

- 6.1 All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with Our obligations and safeguard your rights under the GDPR at all times. For more details on security see section 7, below.
- 6.2 Our use of your personal data will always have a lawful basis, either because it is necessary for Our performance of a contract with you, because you have consented to Our use of your personal data (e.g. by subscribing to emails), or because it is in Our legitimate interests. Specifically, We may use your data for the following purposes:
 - 6.2.1 Providing and managing your Account;
 - 6.2.2 Providing and managing your access to Our Site;
 - 6.2.3 Personalising and tailoring your experience on Our Site;
 - 6.2.4 Supplying Our services to you (please note that We require your personal data in order to enter into a contract with you);
 - 6.2.5 Personalising and tailoring Our services for you;
 - 6.2.6 Replying to emails from you;
 - 6.2.7 Supplying you with emails that you have opted into (you may unsubscribe or opt-out at any time by emailing info@elitebusinessfunding.co.uk);
 - 6.2.8 Market research;
 - 6.2.9 Analysing your use of Our Site and gathering feedback to enable Us to continually improve Our Site and your user experience;
- 6.3 With your permission and/or where permitted by law, We may also use your data for marketing purposes which may include contacting you by email, telephone or post with information, news and offers on Our services. We will not, however, send you any unsolicited and unrelated marketing or spam material and will take all reasonable steps to ensure that We fully protect your rights and comply with Our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003.
- 6.4 Third parties whose content appears on Our Site may use third party Cookies, as detailed below in section 13. Please refer to section 13 for more information on controlling Cookies. Please note that We do not control the activities of such third parties, nor the data they collect and use and advise you to check

the privacy policies of any such third parties.

- 6.5 You have the right to withdraw your consent to Us using your personal data at any time, and to request that We delete it.
- 6.6 We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Data will therefore be retained for the following periods (or its retention will be determined on the following bases):

Data Ref.	Type of Data	Purpose of Data	Review Period	Retention Period or Criteria	Comments
1	Personal information (Name, address etc)	Funding application. To verify details.	Annually	6 years	To assist client during any loan term or for assisting with further finance enquiries and for any complaints and disputes regarding any service provided.
2	Business information (Registered No., address)	Funding application. To verify details.	Annually	6 years	To assist client during any loan term or for assisting with further finance enquiries and for any complaints and disputes regarding any service provided.
3	Bank statements	To support funding application and act as proof of affordability and to provide evidence against specified criteria.	Annually	6 years after funding has been provided	A 6 year period has been allowed prior to disposal of information in the event of any complaints or claims made by the customer which can be made within this timescale to fall in line with our regulator and PI Insurance.
4	Credit history	To support funding application and act as proof of affordability and to provide evidence against specified criteria.	Annually	6 years months after funding has been provided	A 6 year period has been allowed prior to disposal of information in the event of any complaints or claims made by the customer which can be made within this timescale to fall in line with our regulator and PI Insurance.
5	Credit card statements	To support funding application and act as proof of affordability and to provide evidence against specified criteria.	Annually	6 years after funding has been provided	A 6 year period has been allowed prior to disposal of information in the event of any complaints or claims made by the customer which can be made within this timescale to fall in line with our regulator and PI Insurance.
6	Annual business statements	To support funding application and act as proof of affordability and to provide evidence against specified criteria.	Annually	6 years after funding has been provided	A 6 year period has been allowed prior to disposal of information in the event of any complaints or claims made by the customer which can be made within this timescale to fall in line with our regulator and PI Insurance.
7	Passports	To support funding application and act as proof of affordability and to provide evidence against specified	Annually	6 years after funding has been provided	A 6 year period has been allowed prior to disposal of information in the event of any complaints or claims made by the customer which can be made within this timescale to fall in line with our regulator and PI

		criteria.			Insurance.
8	Personal certificates (Birth/Death, Marriage/Divorce)	To support funding application and act as proof of affordability and to provide evidence against specified criteria.	Annually	6 years after funding has been provided	A 6 year period has been allowed prior to disposal of information in the event of any complaints or claims made by the customer which can be made within this timescale to fall in line with our regulator and PI Insurance.
9	Property records (mortgage statements, lease agreements)	To support funding application and act as proof of affordability and to provide evidence against specified criteria.	Annually	6 years after funding has been provided	A 6 year period has been allowed prior to disposal of information in the event of any complaints or claims made by the customer which can be made within this timescale to fall in line with our regulator and PI Insurance.
10	Pay statements	To support funding application and act as proof of affordability and to provide evidence against specified criteria.	Annually	6 years after funding has been provided	A 6 year period has been allowed prior to disposal of information in the event of any complaints or claims made by the customer which can be made within this timescale to fall in line with our regulator and PI Insurance.
11	HMRC information	To support funding application and act as proof of affordability and to provide evidence against specified criteria.	Annually	6 years after funding has been provided	A 6 year period has been allowed prior to disposal of information in the event of any complaints or claims made by the customer which can be made within this timescale to fall in line with our regulator and PI Insurance.
12	Business contracts	To support funding application and act as proof of affordability and to provide evidence against specified criteria.	Annually	6 years after funding has been provided	A 6 year period has been allowed prior to disposal of information in the event of any complaints or claims made by the customer which can be made within this timescale to fall in line with our regulator and PI Insurance.
13	Existing Loan agreements	To support funding application and act as proof of affordability and to provide evidence against specified criteria.	Annually	6 years after funding has been provided	A 6 year period has been allowed prior to disposal of information in the event of any complaints or claims made by the customer which can be made within this timescale to fall in line with our regulator and PI Insurance.
14	Tax Returns	To support funding application, act as proof of affordability, calculate risk so the lender can review for approval/decline and offer.	Annually	6 years after funding has been provided	A 6 year period has been allowed prior to disposal of information in the event of any complaints or claims made by the customer which can be made within this timescale to fall in line with our regulator and PI Insurance.
15	Franchise Agreements	To support funding application, act as proof of affordability, calculate risk so the lender can review	Annually	6 years after funding has been provided	A 6 year period has been allowed prior to disposal of information in the event of any complaints or claims made by the customer which can be made within this timescale to fall in line with our regulator and PI

		for approval/decline and offer.			Insurance.
16	Lease agreements	To support funding application, act as proof of affordability, calculate risk so the lender can review for approval/decline and offer.	Annually	6 years after funding has been provided	A 6 year period has been allowed prior to disposal of information in the event of any complaints or claims made by the customer which can be made within this timescale to fall in line with our regulator and PI Insurance.
17	Purchase orders/Invoices	To support funding application, act as proof of affordability, calculate risk so the lender can review for approval/decline and offer.	Annually	6 years after funding has been provided	A 6 year period has been allowed prior to disposal of information in the event of any complaints or claims made by the customer which can be made within this timescale to fall in line with our regulator and PI Insurance.

7. How and Where Do We Store Your Data?

- 7.1 We only keep your personal data for as long as We need to in order to use it as described above in section 6, and/or for as long as We have your permission to keep it.
- 7.2 Your data will only be stored in the UK.
- 7.3 Data security is very important to Us, and to protect your data We have taken suitable measures to safeguard and secure data collected through Our Site.
- 7.4 Steps We take to secure and protect your data include:
 - a) All electronic copies of personal data are stored securely using passwords and Microsoft OneDrive data encryption;
 - b) All hardcopies of personal data, along with any electronic copies are stored on physical, removable media should be stored securely in a locked box, drawer, cabinet, or similar;
 - c) All personal data stored electronically is backed up weekly with backups stored onsite. All backups should be encrypted Microsoft OneDrive; and
 - d) No personal data is transferred to any device personally belonging to an employee and personal data may only be transferred to devices belonging to agents, contractors, or other parties working on behalf of the Company where the party in question has agreed to comply fully with the letter and spirit of this Policy and of the GDPR (which may include demonstrating to the Company that all suitable technical and organisational measures have been taken).

8. Do We Share Your Data?

- 8.1 We may share your data with other companies for the purpose of obtaining your business funding. This includes commercial lenders and business loan companies.
- 8.2 We may sometimes contract with third parties to supply products and services

to you on Our behalf. These may include payment processing, delivery of goods, search engine facilities, advertising, and marketing. In some cases, the third parties may require access to some or all of your data. Where any of your data is required for such a purpose, We will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, Our obligations, and the obligations of the third party under the law.

- 8.3 We may compile statistics about the use of Our Site including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you. We may from time to time share such data with third parties such as prospective investors, affiliates, partners, and advertisers. Data will only be shared and used within the bounds of the law.
- 8.4 We may sometimes use third party data processors that are located outside of the European Economic Area (“the EEA”) (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein). Where We transfer any personal data outside the EEA, We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under the GDPR.
- 8.5 In certain circumstances, We may be legally required to share certain data held by Us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with legal requirements, a court order, or a governmental authority.

9. **What Happens If Our Business Changes Hands?**

- 9.1 We may, from time to time, expand or reduce Our business and this may involve the sale and/or the transfer of control of all or part of Our business. Any personal data that you have provided will, where it is relevant to any part of Our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use that data only for the same purposes for which it was originally collected by Us.
- 9.2 In the event that any of your data is to be transferred in such a manner, you will be contacted in advance and informed of the changes. When contacted you will be given the choice to have your data deleted or withheld from the new owner or controller.

10. **How Can You Control Your Data?**

- 10.1 In addition to your rights under the GDPR, set out in section 4, when you submit personal data via Our Site, you may be given options to restrict Our use of your data. In particular, We aim to give you strong controls on Our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from Us which you may do by unsubscribing using the links provided in Our emails and at the point of providing your details).
- 10.2 You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service (“the TPS”), the Corporate Telephone Preference Service (“the CTPS”), and the Mailing

Preference Service (“the MPS”). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

11. **Your Right to Withhold Information**

11.1 You may access certain areas of Our Site without providing any data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.

11.2 You may restrict Our use of Cookies. For more information, see section 13.

12. **How Can You Access Your Data?**

You have the right to ask for a copy of any of your personal data held by Us (where such data is held). Under the GDPR, no fee is payable and We will provide any and all information in response to your request free of charge. Please contact Us for more details at info@elitebusinessfunding.co.uk, or using the contact details below in section 14. Alternatively upon request we can also send you our Data Protection Policy for more information.

13. **Our Use of Cookies**

13.1 We use cookies to track your use of our website. This enables us to understand how you use the site and track any patterns with regards how you are using our website. This helps us to develop and improve our website in response to what you might need or want.

13.2 Cookies are either:

- a) Session cookies: these are only stored on your computer during your web session and are automatically deleted when you close your browser – they usually store an anonymous session ID allowing you to browse a website without having to log in to each page, but they do not collect any personal data from your computer; or
- b) Persistent cookies: a persistent cookie is stored as a file on your computer and it remains there when you close your web browser. The cookie can be read by the website that created it when you visit that website again. At Chez Vision Marketing we use persistent cookies for Google Analytics.

13.3 Cookies can also be categorised as follows:

- a) Strictly necessary cookies: These cookies are essential to enable you to use the website effectively, such as when buying a product and / or service, and therefore cannot be turned off. Without these cookies, the services available to you on our website cannot be provided. These cookies do not gather information about you that could be used for marketing or remembering where you have been on the internet.
- b) Performance cookies: These cookies enable us to monitor and improve the performance of our website. For example, they allow us to count visits, identify

traffic sources and see which parts of the site are most popular.

- c) **Functionality cookies:** These cookies allow our website to remember choices you make and provide enhanced features. For instance, we may be able to provide you with news or updates relevant to the services you use. They may also be used to provide services you have requested such as viewing a video or commenting on a blog. The information these cookies collect is usually anonymised.
- 13.4 **Third parties or publicly available sources:** We may receive personal data about you from various third parties and public sources, for example:
- a) Analytics and search information providers
 - b) Advertising platforms
 - c) Providers of technical, payment and delivery services
 - d) Data brokers or aggregators
 - e) Companies House
 - f) The Electoral Register
- 13.5 **Other Data Controllers or Processors:** When our client is a data controller or data processor of your data (and so we are a processor or sub-processor, respectively), we may be provided your data in order to fulfil our contract with our client. We do not take responsibility for the privacy standards of our client, but endeavour to ensure they meet with the legal minimum. In any event, our standards of privacy will apply to your data whether we have obtained information directly from you or from a controller client.
- 13.6 **All Cookies used by and on Our Site** are used in accordance with current Cookie Law.
- 13.7 In addition to the controls that We provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third-party Cookies. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.
- 13.8 You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.
- 13.9 It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

14. **Contacting Us**

If you have any questions about Our Site or this Privacy Policy, please contact Us by email at info@elitebusinessfunding.co.uk, by telephone on 0203 473 3653, or by post at 114 New London Road, Chelmsford, Essex, CM2 0RG. Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you (as under section 12, above).

15. **Changes to Our Privacy Policy**

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.