

## **INTRODUCTION**

This privacy policy applies to personal data held by members of the Allica Group as controllers (as specified below).

We respect your privacy and are committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from), use our app, and use our services, and it will tell you about your privacy rights and how the law protects you.

This privacy policy is provided in a layered format so you can click through to the specific areas set out below. Alternatively, you can download a pdf version of the policy [here](#).

## **1. IMPORTANT INFORMATION AND WHO WE ARE**

### **PURPOSE OF THIS PRIVACY POLICY**

This privacy policy aims to give you information on how Allica collects and processes your personal data through your use of our website and app and your use of our services, including any data you may provide through the website and app when you provide your details for us to contact you, sign up to our newsletter or apply for any of our products or services.

Neither our website nor our app are intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

### **CONTROLLER**

The following entities will act as the controller where you hold a product or service with them:

- a. Allica Bank Limited is the controller and responsible for personal data in respect of banking products and services;
- b. Allica Financial Services Limited is the controller and responsible for personal data in respect of asset finance and growth finance products and services; and
- c. Allica Bridging Finance Limited is the controller and responsible for personal data in respect of bridging finance products and services,

(collectively referred to as "Allica", "we", "us" or "our" in this privacy policy).

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

### **CONTACT DETAILS**

If you have any questions about this privacy policy or our privacy practices, please contact our DPO in the following ways:

Email address: [DPO@allica.bank](mailto:DPO@allica.bank)

Postal address: 4th/5th Floor, 15 Worship Street. London EC2A 2DT

Telephone number: 0330 094 3333 Monday to Friday (excluding Wednesday) 9am-5pm, Wednesday 9.30am-5pm

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

We keep our privacy policy under regular review. This version was last updated in September 2023.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## THIRD-PARTY LINKS

This site may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

## 2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, tax information, gender and (where relevant to the service) your position within your organisation including your position as a Director or shareholder.
- **Contact Data** includes residential address, email address and telephone numbers.
- **Financial Data** includes bank account information and transactional information from your use of our services.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our website and app.
- **Profile Data** includes your username and password, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We will not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data) nor will we collect any information about criminal convictions and offences without your consent, unless the law requires us to.

## IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms and conditions of our products and services, and you fail to provide that data when requested, we may not be able to provide our products and services to you. In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

## 3. HOW IS YOUR PERSONAL DATA COLLECTED?

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

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email, through our website, or otherwise. This includes personal data you provide when you:
  - apply for and use our products or services;
  - create an account on our website or app;
  - request support from our customer services team;
  - subscribe to our service or publications;
  - request we contact you or for marketing to be sent to you;
  - enter a competition, promotion or survey; or
  - give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website and app, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our [cookies policy](#) for further details.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below:
  - Technical Data from analytics and search information providers such as Google, which may be based outside the UK or the EU;
  - Contact, Financial and Transaction Data from providers of technical, payment and delivery services;
  - Identity and Contact Data from data brokers both during and before we provide services to you (where such data brokers have informed you that your information will be shared);
  - Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register; or
  - Identity and Financial Data from professional third-party companies that provide identity check and fraud prevention services

## 4. HOW WE USE YOUR PERSONAL DATA

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

- Where we need to provide our products and services to you i.e. to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email, text message or other instant messaging services. You have the right to withdraw consent to marketing at any time by contacting us directly or using the links in any of our communications.

#### **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.

Please note that we will use any contact information you provide to communicate with you (including via email, SMS, phone or any other instant messaging service) during the course of your relationship with us. Please ensure that your details held by us are accurate and up to date. If you need to update your details, please contact us on 0330 094 3333 or email [customer.services@allica.bank](mailto:customer.services@allica.bank).

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To open an account with us including supporting your application, contacting you about your application, conducting necessary fraud, identity and business checks	(a) Identity (b) Contact (c) Financial	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests
To provide our services to you, including to assess whether you/your business can afford the loan you have applied for	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests
To manage our relationship with you, including to recover any debt	(a) Identity (b) Contact (c) Profile (d) Transaction	(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 customers use our products/services)

	(d) Marketing and Communications	
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical (d) Financial (f) Transaction	(a) Performance of a contract with you  (b) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and investigate fraud money laundering and other crimes, and in the context of a business reorganisation or group restructuring exercise)  (b) Necessary to comply with a legal obligation
To deliver relevant website and app content and online advertisements to you (including on social media and around the internet) and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, app, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To reach out to you, send you information about, or talk to you about our products and services and to inform you about how we can better support your business banking needs using information from data brokers and other publicly available data sources	(a) Identity (b) Contact	Necessary for our legitimate interests (to identify prospective customers, market our services and grow our business and inform our marketing strategy)

## **TAX**

If we believe that you have tax obligations in another country, we may disclose personal information of yours with those tax authorities, or with HM Revenue and Customs, who may share the information with other tax authorities.

## **CREDIT REFERENCE AGENCIES AND FRAUD PREVENTION AGENCIES**

We may search, use and share records held by domestic and international credit reference agencies and fraud prevention agencies (including CIFAS, TransUnion and Experian), as well as our own internal records to:

- Confirm your identity and prevent fraud or money-laundering
- Check your credit history and income details for affordability
- Check details on applications for credit and credit related to other facilities

Credit reference agencies may check your details against any particulars on any database (public or otherwise) to which they have access in order to verify your identity.

Credit reference agencies keep a record of all searches, including those used to confirm your identity. Credit reference agencies also keep a record of whether or not your application is successful and whether you've missed any payments. Missing payments can negatively impact your credit rating so it is best to discuss this with us first before you make an application.

We will inform the credit reference agency if you miss or are late on any payments. The agency may then make your personal information available to other organisations so that they can make a decision about you or the account holder.

For more information on how the credit reference agencies that we use work and to see their information notices, click on the links below:

- [TransUnion](#)
- [Experian](#)

Before we provide services or financing to you, we undertake checks for the purposes of preventing fraud and money laundering and to verify your identity.

If we, or a fraud prevention agency, determine that you pose a fraud or money-laundering risk, we may refuse to provide the services or financing you have requested or we may stop providing existing services to you. A record of any fraud or money-laundering risk will be retained by the fraud prevention agency and may result in others refusing to provide services, financing or employment to you. We, and fraud prevention agencies, may also enable law enforcement agencies to access and use your personal data to investigate and prevent crime.

Where we identify that you have been a victim of fraud, we will share your information with fraud prevention agencies to alert other financial institutions of the need to conduct additional verification on future applications.

Fraud prevention agencies can hold your personal data for different periods of time, and if you are considered to pose a fraud or money laundering risk, your data can be held for up to six years. For more information on how fraud prevention agencies that we use work and to see their information notices, click on the link below:

- [CIFAS](#)

## **MARKETING**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. You can manage your marketing preferences here by email [customer.services@allica.bank](mailto:customer.services@allica.bank) or by calling us on 0330 094 3333.

## PROMOTIONAL OFFERS FROM US

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products and services may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or opened a bank account with us or used any of our products or services and you have not opted out of receiving that marketing.

## THIRD-PARTY MARKETING

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

## OPTING OUT

You can ask us or third parties to stop sending you marketing messages at any time by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences, by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of your use of our products and services.

## COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly. For more information about the cookies we use, please see our [cookies policy](#).

## CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 5. DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data with the parties set out below for the purposes set out in the table above. If you want more detail you can contact us.

- Third parties acting on our behalf, including our service providers and agents who help us manage our products and services;
- Credit referencing agencies to check your credit rating;
- Relevant government bodies, authorities and regulatory bodies in order to comply with our regulatory and reporting obligations;
- IT providers/hosted IT solution providers to enable us to provide our products and services to you;

- Debt collection and debt purchase agencies in the event we need to collect arrears from you or your company;
- Other financial service companies and fraud prevention agencies to help protect you against, prevent, detect and prosecute unlawful acts and fraudulent behaviour;
- Our professional advisors (lawyers, accountants and consultants);
- Any other parties connected with your account e.g. guarantors, joint account holders, fellow company directors;
- Social-media and internet advertisement companies to assist in deploying advertising on the internet or social media platforms (such as Meta, LinkedIn, Microsoft and Google) as well as a) analysis of the effectiveness of our campaigns and b) identifying others to whom our services are relevant
- Market research companies to assist us in improving our products and service delivery;
- 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 privacy policy;
- If you have cards linked to your account, we will share transaction details with our card providers. They may transfer this information overseas to deal with transactions, resolve disputes and/or for statistical purposes;
- Anyone else where we have your consent, you ask us to share it or where it is required by law.

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.

## **6. INTERNATIONAL TRANSFERS**

We may transfer your information to organisations (for example, our suppliers) in other countries (including to other Allica group companies) located outside the UK and the European Economic Area (“EEA”). Whenever we transfer your personal data out of the UK or the EEA, we ensure a similar degree of protection is afforded to it by having a contract in place to make sure the recipient protects the data to the same standard as is required in the UK.

When we transfer information to countries outside of the UK and European Economic Area, we only do so where:

- the UK has decided that the country or the organisation we are sharing your information with will protect your information adequately;
- the transfer has been authorised by the relevant data protection authority if required; and/or
- we have entered into a contract with the organisation with which we are sharing your information (on terms approved by the UK) to ensure your information is adequately protected.

Please contact us if you want further information on the specific mechanism used by us (for example, if you would like to obtain a copy of the relevant contractual clauses that cover the transfer of your data internationally) when transferring your personal data out of the EEA.

## **7. DATA SECURITY**

We have put in place appropriate technical and organisational security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. Please remember however that no transmission using our app or website can ever be guaranteed as secure, therefore, please note that we cannot guarantee the security of any personal information which you transfer via our app or websites.



We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 8. DATA RETENTION

### HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for up to seven years after they cease being customers.

In some circumstances you can ask us to delete your data see Your Legal Rights below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## 9. YOUR LEGAL RIGHTS

You have certain rights in accordance with applicable data protection law, these rights are:

- **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. You also have the right to object where we are processing your personal data for direct marketing purposes. 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:
  - If you want us to establish the data’s accuracy.
  - Where our use of the data is unlawful but you do not want us to erase it.
  - 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.
  - 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.
- **Not to be subject to a decision based solely on automated processing**, including profiling, which produces legal effects concerning you or similarly significantly affects you, except in specific cases provided by law. Depending on the products or services you use, we may process your personal information by automated means. What this means is that we will use computer software or predictive analysis to automatically evaluate your personal or business's circumstances to identify risks or to predict certain outcomes in relation to a lending product you are applying for. For example, we may make automated decisions about you/your business that relate to lending to make an informed decision on whether to lend to you and how much which helps us lend responsibly. Our credit scoring methods are regularly tested to ensure they remain fair, effective and unbiased. Where we make an automated decision about you or your business, you have the right to obtain human intervention, express your point of view and obtain an explanation of the decision and challenge it.

If you wish to exercise any of the rights set out above, please contact us.

You can find more information about your rights at the Information Commissioner's website: [www.ico.org.uk](http://www.ico.org.uk)

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