

IN-SYNC FINANCE LTD. (“We”) (company number **12333796**) are committed to protecting and respecting your privacy. This policy (together with our *Terms of Business* and any other documents referred to on our website www.insyncfinance.co.uk) sets out the basis on which any 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 providing personal data to us, you are accepting and consenting to the practices described in this policy.

For the purpose of the Data Protection Act 1998 (the Act), Regulation (EU) 2016/679 (General Data Protection Regulation) and Privacy and Electronic Communications Regulations (PECR), the data controller is **IN-SYNC FINANCE LTD.** of 7 Crown Meadow, Kenninghall, Norwich, NR16 2FE. Our nominated representative for the purpose of the Act is Jemma Rowell, Director.

This *Privacy Policy* explains how we will use personal information about you, and the steps we take to ensure your personal information is kept secure and confidential. It should be read together with our *Terms of Business*.

INFORMATION WE MAY COLLECT ABOUT YOU

We may collect and process the following data about you:

Information you give us

You may give us information about you by filling in forms on our website or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you register to use our site, subscribe to our service, search for a product, participate in discussion boards or other social media functions on our site, such as enter a competition, promotion or survey, and when you report a problem with our site. The information you give us may include your name, address, e-mail and phone number, financial information, personal description and photographs.

Information we collect about you

Regarding each of your visits to our site we may automatically collect the following information:

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- information about your visit, 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), and methods used to browse away from the page and any phone number used to call our customer service number.

Information we receive from other sources

We may receive information about you if you use any of the other websites we operate or the other services we provide. In this case we will have informed you when we collected that data that it may be shared internally and combined with data collected on this site. We are also working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.

Holding and reviewing your information

We make sure that we have appropriate security measures to protect your information. We will periodically review your personal information to ensure that we do not keep it for longer than is permitted.

Note that it is your responsibility to check and ensure that all information, content, material or data you provide to us is correct, complete, accurate and not misleading and that you disclose all relevant facts.

In order to provide you with a quote, our lenders may need to collect personal information which data protection legislation defines as sensitive personal information, such as medical history or criminal convictions. We will request your consent to process this information at the time you give it and by proceeding a quote request, you give your explicit consent to such sensitive personal information being processed by us and our providers for the purposes stated in this *Privacy Policy*.

We do not knowingly collect or store any personal information about children under the age of 16. If you are aged under 16 please, get your parent or guardian's permission before you provide any personal information to us.

If you are providing us with another person's information, you should first ask them to read this *Privacy Policy* and our *Terms of Business*. By giving us information about another person you are confirming that they have given you consent to provide the information to us and that they understand how their details will be used.

In order to ensure the services, we provide you continue to meet your needs, we may ask you for feedback on your experience of using our Services. Any feedback you provide will only be used as part of our programme of continuous improvement and will not be published on the Site, unless your express permission is given.

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 allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them see our *Cookie Policy*.

USES MADE OF YOUR INFORMATION

We use information held about you in the following ways: a)

Information you give to us, we

- send you renewal information based on information you previously provided to us (if you have requested quotes) – when our systems indicate that your renewal is due (based on the dates you entered for your most recent quote).
- send you a confirmation email of your quote – when you obtain a quote with us, you will be sent confirmation of your quote by email so that you have a record of it and can easily retrieve your quote in the future. This is a standard part of our Services and by using the Services you agree to receive these communications;
- process a transaction between you and a third party;
- 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;
- provide you with information about other goods and services we offer that are similar to, those that you have already purchased or enquired about;

- contact you (with your agreement and depending on your contact preferences) via email, post, telephone, SMS, or by other electronic means such as via social and digital media this may include new product launches, newsletters and opportunities to participate in market research;
- notify you about changes to our service;
- ensure that content from our site is presented in the most effective manner for you and for your computer.

b) Information we collect about you, we

- administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- improve our site to ensure that content is presented in the most effective manner for you and for your computer;
- allow you to participate in interactive features of our service, when you choose to do so;
- part of our efforts to keep our site safe and secure;
- measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.

c) Information we receive from other sources. We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

DISCLOSURE OF YOUR INFORMATION

We will only collect and use your personal information in accordance with data protection laws. Our grounds for processing your personal information are as follows:

- Consent – Where necessary we will only collect and process your personal information if you have given your consent for us to do so, for example, we will only send you certain marketing emails and process any sensitive information about you if we have your consent.
- Legitimate Interests – We may use and process some of your personal information where we have sensible and legitimate business grounds for doing so. Under European privacy laws there is a concept of “legitimate interests” as a justification for processing your personal information. Our legitimate interests for processing your personal information are:
 - to enable you to access and use the services by: searching the websites of our partners to get you the best quotes; processing any transaction between you and a third party; and tracking sales. Using your information in this way is an essential part of us being able to provide the Services to you;
 - to communicate with you about the Services. We need to keep you informed about your use of the Services for example sending you a confirmation email of your quotes. This won't include marketing communications unless you have given us your consent to receive these; and
 - to improve our Services. We may use your personal information to: personalise aspects of our service; for market research. We constantly aim to improve our Services to you and using your personal information in this way helps us to do this.
- Analytics and search engine providers that assist us in the improvement and optimisation of our site.

- 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 disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If **IN-SYNC FINANCE LTD.** 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.

You will have a right to object to our use of your personal information for these legitimate interests, including where we may use your personal information to create a profile to inform customer demographics. If you raise an objection, we will stop processing your personal information unless very exceptional circumstances apply, in which case we will let you know why we are continuing to process your personal information. Please contact our team at info@insyncfinance.co.uk if you wish to exercise this right.

- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of **FUNDINGROUND Ltd.**, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

WHO DO WE SHARE YOUR PERSONAL INFORMATION WITH?

When you use any of our Services, we may disclose your personal information to the following parties:

1. our lenders including companies whose products or services are included on our Site, with a view to them: (i) providing you with a quote. When these companies use your personal information in this way, they will be acting as data controllers of your information and therefore we advise you to read your chosen provider's Privacy Policy; and/or (ii) using our customer insight products to understand customer behaviours and develop their product offerings. Some lenders with whom we share your information may use it to carry out research such as analysis of market trends and customer demographics and to customise and develop the product/service which they offer to you or other individuals in the future;
2. our channel operators: whilst the majority of the channels on our Site are run by us, some of our channels are designed and maintained for us by our service providers. We may receive your personal information from these service providers and use it in accordance with section 4 above. We will only use the personal information we receive from third parties where the relevant third party can show that it was collected and processed in accordance with the law;
3. other service providers that we engage to help us provide certain services and/or functionality, such as whether products are suitable for you. These include:
 - (i) our CRM system
 - (ii) our web designers and digital marketers
 - (iii) our telecommunications provider
 - (iv) our IT system and support
4. the Financial Conduct Authority and/or other regulatory/governing bodies, for the purposes of compliance monitoring;

Where permitted by data protection and privacy law, we may also disclose information about you (including electronic identifiers such as IP addresses) and/or access your account:

1. if required or permitted to do so by law;
2. if required to do so by any court, the Financial Conduct Authority, the Competition and Markets Authority or any other applicable regulatory, compliance, Governmental or law enforcement agency;
3. if necessary in connection with legal proceedings or potential legal proceedings; and/or
4. in connection with the sale or potential sale of all or part of our business.
5. if we reasonably believe false or inaccurate information has been provided and fraud is suspected, details may be passed to fraud prevention agencies to prevent fraud and money laundering.

WHO MIGHT OUR LENDERS SHARE YOUR PERSONAL INFORMATION WITH?

Our lenders will use your personal information to assess your circumstances and verify the information that you have provided before providing finance to you.

Some lenders may carry out checks with fraud prevention and credit reference agencies, both when you first apply for finance and at renewal. If providers do these checks, they will be quotation searches only, but will be visible to other organisations. Both public data (e.g. the electoral roll) and private data (e.g. your personal credit history) may be checked in this way.

Some lenders may carry out checks against data they already hold on you, (or is held by the company whose brand they administer the product for, or members of their group of companies) such as data from existing products, account data, data from previous product transactions, or accounts you may hold with them in order to determine your finance agreement.

This information exchange allows providers to verify the information that is provided during the quote process (including information about any third party who is named on the agreement), and also helps to detect fraudulent claims.

If you decide to enter into an agreement with a lender, the information you have provided to us, together with any further information requested by, and supplied by you or us to the lender, will be held by the lender for the purposes set out in that lender's privacy policy. Therefore, you are strongly advised to read your chosen provider's privacy policy and satisfy yourself as to the purposes for which the provider will use your personal information before entering into the agreement. We have no responsibility for the uses to which a lender puts your personal information.

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. Such staff may be 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.

The security of your personal data is very important to us. That's why, where appropriate, our Sites use HTTPS to help keep information about you secure.

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

YOUR RIGHTS

You have certain rights under existing data protection legislation including:

- Right to access: the right to request copies of your personal information from us;
- Right to correct: the right to have your personal information rectified if it is inaccurate or incomplete;
- Right to erase: the right to request that we delete or remove your personal information from our systems;
- Right to restrict our use of your information: the right to 'block' us from using your personal information or limit the way in which we can use it;
- Right to data portability: the right to request that we move, copy or transfer your personal information;
- Right to object: the right to object to our use of your personal information including where we use it for our legitimate interests or where we use your personal information to carry out profiling to inform our market research and customer demographics.

To make enquiries, exercise any of your rights set out in this *Privacy Policy* and/or make a complaint please contact our team at info@insyncfinance.co.uk

If you are not satisfied with the way any complaint you make in relation to your personal information is handled by us then you may be able to refer your complaint to the relevant data protection regulator which in the UK is the Information Commissioner's Office.

This *Privacy Policy* shall be governed and construed in all respects in accordance with the laws of England and Wales.

ACCESS TO INFORMATION

The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you.

AMENDING YOUR PREFERENCES

Any electronic marketing communications we send you will include clear and concise instructions to follow should you wish to unsubscribe at any time. You may also amend your marketing preferences by emailing us at info@insyncfinance.co.uk

Should you no longer wish to be contacted by us, you can advise us at any time by contacting our team on 01953 887120 or by sending an email to info@insyncfinance.co.uk

If you no longer wish to be contacted by lenders for marketing purposes, please follow the instructions in their marketing communications, or consult their privacy policies for further information about unsubscribing.

CHANGES TO OUR PRIVACY POLICY

Any changes we may make to our *Privacy Policy* in the future will be posted on this page and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to our *Privacy Policy*.

CONTACT

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to info@insyncfinance.co.uk