

Privacy Policy

PRIVACY POLICY

This privacy notice is to let you know how we look after your personal information.

This includes what you tell us about yourself, what we have learnt about you as a customer and any choices you have given us about any future contact.

This notice explains how we do this and informs you about your privacy rights and how the law protects you.

1. WHO WE ARE

We are B2B APM LTD and we can be contacted using the following details:

Address: 1-3 Gloucester Road, Bristol, BS7 8AA.

Telephone: 0117 992 7545

Email address: info@b2bapm.com

We are registered with the Information Commissioner's Office (ICO) and can be both the Data Controller and Data Processor of the information you provide.

Data Controller: Determines the way in which personal data is used

Data Processor: Processes the data under the instruction of the Controller

2. OUR LEGAL GROUNDS FOR HANDLING YOUR PERSONAL DATA

The UK's data protection laws allow us to use your personal data provided we have a lawful basis to do so. This includes sharing it in certain circumstances, as described below.

We consider we have the following reasons (legal bases) to use your personal data:

- **Performance of contract with you:** we need to use your personal data to be able to successfully legally contract with you.
- **Compliance with our legal obligations:** we need to use your personal data so as to comply with certain legislation such as financial crime legislation.
- **Legitimate interests:** these are our business and commercial reasons for using your data, which we have balanced against your interests. We have certain legitimate interests in using your data which are not outweighed by your interests, fundamental rights or freedoms. These legitimate interests are to help prevent and detect financial crime, fraud and money laundering, to promote responsible lending, to support our tracing, collection and litigation procedures and to assist our compliance with the legal and regulatory requirements placed upon us.
- **Your consent:** we may also use your data when you consent to it. You can withdraw this consent at any time, in which case we will cease to use it, unless we have a right and a need to continue processing it for one of the other reasons set out above.

More information on how we use your personal data and for what purposes is set out below.

3. WHAT PERSONAL DATA IS COLLECTED ABOUT YOU AND HOW WE COLLECT IT

We may collect data about you from the following sources:

Data provided by you:

- **When you apply for our products and services and throughout the course of our dealings:** for example, your name, postal address, email address, IP address, telephone numbers, date of birth, bank account details, equipment requirement details, home ownership details, reason for borrowing, your assets and liabilities, details of your proof of identity documentation, proof of address documentation, evidence of additional equity available and evidence of any other business interests
- **When you talk to us:** for example on the phone, or in person including call recordings and voice messages. We may monitor or record calls with you to check we have carried out your instructions, to resolve queries or disputes, to improve the quality of our service or for regulatory or fraud prevention purposes.
- **In writing:** for example letters, emails, texts and other electronic communications.
- **Online:** for example when you use our website or mobile app.
- **In financial reviews, for renewals and in any surveys etc.**

Data we collect when you use our services:

- **Transaction data:** for example what sort of products you are selecting, the length of term, the types of asset you are looking at financing, business type and geographical location
- **Payment data:** for example, the amount, origin, frequency, history and method of your payments
- **Usage and profile data:** for example, the profile you create to use our website and mobile app and how you use it. We gather this data from the devices you use, using cookies and other software

Data provided by third parties:

- **Data from persons that introduce you to us: for example product suppliers, financial advisers, agents, finance providers or other third parties**
- **Data from credit reference agencies**, most likely to be either Experian, Equifax, CallCredit or Creditsafe
- **Data from fraud prevention agencies**
- **Publicly available information:** for example, from the land registry, companies house, the electoral register, other information available online or in the media, including social media
- **Data from your employers and medical data where relevant***
- **Data from your representatives where relevant:** for example your legal and financial advisers such as lawyers and accountants**

*In certain circumstances we may ask you to provide us with medical information if we determine that this is a requirement for us to either proceed to enter into the agreement with you or once we have entered into the agreement with you determine that the same is necessary for whatever reason. Full details as to the reason for our request and how we will use this information will be given to you at the time should we request such information from you. You will be asked to consent to the provision of this information.

**We may also require a statement signed by an independent qualified accountant as to your financial worth which may include information such as your gross and net worth, your assets and liabilities and information as to your available collateral or security. You will be asked to consent to the provision of this information.

4. WHY PERSONAL DATA IS COLLECTED BY US

We collect personal data from you for many reasons including:

Activity	Legal basis	Legitimate interest
<ul style="list-style-type: none"> • Exercising our contractual rights and obligations 	<ul style="list-style-type: none"> • Contract performance 	N/A
<ul style="list-style-type: none"> • Pre contractual checks • Post contractual checks • Customer service • Account management 	<ul style="list-style-type: none"> • Legal duty • Contract performance • Consent • Legitimate interests 	<ul style="list-style-type: none"> • Verifying identity • Maintaining up to date records • Seeking consent where relevant • Business efficiency • Risk management
<ul style="list-style-type: none"> • Product analysis and development • Business development • Profiling, statistical and analytics 	<ul style="list-style-type: none"> • Contract performance • Legitimate interests 	<ul style="list-style-type: none"> • Product development • Business efficiency • Risk management
<ul style="list-style-type: none"> • Regulatory and legal requirements • Managing risk • Business management and operations, including record keeping 	<ul style="list-style-type: none"> • Legal duty • Contract performance • Legitimate interests 	<ul style="list-style-type: none"> • Business compliance • Business efficiency • Risk management
<ul style="list-style-type: none"> • Recovery of money owed to us • Reporting to credit reference agencies and fraud prevention agencies 	<ul style="list-style-type: none"> • Legal duty • Contract performance • Legitimate interests 	<ul style="list-style-type: none"> • Business compliance • Business efficiency • Risk management
<ul style="list-style-type: none"> • Marketing • Research 	<ul style="list-style-type: none"> • Consent • Legitimate interests 	<ul style="list-style-type: none"> • Business development • Brand management • Business efficiency

From time to time we may contact you to ask for your consent to use your personal data for other purposes. Your personal data may also be used for other purposes where required or permitted by law.

When we and fraud prevention agencies process your personal data, we do so on the basis that we have a legitimate interest in preventing fraud and money laundering, and to verify identity, in order to protect our business and to comply with laws that apply to us. Such processing is also a contractual requirement of the services or financing you have requested. We, and fraud prevention agencies, may also enable law enforcement agencies to access and use your personal data to detect, investigate and prevent crime. 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. In order to process your application we may supply your personal information to credit reference agencies (CRAs) in which case they will give us information about you, such as about your financial history. We do this to assess your creditworthiness and product suitability, check your identity, manage your account, trace and recover debts and prevent criminal activity. When CRAs receive a search from us they may place a search footprint on your credit file that may be seen by other lenders and used to assess applications for finance from you and members of your household. The CRA may also share your personal information with other organisations. We may also continue to exchange information about you with CRAs on an ongoing basis, including about your settled accounts and any debts not fully repaid on time. CRAs will share your information with other organisations. Your data will also be linked to the data of your spouse, any joint applicants or other financial associates. We can provide you with the identities of the CRAs and the ways in which they use and share personal information upon your request. More information about CRAs and how they use your personal data is available at [CRAIN](#).

From time to time we may provide your information to our partners, third parties and customer service agencies for research and analysis purposes so that we can monitor and improve the services (or as the case may be) we provide. We may contact you by post, e-mail or telephone (or as required) to ask you for your feedback and comments on our services (or as the case may be).

From time to time we may also contact you about our other goods or services that may be of interest to you.

5. WHEN PERSONAL DATA IS SHARED

Your personal data may be shared with our lenders, agents, lawyers and any of our or their subsidiary or associated companies before, during and after your agreement with us.

We may also use organisations to perform tasks on our behalf including information technology service providers, repossession agents, banks and transportation companies who we will then be sharing your personal data with and who may also process and retain your data both before, during and after your agreement with us.

Any of these third parties may contact you by post, e-mail or telephone (or as required). They may use your personal data to communicate with you on any matter relating to the management and conduct of your account or agreement with us.

We may also share your personal data with CRAs, fraud prevention agencies, law enforcement agencies, regulators and other authorities, the UK Financial Services Compensation Scheme, any agent that you have given us authority to communicate with and persons you ask us to share your data with, companies that we introduce you to, market researchers tracing and debt recovery agencies and customer service agencies for the purposes set out above. These agencies and firms may also share your personal data with others.

Your personal data may also appear on the V5, service history, manufacturers record, insurance documentation or within receipts in relation to the asset which may be shared by us with third parties who store, transport, advertise, sell, express interest in purchasing, own or later hire the asset.

If, in the future, we sell, transfer or merge all or part of our business or assets, including the acquisition of other businesses, we may share your data with other parties. We will only do this if they agree to keep it safe and private and to only use it in the same ways as set out in this notice.

Any personal information shared will be sent securely via encrypted email or via recorded postal delivery. We suggest you send personal information via a secure method i.e. telephone or post if you do not have email encryption available.

6. TRANSFER OF PERSONAL DATA OUTSIDE THE EUROPEAN ECONOMIC AREA (“EEA”).

We may transfer your personal data to recipients located in countries outside of the EEA which may not have data privacy laws equivalent to those in the EEA. In those instances, we will take all necessary steps to protect your personal data in accordance with applicable data privacy laws.

7. FRAUD PREVENTION

If we, or a fraud prevention agency, determine that you pose a fraud or money laundering risk, we may refuse to provide the services and 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 agencies, and may result in others refusing to provide services, leasing, financing or employment to you.

If you fail to provide us with data we require, this may delay or prevent us from entering into a contract with you and or complying with our obligations. Depending on the importance of the data, it may mean that we are entitled to terminate an agreement with you.

If you have any questions about the above, please contact us on the details above.

8. WHAT CHOICES AND RIGHTS YOU HAVE

Your personal data is protected by legal rights, which include your right to:

- Object to our controlling and processing of your personal information (“*right to object*”)
- Object to our sharing of your personal information with others or with certain organisations (“*right to object*”)
- Request that your personal information is corrected if inaccurate or that its processing be restricted
- Request that your personal information is erased* (“*right to erasure*” or “*right to be forgotten*”)
- Request what personal information we currently control and/or process in relation to you
- Request access to your personal information
- Request we move, copy or transfer your personal information (“*data portability*”)

* Please note that this action may restrict us in providing any service/product to you and there may be a reason why we need to keep your information.

Please contact info@b2bapm.com if you would like to request any of the above or if you would like any further information on how your information is used, how we maintain the security of your information and your rights in relation to it.

How to Complain

If you are unhappy about how your personal data has been used by us please also contact info@b2bapm.com and we will send to you our Complaints Policy.

You also have a right to complain to the Information Commissioner's Office which regulates the processing of personal data. You can contact them at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, on 0303 123 1113 or by email to casework@ico.org.uk See also <https://ico.org.uk/global/contact-us/>

9. HOW LONG PERSONAL DATA IS KEPT

We will normally retain your personal data for a period of 6 years from the date your agreement ends. Where you hold or are associated to multiple agreements (including loans), the 6 years is effective from the date of closure of the last account held or associated to you.

Where you did not proceed with an application or were declined for credit, we will normally retain your personal data for a period of 6 months from the date of last activity.

Under certain circumstances this period may vary if we consider it necessary for good operational or commercial reasons, or in order to meet other legal obligations.

10. COOKIES

Our website uses cookies and similar technologies, which are small files or pieces of text that download to a device when a visitor accesses a website or app. For information about viewing the cookies dropped on your device, visit [The cookies WordPress uses](#).

These functional and required cookies are always used, which allow WordPress, our hosting platform, to securely serve this website to you.

These analytics and performance cookies are used on this site, as described below, only when you acknowledge our cookie banner. We use analytics cookies to view site traffic, activity, and other data.

11. DIRECT MARKETING

We can only use your personal information to send you marketing information if we have your consent or a legitimate interest. A legitimate interest will usually be a commercial reason which cannot be used unfairly against you. If you change your mind after providing your consent, you are able to do so by contacting us.

12. CALL RECORDING

We may monitor and or record phone calls to ensure that we have carried out your instructions correctly, to resolve queries and complaints, for regulatory purposes, to help detect or prevent fraud or other crimes, improve service and to help monitor and train our staff. Our lawful reason for this under data protection law is our legitimate interests or in some cases compliance with legal obligations.