

# Privacy Policy

At Bellerive Finance we want you to understand how we use your personal information and to be confident that this information is safe and secure. This privacy policy explains why we collect your information, how we use it, and the steps we take to keep it secure and confidential. It also outlines your rights and choices about how we use your personal information.

We keep our privacy policy under review, and we recommend that you check it regularly. This privacy policy was last updated on 27 January 2021.

## **This privacy policy covers:**

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Where we refer to Bellerive Finance, we mean Bellerive Finance plc, Bellerive Global Finance Limited, Bellerive Global Services Limited and its wholly owned subsidiary companies and cells.

## **Using your information to provide services**

Bellerive Finance offers a wide range of services. To do this, we collect and hold personal information that identifies clients, intermediaries, suppliers and third parties linked to our clients and others (such as people who use our website or contact us by email). The types and amount of information we collect differs depending on your relationship with us. We only collect the data we need in order to respond to you or provide the services you have asked for, or that we need in order to fulfil our legal or regulatory obligations in relation to those services. If we need to collect additional information, we will explain why we need it.

You are not obliged to provide any of the information we ask you for, but if you choose not to, we may be unable to provide you with services or respond to your enquiries.

However, you may refuse to provide us with information for our marketing purposes without any effect on our services to you.

The examples in this section are only an overview of the types of processing we carry out. If you would like to discuss how we would process your personal data specifically, please contact us.

When you enquire about our services or you use our services, your personal information may be used for:

- Responding to enquiries, offering services, and agreeing terms of business
- Communicating with you about the services you have asked us to provide and informing you of changes that affect those services
- Providing financing services
- Keeping track of payments and amounts owing
- Contacting other service providers to fulfil our contract or answer your questions

There are times when we are under a legal obligation to collect or use your personal information, including:

- Requirements under our licences or government authorisations to do business
- Recording and/or reporting information as required by law, including laws to prevent financial crime, evasion of tax, and the funding of terrorism

There are occasions where it is in our legitimate interest to collect and process your information, for example:

- Our website may collect information about your computer so that it will display properly.
- Analysing details of the number of visits to our website and the pages visitors view allows us to update and improve it. This allows us to refine the site and make visits to our website more interesting and informative.
- We carry out stringent background checks to ensure that potential and existing clients and people connected with them will not cause us reputational damage.
- When you ask us to provide services, we need to assess the risks associated with providing that service. This will involve us using information we hold and information from background checks and credit reference checks to evaluate the risks to you, to Bellerive Finance, and to any organisations whose products or services we are providing for you.
- To make you aware of additional or new services that we feel could be of benefit to you and will complement the services we already provide.

In some circumstances we cannot process your data without your explicit consent, such as when your physical or mental capacity for decision-making needs to be assessed. If we ask you to provide sensitive information, we will fully explain your options before we ask you to provide it.

## **Sharing your information within our group**

We share your information with companies in our ownership group where it is necessary to provide you with services or to allow our company boards to have full oversight of our operations.

To enable Bellerive Finance to operate on an international scale, some of our business functions are shared at group level. These specialist functions include Accounting, Risk Management, Compliance, Data Protection and Finance. In addition, some specialist services that support our business are also centralised, such as IT and Internal Audit. There are times when we cannot provide the relevant services without using some personal information. In these cases, access is granted only to employees who need it in order to provide those services, and the amount of information shared is limited to the minimum that will allow them to fulfil their functions.

## **Sharing your information with other organisations**

In the usual course of our business, we use third-party organisations to support the essential delivery of our services. Under these circumstances, Bellerive Finance remains responsible for the security and privacy of your information, and we review all third parties' security measures to ensure they meet the same standards you expect from Bellerive Finance. All third-party organisations operate under contracts that restrict their use of your personal information to providing the services for which we have employed them.

The services they provide include:

- Providing and supporting the IT systems in which your information is stored
- Transportation and storage of information and confidential destruction
- Preparation of company accounts and financial statements

We may also have an obligation to share some of your personal information with public authorities, such as:

- Tax and VAT authorities
- Regulatory authorities
- Law enforcement agencies

In some cases, your personal information will be shared with organisations outside Bellerive Finance in order to obtain specialist or professional services that are necessary for the services we provide. These include:

- Your or our professional advisers, such as accountants, lawyers and agents
- Banks or other financial institutions
- Credit reference and background search agencies who assist us in meeting our customer due diligence obligations

These external organisations have a legal obligation to comply with privacy and data protection legislation and may also operate under a professional duty of confidentiality due to the type of service they provide. They have their own privacy policies that provide information about how they use your information.

## **Transferring your information to other countries**

When we share your information with organisations that are located in different countries or territories, including other companies in our group, we ensure they apply levels of protection of your personal information that are equivalent to ours.

By law, personal information can flow freely between the United Kingdom, countries in the European Economic Area and countries and territories that are recognised as providing adequate data protection by the European Commission. For other international transfers, we put data sharing contracts in place to ensure that you retain the same rights and protections in the recipient country as you have in the country where your information was originally collected. If you would like more information about this, please contact us.

## **Using your contact details**

From time to time, we will send you important notices about the products or services you have asked us to provide, changes to our policies or terms and conditions, or changes to laws or regulations that could affect the service we provide.

We may also send you emails containing newsletters and articles, information about additional products or services provided by us, or invitations to events we are organising, attending or sponsoring. You can opt out of receiving these messages by emailing us or by clicking on the unsubscribe link in those emails.

We never sell or lease your personal information or share it with other organisations outside Bellerive Finance for marketing purposes.

## **Storing and deleting your information**

The amount of time we keep your personal information will vary depending on your relationship with Bellerive Finance. In some circumstances, there is a legal or regulatory requirement to keep information for a specific amount of time, although this will be extended if there is ongoing legal action that overrides the normal retention

period. Where there is no regulatory or legal requirement, we assess how long we reasonably need to keep your information in order to deal with ongoing queries.

When our relationship with you ends, there will be information we cannot delete immediately. Such information will be stored in our physical and/or electronic archives until we no longer have an obligation to keep it. At that point the information will be permanently deleted.

## **Keeping your information secure**

We take the security of personal information and confidential documents extremely seriously. Bellerive Finance complies with data protection legislation where we operate. We have put in place appropriate safeguards to prevent unauthorised access or unlawful use of confidential information.

We restrict access to personal information to Bellerive Finance employees, contractors and agents who need to know that information in order to process it for us. They are subject to strict contractual confidentiality obligations, and they may be disciplined or their contracts terminated if they fail to meet these obligations.

## **Your rights**

Subject to some exceptions, you have the right to:

- Know whether Bellerive Finance is processing your personal information
- Request a copy of the personal information Bellerive Finance holds about you
- Have inaccuracies in your personal information corrected or and have incomplete personal data completed
- Have your personal data erased if it is no longer needed
- Ask Bellerive Finance to restrict the processing of your data
- Object to Bellerive Finance processing your data
- Ask for your data to be transferred to a new service provider
- Object to processing that is carried out in Bellerive Finance's legitimate interests
- Not be subject to a decision based solely on automated processing if it produces legal effects or similarly affects you
- If you have previously given consent for Bellerive Finance to use your personal information, to withdraw that consent for future use
- Make a complaint to a data protection authority
- Appeal decisions by the data protection authorities (within strict time limits)

You may email us to exercise your rights or find out more about them.

## **Links to external sites**

The Bellerive Finance website contains links to other websites that are not controlled by Bellerive Finance. We are not responsible for the privacy of those sites, and we encourage you to review the privacy policies of each one when you visit external sites, so that you understand how those other organisations are using your personal information.

## **Cookies**

A cookie is a file that is sent to your computer or other access device when you visit a website. The Bellerive Finance website uses cookies to analyse user activities, which helps us to develop and make improvements to the site. We do not use the cookies to identify which individuals visit our website.

## **Queries and complaints**

This privacy policy aims to give you an overview of the ways in which we process your personal information. If you would like more detail or have any queries, please contact us so that we can assist you. We take any complaints we receive about the way we process your information very seriously, and we would like to hear from you if you have any concerns. Please refer to the Contact us section at the bottom of this policy for information about our contact details.

If you have any concerns about the way we process your personal information, please contact us to discuss your concerns. You also have the right to make a complaint to the data protection authority in the country where the Bellerive Finance company who collected your information is located.

In the United Kingdom, the Information Commissioner's office may be contacted at +44 (0)303 123 1113 or at its website: <https://ico.org.uk>

In Guernsey, the Office of the Data Protection Authority may be contacted at +44 (0)1481 742074, by email at [enquiries@odpa.gg](mailto:enquiries@odpa.gg) or at its website: <https://odpa.gg>

If you are in the European Economic Area, you may contact the data protection authority in your country. Their contact details can be found at [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en)

## **Contact us**

If you have any questions about this privacy policy or any other data protection issues, please contact:

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