



DATA PROTECTION POLICY – ZB618972

Personal data is defined in the UK GDPR as:

“Personal Data means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.” <https://rb.gy/sc4cf>

We take your personal information very seriously and will not share your data with anyone other than as set out in the policy below. CGN Ltd. is completely transparent about how we use your data. We also recognise the rights and freedoms to which all our customers are entitled.

1. Personal data shall be processed fairly and lawfully and, shall not be processed unless-
 - at least one of the conditions in **Schedule 2** is 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.



SCHEDULE 2

Personal data should only be processed fairly and lawfully. For data to be classed as 'fairly processed', at least one of these six conditions must be applicable to that data.

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 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

CGN Ltd. will collect, use, and may share relevant information about you, your transactions, your use of our products and services and your relationships with Capital Growth Network Ltd. This section explains how we will use information about you once you have applied for any of our products and or services.

This may include information provided by you or someone acting on your behalf. Where appropriate (for example if you have relationships with other members across 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.

WHY WE NEED YOUR DATA

- (CGN) Capital Growth Network Ltd will use the information you supply for the purposes of determining who you are, Anit-Fraud & Anti-Money Laundering supervision under the Fraud Act 2006 & Money Laundering Regulations 2007.
- To communicate efficiently with you in terms of reminders & promotions and to provide you with the best possible customer care and support.
- We may also, for the purposes of supervision, obtain information it considers relevant from other sources (for example, other regulatory, enforcement, credit reference agencies or public authorities).
- 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 bodies, law enforcement, credit reference agencies or public authorities in connection with the exercise of their functions.



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 irrespective of the outcome of 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 30 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.

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.



YOUR RIGHTS

Under the terms of data protection legislation, you have the following rights. To exercise any of these rights, please contact our Data Protection Officer using the details on page 7.

RIGHT TO BE INFORMED

We pledge to tell you precisely how we intend to use your data. This document helps to fulfil that pledge, although for full details, you are advised to read our online legal status. If you do not have internet access, you can contact our Data Protection Officer at the postal address on page 7 and ask for a copy of the legal status in an alternative form.

RIGHT TO ACCESS

You have the right to ask us for a copy of any personal data that we hold about you. This is known as a “Subject Access Request”. We will send you a copy of the information within 10 working days of your request. For detailed information, refer to pages 5 & 6 of our Terms & Conditions

RIGHT TO BE RECTIFICATION

If any of the information that we hold about you is inaccurate, you can contact our Data Protection Officer who will make the necessary corrections.

RIGHT TO BE FORGOTTEN

You can ask that we erase all personal data that we hold about you. Where it is appropriate that we comply, your request will be actioned within 30 days.

RIGHT TO OBJECT

If you no longer want us to use your data for any purpose for which you previously consented – or for any purpose which we have deemed legitimate – you have the right to object.

RIGHT TO RESTRICT PROCESSING

If you wish us to limit the use of your data but you do not want your data erased, you can request that we restrict processing.

RIGHT TO DATA PORTABILITY

If you would like us to move, copy or transfer the data that we hold about you to another organisation, please contact our Data Protection Officer. Please be advised that this only applies to certain data which has been submitted by you electronically for specified purposes.



RIGHTS RELATED TO AUTOMATED DECISION-MAKING

So that we can understand your interests & preferences and deliver communications that will be of interest to you, where you consent, we will use the data that you give us, as well as other information such as your borrowing history. If you do not want us to undertake this form of data processing, you may either object to the processing of your data, or request that we erase all personal data about you.



FURTHER INFORMATION

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 the following methods:

Email: info@cgnequity.com attn - Data Protection Officer

Telephone: 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.

Write to:

Data Protection Officer
(CGN) Capital Growth Network Ltd.
167 Gloucester Terrace
W2 6DX

Further information is available in the Terms & Conditions and Legal Status pages of our website www.cgnequity.com

COMPLAINTS

If you wish to complain about any of our products or services, we have procedures designed to resolve your complaint effectively. Please refer to pages.29 – 31 of our Terms & Conditions

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.*

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.



General Data Protection Regulation (GDPR) Request for Access to Personal Information

- You'll need name and address identification, please ensure that you provide this information. We won't be able to process your request until we have been able to verify your identity. Once we've received this information, we have 1 month in which to comply with your request.
- Applying on behalf of someone else - If you're applying on behalf of someone else, please enter their details overleaf, as well as providing proof of their identity and address. You'll also need to provide your contact information, written authority from them that you're acting on their behalf, and proof of your identity and address.
- Voice recordings of calls you've made to us or that we've made to you - We don't record all calls to and from us and any recordings that we do make are held for no longer than **12 months**, so we may not be able to send you a recording of a specific call that you request.
- Copies of contracts - We can supply you with a signed copy of your contract/agreement. If you want details of your outstanding balance, please contact Customer Services on 020 8127 5021.
- Contacting us - Address: Registered Office: 167 Gloucester Terrace, London, W2 6DX
- *The current fee is **£10.00** per request.*



General Data Protection Regulation (GDPR) Request for Access to Personal Information

Please read the important information section before completing this form.

Your details	
Full name	
Address and postcode	
Contact phone number	
Email address	
Date of birth	
Please help us by explaining what information you require.	
Please let us know if the request relates to a specific event or contact.	
<i>YOUR REQUEST WILL NOT BE PROCESSED WITHOUT PROOF OF IDENTITY & ADDRESS.</i>	
I have provided 2 proofs of identity and address (e.g., a photocopy of your valid UK photo driver's license/passport, PLUS a current utility bill not including mobile phone bill).	

Declaration
I confirm that the information supplied on this form is true and that I am the data subject or am acting on their behalf. I understand that (CGN) Ltd. may seek to confirm my identity and to obtain further information where this is necessary.
Signature:
Date:

Returning this form
Please return this form with evidence of identity and address to:
The Data Protection & Privacy Officer, (CGN) Capital Growth Network Ltd. 167 Gloucester Terrace, London W2 6DX

UPDATED: 2023/10/29