

# Shermin Finance Limited

## Privacy Notice

Shermin Finance is committed to protecting your privacy in everything we do and ensuring that you are always clear on how your personal information is used. We understand that your privacy and the security of your personal information is extremely important. As a company we are committed to protecting your privacy when you provide your details for our services or interact with us in any way.

This Privacy Notice explains what personal information we collect, what we do with it, our lawful basis for processing and how we secure your information. We will also explain your rights in relation to the personal information we hold about you and how you can exercise your rights or register a complaint.

Shermin Finance Limited is the data controller. Our registration number with the Information Commissioner's Office is Z7026139.

Contact details: Shermin Finance Ltd, HomeServe Membership Ltd, Cable Drive, Walsall. WS2 7BN

Telephone: 03302 30 30 30

Email: [privacy@sherminfinance.co.uk](mailto:privacy@sherminfinance.co.uk)

### **Personal information we collect:**

We collect information we require to provide our brokering services to retailers, financing services to consumers and due diligence and audit services on behalf of lenders. We also receive the personal data of consumers we assist with complaints and insurance claims.

#### **Retailers**

We currently collect and process the following personal information of retailers who apply for our brokering services: name and surname, address (physical/postal), telephone number, email address, driver's licence or passport if we require proof of identity, registration numbers with regulatory and professional bodies, bank account details, date of birth, notes relating to due diligence and audits, and VAT records.

#### **Consumers**

We currently process the following personal information of consumers: name and surname, address (physical/postal), telephone number, email address, application number, notes relating to complaints and insurance claims and data pertaining to your health if you disclose to us that you are in receipt of certain financial benefits, such as disability benefit. We also collect information regarding finance applications submitted through our platform.

#### **Lenders**

We currently collect and process the following personal information of lenders: name and surname, address (physical/postal), telephone number, email address, Companies House number, and notes relating to agreements and contracts.

### **Vendors**

We currently process the following personal information of vendors who provide services to us: name and surname, address (physical/postal), telephone number, email address, bank and payment details.

You are under no obligation to provide any information but if you do not, it might be impossible for us to provide our brokering and other services.

### **How we obtain and use personal information:**

Most of the personal information we process was provided directly by you for one of the following reasons:

- You applied for our brokering services through our website or in person.
- You submitted a consumer finance application through our platform.
- You agreed to receive marketing communications from us.
- You are providing contracted services to us as a vendor.
- You provided information to complete our due diligence process to establish your eligibility for lender financing.
- To enable us to complete the contractually required audits to assess ongoing suitability for financing services.
- To respond to enquiries and correspondence.

Information is provided to us by lenders to enable us to deal with complaints about service received from retailers or to support insurance claims. In some instances, your information was provided to us by retailers submitting consumers finance applications on your behalf.

### **Lawful basis for processing personal information:**

As a company we provide different services and our lawful basis for collecting and using the personal information described in this Privacy Notice will depend on the type of information and the specific context in which we collect and use it.

We will normally collect and process your personal information for our brokering services to meet our contractual obligations. In some cases, the processing of your personal information may be based on our legitimate business interests as a company but not when overridden by your data protection interests or fundamental rights and freedoms. We carry out balancing and necessity tests to ensure that your rights are protected when we rely on our legitimate interests as a business for processing. We may also have a legal obligation to collect personal information to meet our obligations to comply with financial and regulatory requirements.

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

We use personal information in the following ways as part of our business operations:

- To provide our contracted brokering and consumer finance services.
- To promote our company and services.
- To contact you following your enquiry or to reply to questions.
- To deal with complaints from consumers.
- To provide information required by law.
- To carry our due diligence and auditing obligations.

### **Sharing of Information:**

We share the information provided to us by retailers applying for financing services with the lenders we work with. Information gathered during audits and the due diligence process we are required to conduct is also shared with lenders to establish the suitability of applicants. In most cases the sharing will be related to the contracted services we provide to you or on behalf of our clients.

Information provided by consumer finance applicants will be shared with one or more of the following lenders for consideration:

Tandem Bank Limited, (<https://www.tandem.co.uk>) BNP Paribas (<https://www.creation.co.uk>), Duologi ([www.duologi.com](http://www.duologi.com)) Propensio ([www.propensio.co.uk](http://www.propensio.co.uk)), JN Bank UK Ltd (<https://portal.jnbank.co.uk/>) V12 Retail Finance Limited (<https://www.v12retailfinance.com/>), Snap Finance Ltd (<https://snapfinance.co.uk/>),

We also share data within the HomeServe Group and with professional advisors. Data might also be shared with regulatory authorities to comply with our obligations.

### **Data Transfers:**

We use processors who are based outside of the United Kingdom. When data is transferred outside of the United Kingdom, we ensure that appropriate safeguards such as the UK Addendum to the EU Standard Contractual Clauses or International Data Transfer Agreements are included in contracts.

### **How we store your information:**

We have put in place appropriate organisational and technical measures to meet our legal obligation to ensure the security of your personal information. We use industry standard security and firewalls. We maintain physical, electronic and procedural safeguards in connection with the collection, storage and disclosure of your information.

We keep personal information for only as long as necessary for our business purposes and to meet our legal and contractual obligations. In most cases, our retention period will come to an end when we no longer require your information and will be deleted six years after your relationship with us ends. The data of consumers who used our platform to apply for funding will be deleted from our systems one month after the completion of the applicable project. In some instances, we are required to retain data for longer to meet regulatory requirements. We dispose of information by deleting it from all our systems and securely disposing of paper files.

Please email [privacy@shermifinance.co.uk](mailto:privacy@shermifinance.co.uk) to obtain more information about our retention periods.

## **Cookie Notice:**

We use cookies on our website to enhance your browsing experience and to generally ensure the efficient running of the website. Cookies are small files normally consisting of letters and numbers which store information on the user's device. They are used in numerous ways, such as to analyse visitor traffic to our website through Google Analytics and to help the website load faster. We also have links on our website to payment provider websites and to our social media sites. Some of the cookies on our website are classified as non-essential cookies which you can decline. Personal information we collect when you visit our website includes information about your device and IP address.

## **Your data protection rights:**

Under data protection law, you have individual rights pertaining to your personal information, including:

- Your right of access - You have the right to ask us for copies of your personal information we hold.
- Your right to rectification - You have the right to ask us to correct information you think is inaccurate or complete information you think is incomplete.
- Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances. We maintain a retention policy and will inform you if we are not able to delete your information immediately.
- Your right to restriction of processing - You have the right to ask us to restrict the processing of your information in certain circumstances.
- Your right to object to processing - You have the right to object to the processing of your personal data in certain circumstances.
- Your right to data portability - You have the right to ask that we transfer the information you gave us to another organisation, or to you, in certain circumstances.
- Rights in relation to automated decision making and profiling. Our company performs credit checks but decisions about eligibility are done by our directors and are not based on automated decision making. Consumers who use our platform to submit finance applications will be directed to the platforms of the individual lenders who might use automated decision making.

You do not need to pay a fee for exercising your rights. If you make a request, we are required to respond to you within one month unless there are reasons why it will take longer to collect the information you requested. If that is the case, we will inform you. In some cases, we will require you to provide proof of your identity if we are unable to confirm your identity through other information we hold about you. This is required to ensure the security of the personal information we hold and to meet our legal obligations. Please email [privacy@sherminfinance.co.uk](mailto:privacy@sherminfinance.co.uk) if you want to exercise any of your rights.

## **How to complain:**

In the first instance please send complaints to: [privacy@sherminfinance.co.uk](mailto:privacy@sherminfinance.co.uk).

You can also write to: Data Protection Officer, HomeServe PLC, Group Legal, Cable Drive, Walsall, WS2 7BN

If you are not happy with the response you receive, you can send your complaint to the Information Commissioner's Office (ICO): Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Helpline number: 0303 123 1113, [www.ico.org.uk](http://www.ico.org.uk)

Changes to our policies may result in periodic changes to this Privacy Notice. We recommend that you check back regularly, we will notify you of any changes through our website. The date released will always be listed below.

Last updated: 1<sup>st</sup> May 2024