



## PRIVACY AND COOKIE POLICY

Ferratum UK Limited is committed to ensuring that your privacy is protected. This privacy policy sets out how Ferratum UK Limited our group companies, both current and in the future, as we develop new business either on our own or with others (referred to in this privacy policy as “us”, “we” or “our”) uses and protects any information that you give to us when you use our website or enter into an agreement with us (whether for a loan or otherwise). If you are asked you to provide certain information by which you can be identified when using this website, you can be assured that it will only be used in accordance with this privacy policy.

We may change this policy from time to time by updating this page. You should therefore check this page from time to time to ensure that you are happy with any changes. Where appropriate we will also notify you of any changes by post or email. This policy is effective from \_\_\_\_\_.

For the purpose of the Data Protection Act 1998, to the extent that we determine the manner and the purpose of the processing of your personal data, the data controller is Ferratum UK Limited, whose business address is Suite 318, 25 Goodlass Road, Liverpool L24 9HJ.

### What we collect

We may collect and process the following information about you:

- information that you provide by filling in forms on our website ([www.ferratum.co.uk](http://www.ferratum.co.uk) and any of its sub-pages), including information provided at the time of applying for a loan or requesting other products or services;
- details of loans you apply for through our website and use of SMS messages and details of the status of your loan account with us; and
- if you contact us for any reason, we may use and process any personal details that you provide and keep a record of the correspondence.

We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.

We may also collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

### Where we store your personal information

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, for one of our suppliers or third parties with whom we work. Such staff maybe 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 reasonable steps necessary to ensure that your data is treated securely and in accordance with this privacy policy.

## Security

Unfortunately, the transmission of information via the internet is not completely secure. 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 are committed to ensuring that it is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect. All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL technology.

## What we do with the information we gather

We use information held about you in the following ways:

- to carry out our obligations and enforce our rights arising from any contracts we enter into with you;
- for fraud prevention and debt collection purposes;
- to understand your needs and provide you with a better service (this may include contacting you for market research purposes and we may use the information provided to customise our website according to your interests);
- for internal record keeping (including details of your loan account and any correspondence between us and you);
- to improve our products and services and to notify you about changes to our service; and
- to allow you to participate in interactive features of our service, where you choose to do so.

We may also use your personal data, or pass your details to selected third parties for them to use your data, for marketing purposes on the following basis:

- if you are an existing customer, we may contact you by electronic means (e-mail or SMS) with information about products and services similar to those which have previously been provided by us to you (unless you let us know that you do not wish us to do so);
- we may contact you by post or telephone to provide you with information about other products and services which may be of interest to you (unless you let us know that you do not wish us to do so);
- we may contact you by email or SMS about other products and services which may be of interest to you only if you have consented to this;
- selected third parties may contact you by post, telephone, email or SMS about other products and services which may be of interest to you where you have expressly consented to this.

## Disclosure of your information

We may disclose your personal information to any company within our group (such as any subsidiary company, holding company, associated company or affiliated company) for any of the same purposes for which we may use the information. A list of our group companies can be obtained by contacting us via email, post or telephone. Our contact details can be located above.

We may disclose your personal data to third parties for marketing purposes but only where you consent to this.

We may disclose your personal information to third parties in the following circumstances:

- in the event that we sell or buy, or are in the process of selling or buying, any business or assets either in whole, or in part (in which case, we may disclose your personal data to the prospective seller or buyer of such business or assets);

- if we (or substantially all of our assets) are acquired or in the process of acquisition, by a third party (in which case your personal data may be one of the transferred assets);
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation;
- in order to enforce or apply our terms of use, any loan agreement you enter into with us or any other contracts we enter into with you. This may include disclosing your personal information with third parties for credit or debit card clearance, credit reference checks, verification of your indemnity, data analysis or customer support purposes;
- in order to protect our rights, property, or those of our staff, customers or others, or for safety reasons. This includes exchanging information with other companies and organisations for the purposes of fraud protection, professional advisors and credit risk reduction.

Ferratum may exchange and/or transfer personal data to the parties listed below.

- Employees and group companies, business associates or agents, whether based within or outside the EU/EEA;
- Credit reporting agencies, rating agencies and any similar agencies who provide information regarding the credit worthiness of potential customers;
- Entities providing information on the credit history of potential customers;
- Professional advisors of us, contractors and other service providers (e.g. IT consultants);
- Legal and financial advisors;
- Taxation Office and other government departments, agencies or bodies, or judicial authorities or bodies to whom we may be required by law to disclose information;
- Financiers of us;
- Other credit providers and financial institutions;
- Payment system operators;
- Reinsurers, insurance underwriters/providers used by us in relation to our insurance policies;
- Other third party service providers;
- Other third parties with whom we are obliged to share the customer's information in terms of legal and regulatory obligations.

## Credit reference agencies and other agencies

To help us to make a lending decision about you (or in connection with any loan agreement subsequently entered into) we may search your records at any relevant credit reference agencies and/or fraud prevention agencies. Such agencies may add to their record about you details of our search which may be seen by other organisations making searches. We may also send certain of your information to the credit reference agencies. If we enter into a lending arrangement with you we will add information relating to our lending arrangement with you to your credit reference agency record, including if you do not comply with the repayment terms. We may throughout the term of any lending arrangement make periodical searches of your records at the credit reference agencies and/or fraud prevention agencies and other similar agencies and you agree to us verifying your creditworthiness both now and in the future.

The information held about you by credit reference agencies may be linked to records relating to one or more of your partners and/or members of your household or any person with whom you are linked financially (such as spouses, partners and where a Director of a Company, your fellow Directors). This is called an 'association'. For the purposes of us making a lending decision about you, you and your associations will be treated as financially independent and your application will be assessed without reference to any 'associated' records. By making an application to us you declare that there is no information relating to your partner(s) that is likely to affect our willingness to offer financial services to you. You authorise us to check the validity of this declaration with credit reference agencies.

We, the credit reference agencies and the fraud prevention agencies will also use your records for statistical analysis about credit, insurance and fraud. All organisations that collect and process personal data are regulated by the Data Protection Act 1998, overseen by the Information Commissioner's Office. All credit reference agencies are in regular dialogue with the Information Commissioner. Use of the Electoral Register is controlled under the Representation of the People Act 2000.

When credit reference agencies receive a search from us they will:

- (a) place a search "footprint" on Your credit file whether or not this application proceeds. If the search was for a credit application the record of that search (but not the name of the organisation that carried it out) may be seen by other organisations when You apply for credit in the future; and
- (b) link together the records of you and anyone that you have advised is your financial associate including previous and subsequent names of parties to the account. Links between financial associates will remain on your and their files until such time as you or your spouse/partner, or other persons with whom you are linked financially successfully files for a disassociation with the credit reference agencies.

Details about you and your payment record under any loan agreement that we enter into with you will be used to help make credit and insurance related decisions about you and members of your household and occasionally for fraud prevention or to trace debtors. We may give information about you and your payment record under any such loan agreement to credit reference agencies, debt collecting agents, our insurers or advisers. We may use a credit scoring or other automated decision-making system.

Records shared with credit reference agencies remain on file for 6 years after they are closed whether settled by you or defaulted. You can contact us for details of the credit reference agencies used by us. You can contact the credit reference agencies operating in the UK and request, for a small fee, that they disclose to you the records that they hold about you. The main credit reference agencies operating in the UK are Experian Ltd, Equifax Ltd and CallCredit plc.

## Transaction history

You are not required to provide us with viewing access to your bank account transaction information (Transaction History) or internet banking access details. You may still be allowed to apply for a loan with us if you do not provide us with this information. However, if you do it will help us make an informed decision about whether we can lend to you.

If you agree that we may access your Transaction History the following provisions shall apply.

Provide Accurate Information. You, agree to provide true, accurate, current and complete information about yourself and your bank accounts (with us or third parties) and you agree to not misrepresent your identity or your account information. You agree to keep your bank account information up-to-date, accurate and complete.

Purposes. We will access your Transaction History using the services of a credit reference agency called Perfect Data Solutions Limited (PDS). We will use your Transaction History to assess your creditworthiness and whether the loan you seek is affordable.

Neither we nor PDS will store or have access to your internet banking credentials, PIN codes or passwords. That information is encrypted in transit and stored by a third party service provider upon their servers in a secure environment outside the EEA.

Third Party Accounts. By agreeing to allow us viewing access to your Transaction History, you authorise PDS and PDS's service providers to access third party sites designated by you, on your behalf, to retrieve information requested by us, and to register to view bank statements over a period of up to 90 days. You agree that PDS and PDS's service providers may, and are instructed by you as your agent and nominated representative, with full power of substitution and re-substitution, for you and in your name, place and stead, in any and all capacities, to access third party internet sites, servers or documents, retrieve information, and use your information, all as described above, with the full power and authority to do and perform each and every act and thing requisite and necessary to be done in connection with such activities, as fully to all intents and purposes as you might or could do in person. This will include the following purposes: copying Transaction History over a 90 day period and storing the copied Transaction History on our servers.

You agree that the Transaction History shall also be used by PDS for credit reference agency purposes and may be taken into account when producing your individual credit score which may be shared with other organisations as part of your credit record.

You acknowledge and agree that when we, PDS or PDS's service providers access and retrieve information and Transaction History from third party sites, this is undertaken as your agent, and not the agent on behalf of any third party (including the bank account provider). You should be aware that third party account providers shall be entitled to rely on this authorisation and agency granted by you. You should also be aware that this service is not endorsed or sponsored by any third party bank account providers. We would recommend that you refer to the terms and conditions of your internet banking provider if you would like more information.

You understand that allowing us to review your Transaction History is at your sole risk.

We are only able to review your Transaction History on an "as is" and "as available basis" as it is made available to us by service providers. It may not be available to us from time to time.

We cannot guarantee that allowing us to review your Transaction History will guarantee the success of your loan application or the rate at which the loan is available.

## Cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Cookies help analyse web traffic or let you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences. A cookie does not give access to the computer or reveal information other than the data you choose to share with us.

### Purpose of using cookies

We use cookies to understand the customer's needs and thereby provide a better service and, in particular for the following reasons

- Internal record keeping
- Improvement of products and services

Furthermore, we use cookies to ensure that the best user experience is provided on the website and display advertisement relevant for the customer. Cookies are used to "remember" when the customer's computer or device access the website and allow web-based applications to respond to the customer individually. The purpose of the web applications is to tailor the required operations for the customer's needs – likes and dislikes – by gathering and remembering information regarding the customer's preferences.

### Used cookies

Listed below are the main cookies that might be used by us when you enter the website.

- Session ID cookie: Enables us to keep track of costumers movement switching between pages in order for the costumer not to be asked repeatedly for information already provided. This type of cookie allows the costumer to proceed through numerous pages of the website quickly and easily without having to authenticate or reprocess each new visited area.
- Load Balancer cookie: This type of cookie is essential in order to ensure that the website loads efficiently by distributing visits across multiple web servers. When distributed the cookie does not contain personal information of the costumer and the duration of use is limited to the costumer's visit on the website, hence the cookie is deleted when the web browser is closed.
- Affiliate tracking cookie: Reports to us that the costumer has reached the website via an affiliate link in order for us to tailor the application experience. Furthermore, this is supplementary achieved by use of a unique URL identifier in the description URL when the costumer initially visits the website.

Cookies may also be set by third parties. However, none of these third parties are able to collect personal data from which they would be able to identify a costumer on an individual basis.

- Web Analytics: These cookies track how visitors use the website in order to improve our services. For example, we use Google Analytics – a popular web analytics service – provided by Google. The customer can find more information regarding how these cookies are used on Google Privacy's site.
- Advertisement tracking: These cookies are used to collect non-personal information regarding the customer's interaction with advertising on other websites prior to them arriving at our website and which advertisements are preferred by the customers. This information helps us to deliver advertisements relevant to the customer's interests and preferences, control the number of times the customer sees a given advertisement and measure the effectiveness of advertisement campaigns.
- Website testing: These cookies allow us to show different versions of the same page or feature on the website and thereafter track to see which version performs best. We use a cookie to manage which version to display when the customer visits the website. The specific variation that the customer will see is randomly chosen and no personal information is stored or tracked through this cookie.

### Cookie control

You can choose to accept or decline all cookies used on the website. Cookies may, according to law not be used unless you have consented hereto. Your explicit consent will be requested in relation to your first use of the website and the applications. Furthermore, you have a right to access, modify or delete personal data disclosed by use of cookies.

Most web browsers automatically accept the use of cookies. However, you may usually modify the browser's settings to decline cookies if preferable. The "help function" within the browser should be able to guide you. Alternatively, you may visit <http://www.allaboutcookies.org/> (available in English, Spanish, German and French). This website contains comprehensive information on how to make special settings on a wide variety of browsers. You may locate details on how to delete cookies from the computer (including those from this visit), as well as more general information regarding cookies.

Please be aware of that modifications or declining of consent may prevent the customer from taking full advantage of the website.

### Storage of cookies

The specific time of storage varies from cookie to cookie. However, the period is restarts whenever the website is visited.

## Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and

such sites are not governed by this privacy policy. You should exercise caution and look at the privacy policy applicable to the website in question.

## Controlling your personal information

You may choose to restrict the use of your personal information for direct marketing purposes in the following ways:

- by indicating your preference at the time you provide the information (by use of the relevant ‘tick boxes’); and
- if you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by writing to Ferratum UK Limited, Suite 318, 25 Goodlass Road, Liverpool L24 9HJ or emailing us at [customercare@ferratum.co.uk](mailto:customercare@ferratum.co.uk).

Please note that due to our systems it may take **[2 weeks]** for us to honour your request and for you to stop receiving marketing materials. With regards to third party marketing, whilst upon receipt of your request to remove you from our third party marketing lists we will cease to share your contact details with third parties, for existing third party materials you receive, you will need to contact the third party directly to unsubscribe from their mailing lists, we do not have the ability to undertake this activity on your behalf.

You may request details of personal information which we hold about you under the Data Protection Act 1998. A fee of £10 will be payable. If you would like to request the personal data which we hold about you please write to Ferratum UK Limited, Suite 318, 25 Goodlass Road, Liverpool L24 9HJ.

If you believe that any information we are holding on you is incorrect or incomplete, please write to or email us as soon as possible, at the above address. We will promptly correct any information found to be incorrect.

You are not required to provide us with viewing access to your bank account transaction information (**Transaction History**) or internet banking access details. You may still be allowed to apply for a loan with us if you do not provide us with this information. However, if you do it will help us make an informed decision about whether we can lend to you.

If you agree that we may access your Transaction History the following provisions shall apply.

**Provide Accurate Information.** You, agree to provide true, accurate, current and complete information about yourself and your bank accounts (with us or third parties) and you agree to not misrepresent your identity or your account information. You agree to keep your bank account information up-to-date, accurate and complete.

**Purposes.** We will access your Transaction History using the services of a credit reference agency called Perfect Data Solutions Limited (**PDS**). We will use your Transaction History to assess your creditworthiness and whether the loan you seek is affordable.

Neither we nor PDS will store or have access to your internet banking credentials, PIN codes or passwords. That information is encrypted in transit and stored by a third party service provider upon their servers in a secure environment outside the EEA.

**Third Party Accounts.** By agreeing to allow us viewing access to your Transaction History, you authorise PDS and PDS's service providers to access third party sites designated by you, on your behalf, to retrieve information requested by us, and to register to view bank statements over a period of up to 90 days. You agree that PDS and PDS's service providers may, and are instructed by you as your agent and nominated



representative, with full power of substitution and re-substitution, for you and in your name, place and stead, in any and all capacities, to access third party internet sites, servers or documents, retrieve information, and use your information, all as described above, with the full power and authority to do and perform each and every act and thing requisite and necessary to be done in connection with such activities, as fully to all intents and purposes as you might or could do in person. This will include the following purposes: copying Transaction History over a 90 day period and storing the copied Transaction History on our servers.

You agree that the Transaction History shall also be used by PDS for credit reference agency purposes and may be taken into account when producing your individual credit score which may be shared with other organisations as part of your credit record.

You acknowledge and agree that when we, PDS or PDS's service providers access and retrieve information and Transaction History from third party sites, this is undertaken as your agent, and not the agent on behalf of any third party (including the bank account provider). You should be aware that third party account providers shall be entitled to rely on this authorisation and agency granted by you. You should also be aware that this service is not endorsed or sponsored by any third party bank account providers. We would recommend that you refer to the terms and conditions of your internet banking provider if you would like more information.

You understand that allowing us to review your Transaction History is at your sole risk.

We are only able to review your Transaction History on an "as is" and "as available basis" as it is made available to us by service providers. It may not be available to us from time to time.

We cannot guarantee that allowing us to review your Transaction History will guarantee the success of your loan application or the rate at which the loan is available.