

# Privacy Policy

This Privacy Policy is intended to provide you with information about how the Pulse Group gathers and uses your personal data. The Pulse Group Pulse Cashflow Finance Ltd, Pulse Finance Ltd and Pulse Factoring Solutions Ltd all collect and share your data as per the terms of this Policy. All data collected by each company is shared between the Group companies. The Pulse Group is the data controller, who is committed to the protection of your privacy. When we refer to “Pulse”, “we”, “us” or “our” we are talking about all the Companies within the Pulse Group.

We have appointed a data protection compliance officer who is in charge of answering questions in relation to this policy. If you have any questions about it or if you want to use any of *your legal rights*, please contact the data protection compliance officer using the details set out below.

## **Data Protection Compliance Officer Details**

Postal Address: Data Protection Compliance Officer, Pulse Cashflow Finance Ltd, Level 2 Network House, Basing View, Basingstoke. Hampshire, RG21 4HG,

Telephone number: 01256 976029

Email address: [enquiries@pulsecashflow.com](mailto:enquiries@pulsecashflow.com)

All personal information given to us through this website will only be held and used in accordance with this policy, the Privacy and Electronic Communications (E.C. Directive) Regulations 2003 (as amended), the General Data Protection Regulation (EU) 2016/679 or “GDPR” and before 25 May 2018 the UK Data Protection Act 1998

This policy, in conjunction with our Website Terms and Conditions sets out what we may do with any personal data we collect from you, or that you provide to us.

## **Information we collect and store**

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your information by filling in forms, on the telephone, or by corresponding with us by post, fax, email or otherwise. This includes personal data you provide when you:
  - ask us to send information to you;
  - provide us (yourself or on behalf of an organisation) with goods or services or obtain products and services from us; or
  - provide us feedback or contact us about our products or services.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
  - Directors, shareholders and employees at any business or organisation you are associated with;
  - Brokers and Insurers;
  - Recruiters and recruitment agencies;
  - Credit reference agencies;
  - an Agency, for it and others searching its records to use to help make decisions about me/us, my associated businesses or household's members;
  - service providers (including insurers, for underwriting purposes (who may pass it to persons they deal with and to users of their services and give the Pulse Companies information and personal data from their own sources)), to help them carry out their services;
  - legal and tax advisers and persons in relation to any Enterprise Finance Guarantee Scheme or other loan guarantee scheme application, to help provide their services;
  - any person giving (or potentially giving) a guarantee, indemnity or other commitment to any of the Pulse Companies in relation to this matter, to assess their obligations to those Pulse Companies;
  - bankers, financiers or other advisers acting on behalf of any of the Pulse Companies, me/us or any organisation in relation to this matter, so that they can carry out their services to such persons;
  - to assess my/our financial position or consider offering facilities in relation to this matter; and
  - any person where the Pulse Companies are allowed or required to do so by law.

“**Personal data**” means any information about an individual, held by a data controller, from which the controller can identify a specific, living person. It does not include data about a living person that the controller can’t identify.

Some personal data falls into “**Special Categories**” under the GDPR and are given greater protection. These include any personal data revealing your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, and information about your health, as well as genetic and biometric data. Information about criminal convictions and offences is also treated differently from ordinary personal data under the GDPR.

We may collect, use, store and transfer different kinds of personal data about you. The personal data we collect will depend on the relationship you have with Pulse.

If you are:

An employee of Pulse, someone working with us under a contract for services, or someone who applies for employment or work with us, we will provide you with specific privacy information and ask for your consent to use your personal data. We will also collect the following information on you:

- **Identity Data** including first name, last name, title, job title, role or similar identifier, and gender, as well as proof of identity and your right to work in the UK.
- **Contact Data** which may include your address, email address and telephone numbers.
- **Financial Data** to provide pay, benefits and conduct other financial transactions with you.

A business contact, including persons who supply us with goods (including hiring things to us) or services and any contacts at a company or other organisation which does so, and clients (including contacts at companies or other organisations) to whom we supply our products and services as well as the customers and debtors of our clients, we may collect the following types of data on you:

- **Identity Data** includes first name, last name, title, job title, role or similar identifier, and gender.
- **Contact Data** includes your work address, email address and telephone numbers.

- **Financial Data** if we supply or purchase goods and services to or from you as an individual (including some sole traders and partnerships), we may record and retain details of those transactions.

### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested:

- We may not be able to best advise you on the funding facility that is applicable to your needs
- We may not be able to advise on the terms and conditions that would apply to any funding facility offer
- We may not be able to agree, enter in to or perform a contract we have or are trying to enter into with you or a person or organisation associated with you. Our Client may also be placed in breach of the terms of a finance agreement with us.
- If you are an employee, contractor or applicant for a position with us, we may not be able to consider your application, provide you with pay or benefits, or administer a contract for services or contract of employment with you

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for (or any purpose which is not incompatible with those purposes), including for the purposes of satisfying any legal, accounting, or reporting requirements.

### **What do we do with the information?**

We will only use your personal data when the law allows us to. Most commonly, we will use, analyse and assess your personal data in the following circumstances:

- To provide you with information, products or services that you ask for;
- To let you know about other products and services that we think you might be interested in (if you have said that you are happy to be contacted in this way);
- to make financial risk assessments, prevent money laundering, fraud or other wrongdoing;
- making payments to you and/ or your business;
- recovering monies;

- training, product and statistical analysis and development of new products;
- protecting our interests (including the provision of the information to third parties retained by us for them to conduct their services for us);
- To make a decision as to whether to extend credit to a client or prospective client, or whether to vary the terms of our agreements with a client;
- To enter into or negotiate contracts, or to fulfil our legal and regulatory obligations.

In obtaining or storing information about you we may:

- Store and process information about you including on our computers and in any other way;
- Search your record at a credit reference or fraud prevention agency of our choice. Details of our searches may be kept by such agency and may be seen by other organisations that makes searches with the agency;
- Monitor and/ or record telephone conversations with you for training and/ or security purposes;
- Approach you for market research or direct marketing purposes;
- Seek and record any further information that we may require from any source, including banks for any of the purposes set out above;
- Transfer such of the information that we may have to other members of a group of companies of which Pulse is a part; to our financiers; to associates or persons acting on our behalf; to guarantors or indemnifiers and to businesses providing similar services to those of Pulse, all of whom may use such information for any of the purposes set out herein (including transfer within the group of companies). We shall, as far as we are able but without guarantee, seek to ensure that such financiers will always keep control of the information within the terms of this Privacy Policy.

If you do not want your data to be used by us or selected third parties for marketing purposes, please ensure that you select the appropriate option on any of our online forms. You can also notify us at any time if you do not wish your data to be used in this way.

### **Purposes for which we will use your personal data**

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To register you (or your employer or a person or entity to whom you provide services) as a new client.	(a) Identity data (b) Contact data (c) Financial data (for credit purposes)	(a) Performance of a contract with you (b) Necessary for our legitimate interests (c) Your consent
To fulfil our contractual obligations to a client, to you or your organisation or to enforce your or your organisation's obligations to us or to our client, including to  (a) Manage payments, fees and charges  (b) Collect and recover money owed to us	(a) Identity data (b) Contact data (c) Financial data (d) Transaction data	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include:  (a) Notifying you about changes to our terms or privacy policy  (b) Contacting you about products or services we obtain from or provide to you or your employer	(a) Identity data (b) Contact data	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how our products/services are used and received)

<p>To administer and protect our business which may include:</p> <p>a) Financial risk assessment, preventing money laundering, fraud or other wrongdoing;</p> <p>b) Contacting credit reference agencies and making credit related decisions;</p> <p>c) Recovering monies and making payments to you and/ or your business.</p>	<p>(a) Identity</p> <p>(b) Contact</p>	<p>(a) Necessary for our legitimate interests</p> <p>(b) Necessary to comply with a legal obligation</p>
<p>To administer a contract for services or contract of employment between us – we will provide you with further information about this when we collect information from you and during the course of our relationship)</p>	<p>(a) Identity data</p> <p>(b) Contact data</p> <p>(c) Financial data</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to administer the economic relationship between us)</p> <p>(c) Necessary to comply with a legal obligation (related to your work or workplace or our obligations under the law in relation to these)</p>

If you do not select the appropriate option, but wish to do so subsequently, please contact [enquiries@pulsecashflow.com](mailto:enquiries@pulsecashflow.com) and we shall change your preference for you.

### **Disclosure of your information**

We may have to share your personal data with the parties set out below for the purposes set out in the table above.

- External Third Parties as set out in the *Glossary*.
- Specific third parties listed in the table above.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Notice.
- We use a third party to host, manage and support our website. They therefore have access to any data that you submit via this website.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

We don't normally transfer personal information to outside of the European Union but we might in certain circumstances. If we do, we will ensure a similar degree of protection is afforded to it as would be provided under the GDPR.

## **Your rights**

You have the right to make a complaint about our use of your personal data at any time to the Information Commissioner's Office ("**ICO**"). The ICO is the UK's supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)).

If you do have a problem, question or concern about our use of your personal data, we would really appreciate the chance to try to help you before you approach the ICO, so please feel free to contact us in the first instance using the data protection compliance officer's contact details above. You can contact us about data privacy issues in other ways, but if you contact the data protection compliance officer, that will make it much easier for us to help you.

You have rights under data protection law in relation to your personal data. Further information on these rights is set out in the Glossary, below:

*Request access to your personal data.*

*Request correction of your personal data.*

*Request erasure of your personal data.*

*Object to processing of your personal data.*

*Request restriction of processing your personal data.*



*Request transfer of your personal data.*

*Right to withdraw consent.*

If you wish to exercise any of the rights set out above, please contact our data privacy manager.

## **Information Security**

Information that is transmitted via the internet is never completely secure.

We have put suitable protection in place, however any transmission is at your own risk.

## **Encryption technology**

Where necessary we use Secure Socket Layer (SSL) protocol to protect the integrity of data during submission.

We also employ similar technologies and access control methods to keep any stored data secure.

## **Automated Decision Making**

We do not use any fully automated decision making process.

## **Cookies**

Please see our Cookie Policy page for details.

## **Policy Changes**

Any changes to this policy will be posted here and will take immediate effect.

## **Contact**

If you have any questions about this policy or about our use of your personal details then please contact the Data Protection Compliance Officer at [enquiries@pulsecashflow.com](mailto:enquiries@pulsecashflow.com)

## **Glossary**

### **LAWFUL BASIS**

There are a number of different lawful bases for processing your personal data which we may use:

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to provide ABL services the best we can. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data

for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party, or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

**Protecting your vital interests** applies where we would otherwise require your consent to use data but you are physically or legally incapable of giving consent, and processing is to protect your interests – for example, to facilitate urgent medical treatment.

## **THIRD PARTIES**

### **External Third Parties**

Service providers acting as processors based inside and outside the EEA who provide technical, financial, logistical, information technology or other support for our work.

Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors, insolvency practitioners, and insurers based in the EEA and outside of it who provide consultancy, banking, legal, insurance and accounting services.

HM Revenue & Customs, regulators and other authorities based in the United Kingdom who require reporting of processing activities in certain circumstances.

Governments and public authorities in other countries where we carry out filming who require information on our crew and contributors.

## **YOUR LEGAL RIGHTS**

You have the right to:

**Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

# Cookie Policy

By using this website you agree that Pulse Cashflow Finance may use Cookies to improve your experience when using our website.

## Cookies

This Website, in common with many others uses Cookies.

### What are they?

Cookies are text files that can be placed and stored on your computer's hard drive by the Website owner / web server when you visit a website. Cookies enable users to navigate around websites, record which areas have been visited and for how long to help the browsing experience. Where appropriate they also enable us to tailor the website's content to fit the needs of visitors who have accessed the Website in the past. You can find more information about cookies at: [www.allaboutcookies.org](http://www.allaboutcookies.org) and [www.youronlinechoices.eu](http://www.youronlinechoices.eu). For a video about cookies visit [www.google.co.uk/goodtoknow/data-on-the-web/cookies](http://www.google.co.uk/goodtoknow/data-on-the-web/cookies).

### Why do we use cookies?

We use Cookies:

- to monitor and manage website traffic;
- if required as a matter of law or regulation, to protect our or our other customers' rights;
- for login purposes;
- to enable us to remember preferences, track visitors and target adverts; and
- to make the browsing experience on the Website more efficient and enjoyable for the visitor.
- We use both our own (first-party) and partner companies' (third-party) cookies to support these activities.

Allowing us to create a Cookie does not allow us to access your computer and we do not use Cookies to track your internet usage after you leave the Website.

### Can you opt out from permitting cookies?

Yes, users have the opportunity to set their devices to accept all cookies, to notify them when a cookie is issued, or not to receive Cookies at any time. The last of these means that certain personalised services cannot then be provided to that user and accordingly you may not be able to take full advantage of all of the features or services available on our site. The Help function within your browser should tell you how. Alternatively, for more information about how to block cookies and/or delete them, please visit [www.allaboutcookies.org](http://www.allaboutcookies.org).