

# DATA PROTECTION STATEMENT

## Purpose of this Data Protection Statement

As part of our arrangement with you, Commercial Expert Ltd ("Commercial Expert", "we", "us", or "our") has certain obligations under the General Data Protection Regulations ("GDPR"). This Statement is to give you an overview of how we look after your personal data and tells you about your privacy rights and how the law protects you. **This Statement is supplemental to our Data Protection Privacy Policy which is available on our website at [www.commercialexpert.co.uk/privacy-policy](http://www.commercialexpert.co.uk/privacy-policy)** It is important you read our full Data Protection Privacy Policy so that you are fully aware of how and why we are using personal data.

Commercial Expert is the data controller and responsible for your personal data. Our Data Privacy Manager, Michael Coates, is responsible for overseeing questions in relation to this Statement. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

### 1. The data we collect about you

We may collect, use, store and transfer different kinds of personal data about you including:

- Title
- Name
- Date of birth
- Nationality
- Address
- Telephone number and other contact details
- Job title
- Gender
- Ethnicity
- Marital status
- Details about the funding you require
- Serviceability data
- Introducer details, including their name and contact details
- Information about your business
- Bank account and other financial details.

A full list of the personal data we collect, use, store and transfer is available from our Data Protection Policy.

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 provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

## **2. How is your personal data collected and how we use your personal data**

Your personal data is collected throughout the arrangement we have with you. 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:

- Where we need to perform the contract we are about to enter into or have entered into with you. Our contract constitutes our Agreement together with its terms and conditions.
- 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.
- When we have consent to do so.

## **3. Purposes for which we will use your personal data**

To administer our broker services and related marketing activities, to ultimately be able to provide you with your bespoke indicative terms for funding, suitability letter, associated advice, and ultimately a suitable funding arrangement on your behalf. Please see our full Data Protection Policy which sets out in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. Your personal data will be made available to responsible management, HR, accounting, audit, compliance, IT and other corporate staff.

## **4. Disclosures of your personal data**

We may have to share your personal data with third parties throughout the course of our arrangement such as Credit Agencies, the Internet and HM Land Registry. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions. If we transfer your personal data outside of the EEA we will ensure a similar degree of protection. Further information on the disclosure of your personal data and international transfers is available on our full Data Protection Privacy Policy.

## **5. Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

## **6. Data Retention**

### **How long will you use my personal data for?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Further information regarding our retention periods is available on our full Data Protection Privacy Policy.

## **7. Your legal rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data including: request access, request correction, request erasure, object to process, restrict processing, request transfer and to withdraw consent. Further information is available on our full Data Protection Privacy Policy. If you wish to exercise any of the rights set out above, please contact us at [info@commercialexpert.co.uk](mailto:info@commercialexpert.co.uk). You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may

charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

## **8. Marketing**

We may wish to provide you with information about new products, services, promotions and other information in which we think you may be interested. You can ask us or third parties to stop sending you marketing messages at any time by emailing [info@commercialexpert.co.uk](mailto:info@commercialexpert.co.uk) or by writing to our Data Protection Manager, Michael Coates, at Commercial Expert Ltd Unit 24a Parsons Court Welbury Way Aycliffe Business Park Newton Aycliffe DL5 6ZE.

**Commercial Expert will process your personal data with reliance upon the legal conditions for processing detailed in section 2 of this Statement.**