

This policy was last updated on 25 May 2018.

As a customer and or potential customer of Asegun Limited, there are many ways you can use the services we offer, some of which require you to share your personal data with us. In these instances, we act as the data controller, making us responsible for deciding the purpose and means for dealing with your personal data.

Asegun Limited is committed to the privacy of your personal data.

Our privacy policy explains:

- what personal data we collect about you in the course of your engagement with our services, why we collect it, who it goes to and how long we keep it
- how we use your personal data
- how we protect your personal data
- your legal rights in respect of your personal data, including how to access and update the information we hold about you.

You can navigate to the relevant sections of the policy by clicking the links in the sidebar.

By continuing to use our services, you agree to our use of your personal data on the terms outlined in this policy.

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What is the purpose of this privacy notice?

This privacy notice aims to give you information on how we collect and process your personal data through your use of this website, including any data you may provide through this website when you [contact us for initial enquiries and subsequently used to manage your account should you wish to take up any of our services].

This website is not intended for children and we do not knowingly collect data relating to children.

You must read this privacy notice together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Third-party links outside of our control

This website may include links to third-party 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 these third-party websites and are not responsible for their privacy statements.

When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. THE PERSONAL DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. You can find out more about personal data from the [Information Commissioners Office](#).

Whether or not you become a customer, we'll use your personal data for the reasons set out below and if you become a customer we'll use it to manage the service you've applied for. In general, you provide your personal data to us directly, when you communicate with us through various channels, such as our website, phone, email or face-to-face meetings with our representatives. The personal data we use may include:

- Full name and personal details including contact information (e.g. home address and address history, email address, home, work and mobile telephone numbers);
- Date of birth and/or age (e.g. to make sure that you're eligible to apply);
- Financial details (e.g. salary and details of other income, and details of accounts held with other providers);
- Family, lifestyle or social circumstances if relevant to the product or service (e.g. the number of dependants you have);
- Personal data about other named applicants. You must have their authority to provide their personal data to us and share this data protection statement with them beforehand together with details of what you've agreed on their behalf.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal 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.

Monitoring of communications

Subject to applicable laws, we'll monitor and archive your emails, text messages and other communications in relation to your dealings with us. We'll do this for regulatory compliance, self-regulatory practices, crime prevention and detection, to protect the security of our communications systems and procedures, to check for obscene or profane content, for quality control and staff training, and when we need to see a record of what's been said. We may also monitor activities on your account where necessary for these reasons and this is justified by our legitimate interests or our legal obligations.

3. HOW WE USE 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:

- **Performance of Contract** 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).
- **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.
- **request transfer of your personal data to you or a third.** You can request that we transfer your data in a suitably accessible format to you and or a third party, where the data was provided with your consent.

You're free at any time to change your mind and withdraw your consent. The consequence might be that we can't do certain things for you.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

4. WHO WE SHARE YOUR PERSONAL DATA WITH

Subject to applicable data protection law we may share your personal data with:

Sub-contractors and other persons who help us provide our products and services;

Companies and other persons providing services to us;

Our legal and other professional advisors, including our auditors;

Fraud prevention agencies, credit reference agencies, and debt collection agencies when we open your account and periodically during your account or service management;

Other organisations who use shared databases for income verification and affordability checks and to manage/collect arrears;

Government bodies and agencies in the UK and overseas (e.g. Companies House, HMRC who may in turn share it with relevant overseas tax authorities and with regulators (e.g. the Financial Conduct Authority, the Information Commissioner's Office));

Courts, to comply with legal requirements, and for the administration of justice;

In an emergency or to otherwise protect your vital interests;

To protect the security or integrity of our business operations;

To other parties connected with your account e.g. guarantors and other people named on the application including joint account holders who will see your transactions;

When we restructure or sell our business or its assets or have a merger or re-organisation;

Anyone else where we have your consent or as required by law.

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. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

6. 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.

By law we must keep basic information about our customers (INCLUDING CONTACT, IDENTITY, FINANCIAL AND TRANSACTION DATA) FOR [SIX] YEARS AFTER THEY CEASE BEING CUSTOMERS FOR [TAX] PURPOSES.]

In some circumstances you can ask us to delete your data: see **Your legal rights** below for further information.

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.

7. YOUR LEGAL RIGHTS

Unless subject to an exemption under the 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).

No fee required – with some exceptions

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

What we may need from you

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.

Time limit to respond

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 you have made a number of requests. In this case, we will notify you and keep you updated.

8. CHANGES TO THIS NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

We reserve the right to make changes to or update the terms of this policy from time to time. If there are any significant changes made to the policy, we'll let you know.

Please keep us informed if your personal data changes during your relationship with us. It is important that the personal data we hold about you is accurate and current.

9. QUERIES, REQUESTS OR CONCERNS

If you have any queries related to this privacy policy, including requests to access or modify the use of your personal data, please [contact us](#)

If you are not satisfied after we've tried to resolve your issue, you'll be entitled to lodge a complaint with the Information Commissioner's Office (ICO). Please see the ICO website for further details: www.ico.org.uk.