

# PRIVACY POLICY

Boundary Finance ("We") are committed to protecting and respecting your privacy.

This privacy policy, together with any other documents referred to on it, explains how the 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. By visiting our website, you are accepting and consenting to the practices described in this policy.

Our website and our services are not intended for children and we do not knowingly collect data relating to children.

## WHO WE ARE AND HOW TO CONTACT US

Boundary Finance is the data controller and is responsible for your personal data

Postal Address: .....

- Email: [info@boundaryfinance.com](mailto:info@boundaryfinance.com)  
Telephone number:
- If you have any questions about this privacy policy or how we deal with your personal data, including any requests to exercise your legal rights, please contact us using the details above.

## WHAT INFORMATION DO WE COLLECT FROM YOU?

The types of personal data we collect and process may include the following:

- Identity information, such as your name,
- Contact information, such as your address, e-mail address and phone number,
- Financial information, such as bank account details for payment purposes
- Technical information, such as your Internet protocol (IP) address, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- Information about how you use our website, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page.

- Marketing information, such as your preferences in receiving marketing from us and your communication preferences

We do not knowingly collect 'special category' personal data. This is a special type of sensitive data to which more stringent processing conditions apply, and comprises data concerning your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life or sexual orientation and genetic data and / or biometric data.

Where we need to collect your 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.

### 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.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

### HOW DO WE COLLECT YOUR PERSONAL DATA?

We obtain personal data about you in a variety of ways, including when you:

- Fill out a form on our website [www.boundaryfinance.com](http://www.boundaryfinance.com)
- ask us to provide you with our services
- contact us over the phone, via email or face-to-face
- enter any competitions or take part in any surveys we might run

We also use automated technologies. When you interact with our website, we may automatically collect Usage Data and Technical Data

### HOW DO WE USE YOUR PERSONAL DATA?

We will only use your personal data when the law allows us to. Most commonly we will use one or more of the following as our lawful basis for using your personal data:

Contractual necessity:

this means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Legitimate Interest:

this means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do 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.

Comply with a legal or regulatory obligation:

this means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to. Information you give to us.

Consent – If you have never used our services but have given us your explicit consent to hear from us about our services, promotions or events that we consider may be of interest to you, we will contact you by email. You have the right to withdraw your consent to marketing at any time either by contacting us using one of the methods detailed in the contact section or by clicking on the unsubscribe link at the bottom of every marketing email we send.

Purposes for which we will use your personal data

We have set out below, a description of all the ways we use your personal data, with the legal basis we rely on to do so.

- to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;

- (contractual necessity) to provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;
- (legitimate interest) to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you. If you are an existing customer, we will only contact you by electronic means (e-mail or SMS) with information about goods and services similar to those which were the subject of a previous sale or negotiations of a sale to you. If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this. If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please contact us
- (legitimate interest) to notify you about changes to our service
- (legal obligation) to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- (legitimate interest) to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
- (legitimate interest) to allow you to participate in interactive features of our service, when you choose to do so;
- (legitimate interest) as part of our efforts to keep our site safe and secure;
- (legitimate interest, legal obligation) to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.
- (legitimate interest)

### SHARING YOUR PERSONAL DATA

We may share your personal data with the following parties for the purposes set out in this policy:

- business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
- email and mail service providers such as, MailChimp who we may use for sending emails campaigns;
- analytics and search engine providers that assist us in the improvement and optimisation of our site;
- technical and support partners, such as companies who host our website and who provide technical support;

- credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.

We may also disclose your personal information to third parties under the following circumstances:

- In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.
- If Acorn Business Finance or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation; or to protect the rights, property, or safety of Boundary Finance our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

#### WHERE WE STORE YOUR PERSONAL DATA

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. This includes staff engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

All information you provide to us is stored on our secure servers.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

#### DATA RETENTION

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.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

At the end of the retention period we will either delete your data completely or in some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

### YOUR INFORMATION RIGHTS

Under the UK data protection laws, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;
- The right to withdraw your consent to the processing at any time, where consent was the lawful basis for processing your data;
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller (known as the right to data portability), where applicable, i.e. where our processing is based on consent or is necessary for the performance of our contract with you or where we process your data by automated means);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to our processing of personal data, where applicable i.e. where processing is based on our legitimate interests (or in performance of a task in the public interest/exercise of official authority); direct marketing or processing for the purposes of scientific/historical research and statistics).
- If you wish to exercise any of the rights set out above, please contact [info@boundaryfinance.com](mailto:info@boundaryfinance.com)

## ACCESS TO INFORMATION

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.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or if you have made a number of requests. In this case, we will notify you and keep you updated.

## CHANGES TO OUR PRIVACY POLICY

Any changes we make to our privacy policy in the future will be posted on this page. Please check back frequently to see any updates or changes to our privacy policy.

This privacy policy was last updated on 8<sup>th</sup> January 2024

## COMPLAINTS

We hope that you will be satisfied with the way in which we approach and use your personal data.

Should you find it necessary, you have a right to raise a concern with the information regulator, the Information Commissioner's Office:

<https://ico.org.uk/>.

However, we do hope that if you have a complaint about the way we handle your personal data, you will contact us in the first instance using the contact details in section 1 above, so that we have an opportunity to resolve it.