

PRIVACY POLICY

Salix Finance Ltd (**We**) are committed to protecting and respecting your privacy and confidentiality and protecting your personal data.

This policy (together with our [Terms of Website Use](#) and any other documents or terms referred to in it) sets out the basis on which any data we collect from you, or that you provide to us, will be processed by us and tells you about your privacy rights and how the law protects you. Please read the following carefully to understand our views and practices regarding your data and how we will treat it. It is important that you read this policy together with any other privacy notice or fair processing notice 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 policy supplements the other notices and is not intended to override them. This policy is provided in a layered format so you can click through to the specific areas set out below.

By visiting <https://www.salixfinance.co.uk/> (**our site**) and continuing to use our site, you are accepting and consenting to the practices described in this policy.

This website is not intended for children and we do not knowingly collect data relating to children.

For the purpose of the General Data Protection Regulation (2016/679) (the GDPR) and to the extent we are processing any personal data (within the meaning of the GDPR), the data controller is Salix Finance Limited.

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this policy. If you have any questions about this policy, including any requests to exercise your legal rights, please contact the data privacy manager using the following email address craig.mellis@salixfinance.co.uk or alternatively please call on using the following telephone number 020 3102 6900 or write to us at 75 King William Street, London EC4N 7BE.

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). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

YOUR DUTY TO INFORM US OF CHANGES

It is important that the personal data we hold about you is accurate and current. Please keep us informed if any of your personal data changes whilst we hold your personal data.

YOUR INFORMATION

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).

HOW IS YOUR PERSONAL DATA COLLECTED

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

- **Information you give us.** This is information about you that you give us by filling in forms and applications on our site or by corresponding with us by phone, e-mail or otherwise. It includes information you provide if you register on our site, when you make an application on our site, upload any documents on our site, request marketing be sent to you, give us feedback and when you report a problem with our site. The information you give us may include data relating to your identity such as your name ("**Identity Data**"). We may also collect contact data such as contact address, email address and telephone numbers ("**Contact Data**").

- **Information we collect about you.** With regard to each of your visits to our site we will automatically collect technical data about you, such as:
 - the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
 - information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to call our customer service number ("**Technical Data**")
- **Information we receive from other sources.** This may include information we receive about you if you use any of the other websites we operate or the other services we provide. In this case we will have informed you when we collected that data if we intend to share that data internally and combine it with data collected on this site. We will also have told you for what purpose we will share and combine your data.
- We may receive personal data about you from selected third parties and public sources including, but not limited to, the Education and Skills Funding Agency or other relevant government department).
- We may also receive profile data such as usernames, passwords, preferences, feedback and survey responses ("**Profile Data**"), along with usage data such as how you use our website and services ("**Usage Data**").
- We may also receive your preferences in receiving marketing from us and your communication preferences ("**Marketing and Communications Data**").
- We may also receive details about services you have obtained from us ("**Transaction Data**").
- We may also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does 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 policy.

USE OF YOUR INFORMATION

We will only use your personal data when the law allows us to. We may use information held about you as detailed in the table below. We have also identified the legitimate interests 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:

Purpose/Activity	Type of Data	Lawful basis for processing including basis of legitimate interest
To process and review your application(s)	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing & Communications (f) Transaction	Performance of a contract with you Necessary for our legitimate interests (to enable our business to function and to provide you with the products and services requested from us)
To administer the Salix Funding Programmes and to carry out our obligations under it	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing & Communications (f) Transaction	Performance of a contract with you Necessary for our legitimate interests (to enable our business to function and to provide you with the products and services requested from us)
To carry out our obligations arising from any contracts entered into between you and us, and to provide you with the information, products and services that you request from us	(a) Identity (b) Contact (c) Transaction (d) Profile (e) Usage (f) Marketing & Communications	Performance of a contract Necessary for our legitimate interests (to enable our business to function and to provide you with the products and services requested from us)

<p>To notify you about changes to any or our terms or use of the site</p>	<p>(a) Technical (b) Profile (c) Identity (d) Contact (e) Usage (f) Profile (g) Marketing & Communications</p>	<p>Performance of a contract. Necessary to comply with a legal obligation.</p>
<p>To ensure that content from our site is presented in the most effective manner for you and for your computer</p>	<p>(h) Technical (i) Profile (j) Identity (k) Usage (l) Profile</p>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</p>
<p>To respond to any feedback you send us, if you have asked us to provide such feedback</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing & Communications</p>	<p>Performance of a contract</p>
<p>To administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes</p>	<p>(a) Technical (b) Identity (c) Profile (d) Usage (e) Contact (f) Marketing & Communications</p>	<p>Necessary for our legitimate interests (to keep our website up to date and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To improve our site to ensure that content is presented in the most effective manner for you and for your computer</p>	<p>(a) Technical (b) Identity (c) Profile (d) Usage</p>	<p>Necessary for our legitimate interests (to keep our website up to date and relevant, to develop our business and to inform our marketing strategy)</p>

As part of our efforts to keep our site safe and secure	(a) Technical (b) Identity (c) Profile (d) Usage	Necessary for our legitimate interests (to keep our website secure and to protect your personal data) Necessary to comply with a legal obligation.
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Where we have received information from other sources, we will combine this information with information you give to us and information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

We will only use your personal data either:

- where we need to do so to perform a 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; or
- where we have received your express informed consent to do so (this will be used where we obtain your consent to receive direct marketing communications via email). **You have the right to withdraw consent to marketing at any time by contacting us.**

YOU HAVE THE RIGHT TO OBJECT TO YOUR PERSONAL DATA BEING PROCESSED.

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 perform the contract we have or are trying to enter into with 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.

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.

WHERE YOUR DATA IS STORED

We may transfer your personal data outside the European Economic Area (EEA) in certain circumstances.

Whenever we transfer your personal data out of the EEA, we always ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate

level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.

- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see European Commission: EU-US Privacy Shield.

Please Contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

KEEPING YOUR DATA SECURE

Unfortunately, the transmission of information via the internet is not completely secure. We cannot guarantee the security of your data transmitted to our site and any transmission is at your own risk. Once we have received your information, we will use procedures and security features to try to prevent unauthorised access.

We won't share your information with any other organisations for direct marketing.

DISCLOSING YOUR INFORMATION

You agree that we have the right to share your information with:

- any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006;
- selected third parties including, but not limited to:
 - to the Department for Business, Energy and Industrial Strategy, the Scottish Government or the Welsh Government (or other relevant government department) or any other third party funder as part of the handling of any applications made via our site;
 - to the Department for Business, Energy and Industrial Strategy (or other relevant government department) in order to meet regulatory or legislative requirements, such as state aid transparency requirements;
 - to third party technical assessors, if a project meets certain criteria, as part of the handling of any applications made via our site;
 - to the Welsh Government, as part of the handling of any Welsh applications made via our site;
 - to third party payment processors who will process direct debit collections for us once an application has completed, as part of the handling of any applications made via our site; and
 - to analytics and search engine providers that assist us in the improvement and optimisation of our site.

We will disclose your information to third parties:

- in the event that that your obligations hereunder are to be transferred to another counterparty, in which case we will disclose your data to the prospective counterparty; or
- if we are under a duty to disclose or share your data in order to comply with any legal obligation, or in order to enforce or apply our [Terms of Website Use](#) and other agreements; or to protect the rights, property, or safety of Salix Finance Ltd, our users, or others. This includes exchanging information with other companies, government departments and organisations for the purposes of fraud protection and credit risk reduction.

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.

YOUR RIGHTS IN RELATION TO PERSONAL DATA

The GDPR gives you the right to access personal information you supply in relation to an individual. You can find out what information we hold about you, and ask us not to use any of the information we collect in accordance with the GDPR. You can exercise this right at any time by contacting us at info@salixfinance.co.uk

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

LINKS TO AND FROM OTHER SITES

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any data to these websites. Please note that clicking on links to other websites or enabling connections may allow third parties to collect or share data about you.

If you come to our site from another website, we may receive information about you from the other website. Again, you should read the privacy policy of the website you came from to find out more about this.

COOKIES

You can set your browser to refuse all or some cookies, or to alert you when websites set or access cookies. Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

For detailed information on the cookies we use and the purposes for which we use them see our [Cookie Policy](#)

DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised manner, altered or disclosed. In addition, we limit access to your personal data to employees, agents, contractors and third parties who have a legitimate purpose for processing your data and who are subject to a duty of confidentiality. They will only process your personal data on our instructions. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulatory of a breach where we are legally required to do so.

DATA RETENTION

We will only retain your personal data for as long as is necessary to fulfil the purpose we collected it for, unless we are required by law to retain it. To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. Details of retention periods for different aspects of your personal data can be obtained on request by contacting us. In some circumstances you can ask us to delete your data. In some circumstances we may 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.

MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

You can ask us to stop sending you marketing messages at any time by contacting us at any time.

CHANGES TO OUR PRIVACY POLICY

Any changes we make to our Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our Privacy Policy.

CONTACT

Questions, comments and requests regarding this Privacy Policy should be addressed to info@salixfinance.co.uk

This policy was last updated on 21st May 2018