

PRIVACY POLICY

1 INTRODUCTION

- This Privacy Policy explains what we do with your personal data when you visit our website www.creditenable.com/ (the **Website**), our platform, when your organisation registers as member of our platform, when we have collected your data in order to provide services to our clients and third party data providers (the **Services**) and when we provide services to your organisation through our platform (the **Platform**).
- It describes how we collect, use and process your personal data, and how, in doing so, we comply with our legal obligations to you. Your privacy is important to us, and we are committed to protecting and safeguarding your rights.
- For the purpose of applicable data protection legislation (including but not limited to the General Data Protection Regulation¹ (Regulation (EU) 2016/679) (the "**GDPR**"), the company responsible for your personal data ("**CreditEnable**" or "**us**") is Oktober6 Ltd, of The Courtyard, 14a Sydenham Road, Croydon, England, CR0 2EE.
- We may amend this Privacy Policy from time to time. Please visit this page if you want to stay up-to-date as we will post any changes here.
- If you are dissatisfied with any aspect of our Privacy Policy, you may have legal rights which we have described below where relevant.

2 WHAT KIND OF PERSONAL INFORMATION DO WE COLLECT?

If you visit the Website or you or your organisation use the Services, we need to collect and use information about you or individuals at your organisation in the course of providing the Website, the Platform and the Services. Depending on the relevant circumstances, we may collect some or all of the information listed below to help us with this:

- Names of directors, executives or founders of your organisation;
- Business activities of directors, executives or founders at your organisation;
- Login details;
- Your name;
- Your telephone number;
- Your email address;
- Other information that may be available through the Ministry of Corporate Affairs or Companies' House; and
- IP address.

3 HOW DO WE COLLECT YOUR PERSONAL DATA?

We collect your personal data in three primary ways:

1. Personal data that you give to us;
2. Personal data that we receive from other sources; and
3. Personal information we collect automatically.

Personal data you give to us

- Where your organisation registers with our platform;

¹ The GDPR has an effective date of 25 May 2018, and any references to it should be construed to include any national legislation implementing it.

- Where your organisation uploads information about itself to our platform.
- When you access the Website or use the Services.

Personal data we receive from other sources

- We may seek more information about your organisation from other sources generally by way of due diligence or other market intelligence including research and analysis of the filed accounts of your organisation.
- We may collect your personal data from publicly available sources (including Companies House (in the UK or otherwise)) to enable us to provide the Services.

Personal data we collect automatically

- When you visit our platform, we collect 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.

4 WHY WE USE YOUR PERSONAL DATA?

We collect and use your personal data for a number of reasons, including:

- To carry out our obligations to you as a result of any contract entered into between us and you or your organisation.
- To enable us to provide the analysis and reports requested by you or your organisation.
- To verify your identity to ensure that you are authorised to access the platform and to protect against unauthorised use and access of the platform.
- To better understand your lending preferences to enable us to provide you with a better service and tailored suggestions for your lending needs.
- To improve your experience of using the Platform, for example by analysing your recent search criteria to help us to present the information that is most relevant to you.
- To notify you about changes to the products and services that we offer and to directly market these products and services to you.
- To administer the Platform for internal operations, including troubleshooting, data analysis, testing, research and statistical and survey purposes.
- To provide our clients and other third party data platforms with the Services.
- To administer and maintain the Website.

5 WHO DO WE SHARE YOUR PERSONAL DATA WITH?

We will share your personal data primarily to ensure we provide you with the most efficient and effective services to you. Unless you specify otherwise, we may share your information with any of the following groups:

- Lenders that can login to our platform to download reports on your organisation;
- Borrowers, who may be provided with the contact details of someone at the lending organisation;
- Our clients or other third party data platforms to whom we provide the Services;
- Any of members of our group company where this is necessary, and in accordance with laws on data transfers;
- Tax, audit, or other authorities, when we believe that the law or other regulation requires us to share this data (for example, because of a request by a tax authority or in connection with any anticipated litigation);

- Third party service providers who perform functions on our behalf (including external consultants and professional advisers such as auditors and accountants, technical support functions and IT consultants carrying out testing and development work on our business technology systems);
- Third party outsourced IT providers where we have an appropriate data processing agreement (or similar protections) in place;
- Other third parties who have an association with you (for example, suppliers to your industry) who may wish to provide you with direct marketing information about their products and services; and
- If CreditEnable merges with or is acquired by another business or company in the future, we may share your personal data with the new owners of the business or company (and provide you with notice of this disclosure).

6 HOW DO WE SAFEGUARD YOUR PERSONAL DATA?

We care about protecting your information. That's why we put in place appropriate measures that are designed to prevent unauthorised access to, and misuse of, your personal data.

We are committed to taking all reasonable and appropriate steps to protect the personal information that we hold from misuse, loss, or unauthorised access. We do this by having in place a range of appropriate technical and organisational measures, including encryption measures and disaster recovery plans.

If you suspect any misuse or loss of or unauthorised access to your personal information please let us know immediately. Please raise your concern with info@creditenable.com, in the first instance, and we will investigate the matter and update you as soon as possible on next steps.

7 HOW LONG DO WE KEEP YOUR PERSONAL DATA FOR?

We will not keep your personal data for longer than is necessary for the purposes for which we collect it unless we believe that the law or other regulation requires us to preserve it (for example, because of a request by a tax authority or in connection with any anticipated litigation).

When it is no longer necessary to retain your data, we will delete the personal data that we hold about you from our systems. While we will endeavour to permanently erase your personal data once it reaches the end of its retention period, some of your personal data may still exist within our systems, for example if it is waiting to be overwritten. For our purposes, this data has been put beyond use, meaning that, while it still exists in the electronic ether, our employees will not have any access to it or use it again.

8 WHAT ARE MY RIGHTS?

You have various rights in relation to the data which we hold about you. We have set these out below.

To get in touch with us about any of these rights, please contact info@creditenable.com. We will seek to deal with your request without undue delay, and in any event within one month (subject to any extensions to which we are lawfully entitled). Please note that we may keep a record of your communications to help us resolve any issues which you raise.

The GDPR gives you the following rights in relation to your personal data:

Right to object

This right enables you to object to us processing your personal data where we do so for one of the following reasons:

- because it is in our legitimate interests to do so;
- to enable us to perform a task in the public interest or exercise official authority;
- to send you direct marketing materials; or
- for scientific, historical, research, or statistical purposes.

Right to withdraw consent

Where we have obtained your consent to process your personal data for certain activities (for example, for marketing), you may withdraw this consent at any time and we will cease to use your data for that purpose unless we consider that there is an alternative legal basis to justify our continued processing of your data for this purpose, in which case we will inform you of this condition.

Data Subject Access Requests

You may ask us for a copy of the information we hold about you at any time, and request us to modify, update or delete such information. If we provide you with access to the information we hold about you, we will not charge you for this unless permitted by law. If you request further copies of this information from us, we may charge you a reasonable administrative cost. Where we are legally permitted to do so, we may refuse your request. If we refuse your request we will always tell you the reasons for doing so.

Right to erasure

You have the right to request that we "erase" your personal data in certain circumstances. Normally, the information must meet one of the following criteria:

- The data are no longer necessary;
- You have withdrawn your consent to us using your data, and there is no other valid reason for us to continue;
- The data has been processed unlawfully;
- It is necessary for the data to be erased in order for us to comply with our obligations under law; or
- You object to the processing and we are unable to demonstrate overriding legitimate grounds for our continued processing.

We would only be entitled to refuse to comply with your request for erasure in limited circumstances and we will always tell you our reason for doing so.

When complying with a valid request for the erasure of data we will take all reasonably practicable steps to delete the relevant data.

Right to restrict processing

You have the right to request that we restrict our processing of your personal data in certain circumstances, for example if you dispute the accuracy of the personal data that we hold about you or you object to our processing of your personal data for our legitimate interests. If we have shared your personal data with third parties, we will notify them about the restricted processing unless this is impossible or involves disproportionate effort. We will, of course, notify you before lifting any restriction on processing your personal data.

Right to rectification

You have the right to request that we rectify any inaccurate or incomplete personal data that we hold about you. If we have shared this personal data with third parties, we will notify them about the rectification unless this is impossible or involves disproportionate effort. You may also request details of the third parties that we have disclosed the inaccurate or incomplete personal data to. Where we think that it is reasonable for us not to comply with your request, we will explain our reasons for this decision.

Right of data portability

If you wish, you have the right to transfer your personal data between service providers. In effect, this means that you are able to transfer the details we hold on you to another third party. To allow you to do so, we will provide you with your data in a commonly used machine-readable format so that you can transfer the data. Alternatively, we may directly transfer the data for you.

Right to complain

You also have the right to lodge a complaint with your local supervisory authority, which will be the Information Commissioner's Office in the UK. You can contact them in the following ways:

- Phone: 0303 123 1113
- Email: casework@ico.org.uk
- Live chat
- Post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

9 WHO IS RESPONSIBLE FOR PROCESSING YOUR PERSONAL DATA?

CreditEnable is responsible for processing your personal data. CreditEnable is a limited company with its registered office located at The Courtyard, 14a Sydenham Road, Croydon, England, CR0 2EE.

If you have any comments or suggestions concerning this Privacy Policy please contact us:

- By email: info@creditenable.com

We take privacy seriously and will get back to you as soon as possible.

10 HOW DO WE STORE AND TRANSFER YOUR DATA INTERNATIONALLY?

The data that we collect from you will be transferred to, and stored at, destinations both within and outside the European Economic Area (EEA).

We want to make sure that your personal data is stored and transferred in a way which is secure. We will therefore only transfer data outside of the EEA where it is compliant with data protection legislation and the means of transfer provides adequate safeguards in relation to your data. For example, this could be:

- By way of an intra-group agreement between Oktober6 Ltd entities, incorporating the current standard contractual clauses adopted by the European Commission for the transfer of personal data by controllers in the EEA to controllers and processors in jurisdictions without adequate data protection laws;
- By way of a data transfer agreement with a third party, incorporating the current standard contractual clauses adopted by the European Commission for the transfer of personal data by controllers in the EEA to controllers and processors in jurisdictions without adequate data protection laws; or
- By transferring your data to an entity which has signed up to the EU-U.S. Privacy Shield Framework for the transfer of personal data from entities in the EU to entities in the United States of America or any equivalent agreement in respect of other jurisdictions; or
- By transferring your data to a country where there has been a finding of adequacy by the European Commission in respect of that country's levels of data protection via its legislation; or
- Where it is necessary for the conclusion or performance of a contract between ourselves and a third party and the transfer is in your interests for the purposes of that contract (for example, if we need to transfer your data to a benefits provider based outside the EEA); or
- Where you have consented to the data transfer.

Where we transfer your personal data outside the EEA and where the country or territory in question does not maintain adequate data protection standards, we will take all reasonable steps to ensure that your data is treated securely and in accordance with this policy.

11 LEGAL BASES FOR US PROCESSING YOUR DATA

There are a number of different ways that we are lawfully able to process your personal data. We have set these out below.

Where processing your data is within our legitimate interests

We are allowed to use your personal information where it is in our interests to do so, and those interests aren't outweighed by any potential prejudice to you.

We believe that our use of your personal information is within a number of our legitimate interests, including but not limited to:

- To administer our platform for internal operations, including troubleshooting, data analysis, testing, research, and statistical and survey purposes
- To help us understand you better and provide you with better, more relevant services
- To ensure that our systems run smoothly
- To help us keep our systems secure and prevent unauthorized access or cyber attacks
- To drive commercial value

We don't think that any of the activities set out above will prejudice you in any way. However, you do have the right to object to us processing your personal information on this basis. We have set out details regarding how you can go about doing this in the "Access, Correction and Inquires" section below.

Where you give us your consent to process your personal data

We are allowed to use your personal information where you have specifically consented. In order for your consent to be valid:

- It has to be given freely, without us putting you under any type of pressure;
- You have to know what you are consenting to – so we'll make sure we give you enough information;
- You should only be asked to consent to one thing at a time – we therefore avoid "bundling" consents together so that you don't know exactly what you're agreeing to; and
- You need to take positive and affirmative action in giving us your consent – for example, we could provide a tick box for you to check so that this requirement is met in a clear and unambiguous fashion.

We seek your consent when you register to use our platform. Before giving your consent you should make sure that you read any accompanying information provided by us so that you understand exactly what you are consenting to.

You have the right to withdraw your consent at any time, and details of how to do so can be found above in the "Right to withdraw consent" section above.

Where processing your personal data is necessary for us to carry out our obligations under our contract with you

We are allowed to use your personal information when it is necessary to do so for the performance of our contract with you.

For example, we need to hold your email address in order to be able to send you reports and other analysis where you have requested them.