



Privacy Notice

Summary

Most of what we do as a credit broker involves collecting and using the personal information of our customers.

We want you to be confident that we will keep this information secure and use it both lawfully and ethically, always respecting your privacy.

We also have specific legal responsibilities to protect your privacy. This includes letting you know what personal information we collect about you, what we use it for and on what basis. We always need a good reason for collecting and using your personal information and we have a duty to explain to you your rights in relation to that information. You have the right to know what information we hold about you and to have a copy of it, and you can ask us to change or sometimes delete it.

This privacy notice explains how we use your personal information. It describes what we do (or what we may do) from the moment you ask for a service from us through to providing and billing for that service. It also explains when and how we can use your information for marketing.

But whatever we do with your information, we need a legal basis for doing it. We generally rely on one of three grounds (reasons) for our business processing.

Firstly, if you have requested a service from us, we are entitled to process your information so that we can provide that service to you.

Secondly, if we want to collect and use your information for other purposes, we may need to ask for your consent (permission) and, if we do, that permission must always be indicated by a positive action from you (such as ticking a box) and be informed. You are also free to withdraw your permission at any time. We tend to need permission when what is proposed is more intrusive (for example, sharing your contact details with other organisations so they can market their own products and services to you).

But we do not always need permission. In some cases, having assessed whether our use would be fair and not override your right to privacy, we may come to the view that it falls within the third ground – our 'legitimate interests' to use the information in a particular way without your permission (for example, if we must inform government and law enforcement agencies). But when we do this, we must tell you as you may have a right to object. And if you object specifically to us sending you marketing material, or to 'profiling you' for marketing purposes, we must then stop.

This is all set out in detail in this policy, which focuses more on those items that we think are likely to be of most interest to you. As well as covering processing for business purposes, we give you information on circumstances in which we may have to, or can choose to, share your information.

Our privacy policy

We want you to understand why we need to collect personal information, how we use that information and to feel confident we'll protect it.

We've tried to set this out as simply as possible below.

It applies to the products and services we provide you. It applies to our individual and sole trader customers but doesn't apply to the information we hold about companies or organisations.

It also applies even if you're not one of our customers and you interact with us, such as by generally enquiring about our services or otherwise providing your personal information to us.

If you need to give us personal information about someone else in relation to our products and services, the privacy policy will also apply. And if we need the permission of the other person to use that information, we'll ask you to check they are OK with this.

[What's not included?](#)

This policy doesn't apply to information about our employees or shareholders.

When applying for finance via Igloo Finance Ltd you may have given your information to other individuals and/or organisations. This privacy policy doesn't apply to how those other individuals and/or organisations use your personal information. You should review their privacy policies before giving them your personal information.

[Who are we?](#)

Igloo Finance Ltd is authorised and regulated by the Financial Conduct Authority (FCA). We source finances that are suitable to the requirements you disclose to us. You will not receive advice or a recommendation from us.

[Changes to this policy?](#)

We review our privacy notice regularly. We'll tell you if we change the policies, as set out in the section on how will we tell you about changes to the notice below.

[Accessing and updating how we use your information](#)

If you want to access or update your information you can do so by:

- writing to Igloo Finance, 21 Daylesford Crescent, Cheadle, Cheshire, SK8 1LQ
- by telephoning us on 07836 237010 or
- by email to kiran@igloofinance.com where we will try to resolve your concern at the earliest time possible.

Once we've looked at your request, we'll let you know when you can expect to hear from us.

We'll always try to help you with your request but we can refuse if we believe doing so would have a negative effect on others or the law prevents us. And even though we must complete your request free of charge, we can reject requests if:

- they're repetitive;
- you don't have the right to ask for the information; or
- the requests made are excessive.

If that's the case, we'll explain why we believe we don't have to fulfil the request.

[Want a copy of the information we hold about you?](#)

If you want a copy of the information we hold about you please request this by:

- writing to Igloo Finance, 21 Daylesford Crescent, Cheadle, Cheshire, SK8 1LQ
- by telephoning us on 07836 237010 or

- by email to kiran@igloofinance.com where we will try to resolve your concern at the earliest time possible.

It will normally take us up to one month to get back to you but could take longer (up to a further two months) if it's a complicated request or we get a lot of requests at once.

We'll reply electronically unless you ask us to send the information by post.

Concerned about what we're doing with your personal information?

You can ask us to **correct**, **complete**, **delete** or stop using any personal information we hold about you by:

- writing to Igloo Finance, 21 Daylesford Crescent, Cheadle, Cheshire, SK8 1LQ
- by telephoning us on 07836 237010 or
- by email to kiran@igloofinance.com where we will try to resolve your concern at the earliest time possible.

In some cases, we might decide to keep information, even if you ask us not to. This could be for legal or regulatory reasons, so that we can keep providing our products and services, or for another legitimate reason. We'll always tell you why we keep the information.

We aim to provide our products and services in a way that protects information and respects your request. Because of this, when you delete or change (or ask us to delete or change) your information from our systems, we might not do so straight away from our back-up systems or copies on our active servers. And we may need to keep some information to fulfil your request (for example, keeping your email address to make sure it's not on any contact lists).

Where we can, we'll confirm any changes. For example, we may check a change of address against the Postal Address File, or we might ask you to confirm it.

If we've asked for your permission to provide a service, you can withdraw that permission at any time. It'll take us up to 30 days to do that. And it only applies to how we use your personal information in the future, not what we've done in the past.

Moving to another provider and want to take your personal information?

If we provide you with products and services, or you've said we can use your information, you can ask us to move, copy or transfer the information you have given us. You can ask us to do this by:

- writing to Igloo Finance, 21 Daylesford Crescent, Cheadle, Cheshire, SK8 1LQ
- by telephoning us on 07836 237010 or
- by email to kiran@igloofinance.com where we will try to resolve your concern at the earliest time possible.

We'll send your personal information electronically. And we'll do our best to send it in another format if needed.

We'll always try to help you with your request. But we can refuse if sharing the information would have a negative effect on others, for example because it includes personal information about someone else, or the law prevents us from doing so.

It will normally take us up to one month to get back to you but could take longer (up to a further two months) if it's a complicated request or we get a lot of requests at once.

What information we collect and what we use it for

The personal information we collect depends on the products and services you have and how you use them. We've explained the different ways we use your personal information below.

To provide you with products and services

We'll use your personal information to source finances that are suitable to the requirements you disclose to us.

In assessing your requirements, we may seek information about your personal circumstances and objectives to enable us to identify your needs. It is important that you provide us with accurate and relevant information enabling us to select the most suitable finance.

For us to be able to source a suitable finance personal data will be processed, both manually and by electronic means. The processing is necessary for a contract we have with you, or because you have asked us to take specific steps before entering a contract.

"Processing" includes obtaining, recording or holding information or data, transferring it to other companies associated with us, lenders or statutory, governmental or regulatory bodies for legitimate purposes including, where relevant, to solicitors and/or other debt collection agencies for debt collection purposes and carrying out operations on the information or data.

To provide services to you we may be required to pass your personal information to parties located outside of the European Economic Area (EEA) in countries that do not have Data Protection Laws equivalent to those in the UK. Where this is the case we will take reasonable steps to ensure the privacy of your information.

We may also contact you or pass your details to other companies associated with us to contact you (including by telephone) with details of any other similar products.

The information provided may also contain sensitive personal data, being information as to your physical or mental health or condition; the committing or alleged committing of any offence by you; any proceedings for an offence committed or alleged to have been committed by you, including the outcome or sentence in such proceedings; your political opinions; religious or similar beliefs; sexual life; or your membership of a Trade Union.

You may be assured that we and any company associated with us will treat all personal data and sensitive personal data as confidential and will not process it other than for a legitimate purpose. Steps will be taken to ensure that the information is accurate, kept up to date and not kept for longer than is necessary. Measures will also be taken to safeguard against unauthorised or unlawful processing and accidental loss or destruction or damage to the data.

We use this information to carry out our service and provide products or services to you. If you don't give us the correct information or ask us to delete it, we might not be able to provide you with the product or service you ordered from us.

If you tell us you have a disability or otherwise need support, we'll note that you are a vulnerable customer, but only if you give your permission or if we must for legal or regulatory reasons. For example, if you told us about a disability we need to be aware of when we deliver our services to you, we must record that information so we don't repeatedly ask you about it. We will also record the details of a Power of Attorney we have been asked to log against your account.

Because it is in our legitimate interests as a business to use your information

We'll use your personal information if we consider it is in our legitimate business interests so that we can operate as an efficient and effective business. We use your information to:

- create aggregated and anonymised information for further use;
- detect and prevent fraud; and
- secure and protect our network.

To create aggregated and anonymised data

We may use your personal information to create aggregated and anonymised information. Nobody can identify you from that information and we'll use it to:

- make sure our network is working properly and continuously improve and develop our network and products and services for our customers;
- run management and corporate reporting, research and analytics, and to improve the business; and
- provide other organisations with aggregated and anonymous reports.

We may use the following to generate aggregated and anonymised information.

- Your gender, address and date of birth.
- Information about what service you sought from us.
- If your application for finance does not proceed, information on why it did not.
- Information from associate organisations on how and when finance, if taken, was drawn and repaid.

We have a legitimate interest in generating insights that will help us operate our business.

To develop our business and build a better understanding of what our customers want

This means we'll:

- maintain, develop and test our application process, products and services, to provide you with a better service;
- train our people and associates to provide you with products and services (but we make the information anonymous beforehand wherever possible);
- make and defend claims to protect our business interests; and

We use the following information to do this.

- Your contact details.
- Your financial information.
- Your communications with us, including emails, webchats and phone calls (and any recordings made).
- Information from cookies placed on your connected devices.
- Details of the products and services you've bought and how you use them.

If we use this information for market research, training, testing, defend or bring claims, development purposes, we do so because it is in our legitimate business interests of running an efficient and effective business which can adapt to meet our customers' needs.

To run credit and fraud prevention checks

Before we provide you with a product or service, we'll use personal information you have given us together with information we have collected from other organisations such as Companies House. We use this information to manage our credit risk, and prevent and detect fraud and money laundering. We'll also use these organisations to confirm your identity. We might also share the information with other organisations. We do this because it's in our, and the organisations', legitimate interests to prevent fraud and money laundering, and to check identities, to protect our business and to keep to laws that apply to us.

Details of the personal information that will be used include your name, address, date of birth, contact details, financial information and employment details.

If you don't become one of our customers, we'll keep the result of our credits checks about you if we have a legal obligation and it's in our legitimate interests to help prevent or detect fraud.

Fraud prevention agencies can hold your personal information for different periods of time, and if you are considered to pose a fraud or money laundering risk, your information can be held by us and the organisations we share it with for up to six years.

If you give us false or inaccurate information which we identify as fraudulent, we'll pass that on to fraud prevention agencies. We might also share it with law enforcement agencies, as may the agencies we have shared the information with.

If you tell us you're associated with someone else, we'll link your records together. So you must make sure you have their agreement to share information about them. The agencies we share the information with may also link your records together and these links will stay on your and their files – unless you or your partner successfully asks the agency to break that link.

If we, or a fraud prevention agency, decide that you are a fraud or money laundering risk, we may refuse to provide the services or financing you have asked for, or we may stop providing existing services to you.

The credit reference and fraud prevention agencies will keep a record of any fraud or money laundering risk and this may result in other organisations refusing to provide services, financing or employment to you. If you have any questions about this, please contact us using the details below.

[To meet our legal and regulatory obligations](#)

We might have to release personal information about you to meet our legal and regulatory obligations.

[To law enforcement agencies](#)

Under investigatory powers legislation, we might have to share personal information about you to government and law-enforcement agencies, such as the police, to help detect and stop crime, prosecute offenders and protect national security. They might ask for the following details.

- Your contact details. This includes your name, gender, address, phone number, date of birth, email address, needed to confirm your identity and your communications with us.
- Your communications with us, such as calls and emails.
- Your payment and financial information.
- Details of the products and services you sought.

The balance between privacy and investigatory powers is challenging. We share your personal information when the law says we must, but we have strong oversight of what we do and get expert advice to make sure we're doing the right thing to protect your right to privacy.

We'll also share personal information about you where we must legally share it with another person. That might be when a law says we must share that information or because of a court order.

In limited circumstances, we may also share your information with other public authorities, even if we do not have to. However, we would need to be satisfied that a request for information is lawful and proportionate (in other words, appropriate to the request). And we would need appropriate assurances about security and how the information is used and how long it is kept.

Finally, the section above describes the situations in which your personal information is shared to other organisations, government bodies and law-enforcement agencies. When we share your information with other organisations we'll make sure it's protected, as far as is reasonably possible.

If we need to transfer your personal information to another organisation for processing in countries that aren't listed as 'adequate' by the European Commission, we'll only do so if we have model contracts or other appropriate safeguards (protection) in place.

If there's a change (or expected change) in who owns us or any of our assets, we might share personal information to the new (or prospective) owner. If we do, they'll have to keep it confidential.

How we get your information

This is normally provided by you via your broker, in person or electronically. However, it may also have been provided directly.

Your broker may provide it to us:

- Electronically via email
- Electronically via a, secure, document sharing website
- In person for us to scan and upload to our secure online storage system
- Electronically via our secure Application Portal

Protecting your information and how long we keep it

How do we protect your personal information?

We have strict security measures to protect your personal information. We check your identity when you get in touch with us, and we follow our security procedures and apply suitable technical measures to protect your information.

How long do we keep your personal information?

We'll keep:

- Cases not proceeding, cancelled, declined before completion – 6 years after the date of cancellation.
- Ongoing cases – 6 years from repayment in full date.
- Repaid cases – 6 years after repayment in full date.
- Cases reported to Authorities as suspicious – 6 years from date of reporting.

In other cases we'll store personal information for the periods needed for the purposes for which the information was collected or for which it is to be further processed. And sometimes we'll keep it for longer if we need to by law. Otherwise we delete it.

How to contact us and further details

Got a question about how we use your information?

You can get in touch with our data-protection officer by writing to the address below.

FAO: The Data Protection Officer
Igloo Finance Ltd
21 Daylesford Crescent
Cheadle
SK8 1LQ

If you want to make a complaint on how we have handled your personal information, please contact our data protection officer who will investigate the matter and report back to you. If you are still not satisfied after our response or believe we are not using your personal information in line with the law, you also have the right to complain to the data-protection regulator in the country where you live or work. For the UK, that's the Information Commissioner - <https://ico.org.uk/>.

How will we tell you about changes to the policy?

Our privacy policy might change from time to time we will communicate to all existing customers via email.