

DATA PROTECTION POLICY

Registered with the Information Commissioner's Office under registration reference: ZA03359

1. Personal data shall be processed fairly and lawfully and, in particular, shall not be processed unless-
 - at least one of the conditions in Schedule 2 is met, and
 - In the case of sensitive personal data, at least one of the conditions in Schedule 3 is also met.
2. Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes.
3. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
4. Personal data shall be accurate and, where necessary, kept up to date.
5. Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
6. About the rights of individuals e.g. personal data shall be processed in accordance with the rights of data subjects (individuals).
7. Appropriate technical and organizational measures shall be taken against unauthorized or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
8. Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

Personal data should only be processed fairly and lawfully. In order for data to be classed as 'fairly processed', at least one of these six conditions must be applicable to that data (Schedule2).

1. The data subject (the person whose data is stored) has consented ("given their permission") to the processing;
2. Processing is necessary for the performance of, or commencing, a contract;
3. Processing is required under a legal obligation (other than one stated in the contract);
4. Processing is necessary to protect the vital interests of the data subject;
5. Processing is necessary to carry out any public functions;
6. Processing is necessary in order to pursue the legitimate interests of the "data controller" or "third parties" (unless it could unjustifiably prejudice the interests of the data subject).

What your information will be used for

1. (CGN) Capital Growth Network Ltd will use the information you supply for the purposes of determining who you are, Fraud & Anti-Money Laundering supervision under the Fraud Act 2006 & Money Laundering Regulations 2007.
2. It may also, for the purposes of supervision, obtain information it considers relevant from other sources (for example, other regulatory, enforcement or public authorities).
3. While the Data Protection Act 1998 and section 237 of the Enterprise Act may restrict disclosure of such information, they also allow disclosure for a number of purposes without your further consent.
4. For example, (CGN) Capital Growth Network Ltd may use the information in connection with enforcement or regulatory action it takes under its own powers or may refer the information to other government departments or regulatory, enforcement or public authorities in connection with the exercise of their functions.

Your Information

This section explains how we will use information about you once you have applied for any of the products and services covered in this booklet together with any other products or services where we tell you this section will apply

Confidentiality

We take your personal information very seriously and will not share it with anyone (including other members of the CG Network), other than:

- Where we are legally required to disclose
- Where we have a public duty to disclose
- Where our legitimate business purposes require disclosure
- Where the disclosure is made with your consent or
- As set out in the terms below

General use and sharing of your information

The CG Network may collect, use and share relevant information about you, your transactions, your use of our products and services and your relationships with the CG Network:

- To process applications you make
- To supply you with products and services you request and
- For credit assessment, customer service, market research, behavioural scoring, product analysis, insurance, audit and administrative purposes.

This may include information provided by you or someone acting on your behalf. Where appropriate (for example if you have relationships with other members of the CG Network in other countries) this information may be shared with the CG Network outside of the UK.

We may use other members of the CG Network and or third parties to provide services on our behalf which may include the processing of information about you.

Whether it is processed in the UK or overseas, in accordance with data protection legislation, your information will be protected by a strict code of secrecy and security which all members of the CG Network, their staff and third parties are subject to.

Credit reference agencies

We may share information with credit reference agencies to verify your identity and suitability for an account, using information from the Electoral Register and other public sources

If you apply for credit, we may use details of your credit history to assess your ability to meet your financial commitments. The credit reference agencies will record details which will form part of your credit history whether or not you proceed with your application. If you make several applications within a short period of time this may temporarily affect your ability to obtain credit. We may share details of how you manage any current accounts or borrowing from us with credit reference agencies.

If we make demand for repayment following default and you fail to repay the full amount due or to make and keep to acceptable proposals for repayment within 28 days we may (in the absence of any genuine dispute about the amount owed) register the default with the credit reference agencies. This may affect your ability to obtain further credit.

If you make a joint application for a current account or credit, an association linking your financial records with those of your fellow applicant(s) will be created by the credit reference agencies. The credit history of your associates may be taken into consideration in any future application for credit. The association will continue to link your credit histories unless and until you successfully file a notice of disassociation with the credit reference agencies.

Crime prevention and debt recovery

To recover debt, prevent crime, verify your identity and meet our legal obligations, we may exchange information (both within the UK and, where appropriate, overseas) with other members of the CG Network and, where appropriate, with credit reference, debt recovery, fraud prevention and law enforcement agencies, and other relevant organisations including other lenders.

Your information may be processed for the purposes of complying with applicable laws including anti-money laundering and anti-terrorism laws and regulations and fighting crime and terrorism. This may require the disclosure of information to UK or overseas governmental or regulatory authorities or to any other person we reasonably think necessary for these purposes.

In order to prevent or detect fraud, the information provided in the application will be shared with fraud prevention agencies. If false or inaccurate information is identified, details will be passed to fraud prevention agencies to prevent fraud and money laundering.

Further information on credit scoring, credit reference and fraud prevention agencies

Further details on credit scoring and explaining how information held by CRAs and fraud prevention agencies may be used is set out in a leaflet entitled “A Guide to Credit Scoring” available on our website www.cgnequity.com or can be requested by phoning 020 8127 5021. Please call this number if you require details of the credit reference and fraud prevention agencies we use. Lines are open 9.00 am to 5.00 pm Monday to Friday and 10.00 am to 2.00 pm on Sundays, excluding public holidays.

Information about products, services and promotions and market research

If you agree, the CG Network may use and share relevant information about you, your transactions and your relationships with the CG Network to give you information about products, services and promotions available from members of the CG Network and selected third parties which may interest you by post, telephone, electronic and other means.

We will ask you whether you are happy for us to contact you about such products and services when you open an account. If you change your mind at any time please let us know.

The CG Network may share relevant information about you, your transactions and your relationship with third party market research agencies who may invite you (by post, telephone, electronic and other means) to take part in market research activities for the CG Network. **If you do not wish to be contacted for market research purposes please let us know.**

The CG Network may also exchange, analyse and use relevant information about you in the way described above to ensure that promotional content displayed to you on screen when you log on to CG Network websites is more likely to be relevant and of interest. If you do not want us to use what we know about you to decide what we display to you on our websites, please let us know. Further information is available on our privacy statement at our website www.cgnequity.com

Miscellaneous

Under data protection legislation, you can make a written request for a copy of certain personal records we hold about you. The current fee is £10.00 per request from each individual.

To ensure that we carry out your instructions accurately, to help us to improve our service and in the interests of security, we may monitor and or record your communications with us including telephone calls and conversations we have with you in our branches. Any recordings remain our sole property.

We may make and retain copies of passports, driving licences or other identification evidence that you provide.

We will obtain your written consent before providing a banker's reference about you, however, if we receive a request from another financial services institution we will provide information required to verify your identity for money laundering prevention purposes.

We may share information about you with any third party:

- To whom we transfer, or may transfer, any of our rights and obligations under the terms; or
- In connection with the sale, acquisition or restructure of any member of the CG Network provided that the third party uses such information for the same purposes for which it was supplied to us or used by us.

You the undersigned request that (CGN) Capital Growth Network Ltd (the bank) open a

Student Loan Account
Loan Account
INV Account

You agree that your account(s), or other product/facility you may have shall be subject to the General Terms and Conditions, our Terms & Conditions are applicable to said account(s) or other product/facility.

You confirm that:

- The information supplied is accurate and true to the best of your knowledge and you are 21 years of age or over
- You have received/have previously received a copy of the General Terms & conditions we have told you are applicable to your account(s) or other product/facility
- You have had the opportunity to decide whether, and, if so, by which channels, members of the CG Network may give you information about additional products and services.

Any of our terms and conditions may be varied by us from time to time in the ways set out in the terms and conditions document page 15.

NAME:

SIGNATURE:

DATE: / / 2015