

Privacy Policy & Notice for Grantco LTD

This privacy notice provides information on how Grantco Ltd, its subsidiaries, and any 3rd party providers collect, use, secure, transfer, and share your information. Grantco trading address is Wilson House, 2 Lorne Park Road, Bournemouth, BH1 1JN

1.1. Types of Information Collected, typically but not limited to:

Salary First Name **Employers Phone number** Surname **Previous Name** Residential Status Photographic ID Address ID **Phone Numbers Accountant Details Landlord Details** Previous employers **Employers Address** Date of birth **Payslips Present Address Bank Statements** Nationality **Email Address Marital Status Bank Details** Middle Name NI Number Solicitor details

1.2. Methods of Collection

In the general conduct of business, Grantco collects information relevant to;

- yourself
- spouse/partner/family member
- Employers
- "Trusted" sources include:
- Government / Land / Police registers
- Credit / Default Agencies
- Financial Institutions (Banks, Building Societies, Loan Agencies, Credit Card companies)
- Through consent to third parties disclosing information about you
 to us that they have collected. Such information will generally be managed via the use of any of our
 standard forms, over the Internet, via email, or through a telephone conversation with you. We may
 also collect personal information through our affiliates or suppliers.

You may choose to submit information

directly to us via several forms of communication, including:

- through Grantco and affiliates' websites
- in response to marketing or other communications
- through social media
- by signing up for a Grantco product or services
- through participation in an offer, program or promotion
- in connection with an actual or potential business or employment relationship with Grantco

You may also agree to third parties disclosing information about you to us that those third parties have collected.

Our service providers and partners collect certain information by using automated means, such as cookies and web beacons when you interact with our advertisements mobile applications or visit our websites, pages, or other digital assets. The information we collect in this manner may include IP address, browser type, operating system, referring URLs and information on actions taken or interaction with our digital assets.

We may use third-party web analytics services on our websites and mobile apps. The analytics providers that administer these services use technologies such as cookies

and web beacons to help us analyse how visitors use our websites and apps.

"Your Rights and Choices" section of this Privacy Notice specifies your ability to limit the usage of the information collected.

- 1.3. Purposes of Collection Generally, we will collect, use and hold your information for the purposes of:
- Processing payments/transactions including Accounting, Authorisation, Clearing, Chargebacks, Auditing, Billing, Reconciliation, Collection, Complaints, Enquiries, Credit Checks and related dispute resolution activities
- Protecting against and preventing fraud, money laundering, tax evasion, claims, and other liabilities and managing risk exposure and agent /franchise quality, integrity, compliance and security of business processes
- Operating, monitoring, evaluating and improving our products, services, websites, mobile applications, other digital assets and business
- Developing new products and services
- Managing communications, assessing effectiveness and optimising advertising
- Enforcing Grantco's "Terms of Use" and other legal rights as may be required by applicable laws and regulations or requested by any judicial process or governmental agency having or claiming jurisdiction over Grantco or its affiliates
- The functionality of our websites, mobile applications and other digital assets
- Complying with industry standards and Grantco policies

1.4. Lawful basis of processing

Grantco processes your information under the following basis:

- Performance of a contract: where you enter into a contract with
 Grantco and we need to process your information as part of this contract
- Legitimate interests: some information is processed by Grantco as part of its legitimate interests,
 which include fraud, risk assessment, due diligence, network and information security, suppressions
 and managing opting out of communications, profiling, direct marketing, monitoring, web
 analytics, cloud storage, acquisitions, updating customer details, and core products and services
 provided by the data controller
- Public interest: some information is processed in accordance with public interest
- Consent: where we process information under consent, we will seek your clear and unambiguous consent prior to processing your data
 - 1.5. Information We Share We do not sell or otherwise disclose personal information we collect about you, except as described in this Privacy Notice or as indicated via a consent process at the time the data is collected. We share the information we collect with, but not limited to:
- Vetted affiliates / Financial Institutions
- Vetted affiliates for the purpose of conducting consumer research
- Formally contracted service providers to perform services on our behalf:
- Hosting Datacentres, Infrastructure, Applications (Development / Support), Cloud Services (Software as a Service – SaaS, Platform as a Service – PaaS, Infrastructure as a Service
 - laaS)
- Helpdesk, Call Centres etc. We contractually require these service providers to safeguard the privacy
 and security of personal information they process on our behalf and authorise them to use or
 disclose the information only as necessary to perform services on our behalf or comply
 with legal requirements
- Law firms
- Auditors
- Credit agencies, Land Registry Office, Her Majesty's Revenue and Customs (HMRC),
- legally, to prevent harm or financial / reputation loss, for investigation of suspected or actual fraudulent or illegal activities. Website features can be accessed where we partner with other entities that are not affiliated with Grantco. These include social networking, geo-location tools etc. are operated by third-parties (indicated appropriately) who may use or share personal information in accordance with their own privacy. Policies. It is recommended that you review the third parties' privacy policies if you use the relevant features. Grantco reserve the right to transfer your information in the event of a sale or transfer (wholly or partially) of our business or assets, with reasonable efforts for the acquirer to protect / use your information consistent with our Global Privacy Notice. You can exercise your rights to contact the acquiring entity with questions concerning the protection and processing of your information.
 - 1.6. We will keep information for a reasonable amount of time in order to perform the purposes listed above. We only keep your information for as long as necessary. We generally keep personal information for 6 years after last contact with you. However, Grantco will reserve the right to keep information for longer if we feel that this is in the legitimate interests of Grantco.
 - 1.7. International Data Transfers, Grantco may transfer the personal information collected about you to recipients in countries other than the country in which the information was originally collected. Those countries may not have the same data protection laws as the country in which you initially provided the information. When we transfer your information to other countries, we will protect

that information as described in this Privacy Notice or as otherwise disclosed to you at the time the data is collected (e.g. via program specific privacy notice).

- 1.8. Profiling For the purposes of business conduct, enhancement, identification of fraud, money laundering and other potential unauthorised activities, Grantco may engage in profiling activities via direct use or anonymisation of sensitive personal information.
- 1.9. Direct Profiling Direct profiling is engaged for the fair and lawful purposes, to provide Grantco the ability to enforce Grantco "Terms of Use", legal reporting as may be required by applicable laws, regulations, policies/standards or requested by any judicial process or governmental agency having or claiming jurisdiction over MIH or its affiliates; including, but not limited to:
- Background checks for customers
- Financial Viability analysis/reports
- Business partner/customer portfolio position, performance, risk positions
- Anti-money laundering
- Tax reporting
- Credit defaulting / exposure
 - 1.10. Indirect Profiling Indirect profiling via anonymisation of personal information is also used for preparing and furnishing aggregated data reports showing anonymised information, including, but not limited to, the following:
- Compilations, analyses, analytical and predictive models and rules, and other aggregated reports to advise our partners/affiliates and service institutions, retailers and other customers regarding past and potential future patterns of service usage,
 - spending, fraud, and other insights that may be extracted from this data.
- Compiling and communicating promotional and marketing information about products and services that Grantco, affiliates and other organisations that we have affiliations with have and
 - that may be of interest to you.
- Conducting market research
- Facilitating our internal business operations, including the fulfilment of any legal requirements.
 - 1.11. Your Rights and Choices Your rights regarding the sensitive/personal information we maintain about you enable you to exercise choices about what personal information we collect from you, how we use that information, and how we communicate with you.
 - 1.12. Access and Correction You may have the right to:
- obtain confirmation that we hold personal information about you
- request access to and receive information about the personal information we maintain about you
- receive copies of the personal information we maintain about you
- The right to access personal information may be limited in some circumstances by local law requirements. To exercise these rights, please see the details below of requirements:
 - 1.13.1 Update and correct inaccuracies in your personal information If you feel that the information we hold about you is incorrect or inaccurate, you can contact us outlining the information you feel is

incorrect or inaccurate If we refuse to correct your personal information, we will provide you with a written notice that sets out the reasons for our refusal (unless it would be unreasonable to provide those reasons) and provide you with a statement regarding the mechanisms available to you to make a complaint. We will provide you with access to the information we hold about you.

- 1.13.2. Object to the processing of your personal information If you would like to object to any processing of your information by Grantco, you can contact us outlining what processing of information you would like to object to.
- 1.13.3 Have the information blocked, anonymised or deleted. If you would like Grantco to delete, block or anonymise information we hold about you, you can contact us outlining what information you would like deleted, blocked or anonymised. To update your preferences, ask us to remove your information from our mailing lists or submit a request to access, Update, correct or delete your personal information, please contact us as specified in the "How To Contact Us" section below.
- 1.14. Opting out of processing You can opt out of the collection of personal information by automated means e.g. when visiting our website or visiting third-party websites and interacting with our adverts, by using the Cookie Consent tool displayed in the website (the browser you use may provide options on how to opt out of receiving certain types of cookies). However, without cookies, you may not be able to use all of the website features and/or online services. Grantco operates a cookie policy. Some of our service providers and partners may collect information about your online activities over time and across third-party websites to customise and target our adverts. You can at any time tell us not to send you marketing communications by:
- email
- unsubscribing via the "unsubscribe link" within the marketing emails you receive from us, or
- contacting Grantco as indicated below.
 - 1.15. Withdrawal of consent If we obtain your information by consent you have the right to withdraw any consent you previously provided to us. If we process your information under legitimate interest you can object at any time on legitimate grounds, to the processing of your personal information. Grantco will apply your preferences going forward. Doing so will mean that you cannot take advantage of certain Grantco and affiliate products, services and promotions. The right to consent removal may be limited in some circumstances by local law requirements and you will be informed appropriately.
 - 1.16 How to Contact Us / Complaints and Feedback If you:
- believe we fall short of your expectations in processing your personal information
- wish to make a complaint about a breach of your personal information, applicable privacy laws / principles or have a concern about Grantco privacy practices
- would like access and/or update information or preferences you provided to us, Please email us at: Hello@grantco.co.uk
- Or write to us at Wilson House, 2 Lorne Park Road, Bournemouth, BH1 1JN: To assist us in responding to your request, please give full details of the issue. We attempt to review and respond. to all complaints within a reasonable time.

If we cannot for lawful reasons, complete your request, we will explain this to you to the extent that we lawfully can.

1.17 How We Protect Personal Information The security of your personal information is very important and Grantco is committed to protecting the information we collect. We maintain administrative, technical and physical safeguards designed to protect the personal information you provide or we collect against accidental, unlawful or unauthorised destruction, loss, alteration, access, disclosure or use. We use SSL encryption on a number of our websites from which we transfer certain personal information Grantco stores personal information only for as long as it is necessary for the fulfilment of the purpose for which the personal information was collected, unless otherwise required or authorised by applicable law. We take measures to destroy or permanently de-identify personal information if required by law or if the personal information is no longer required for the purpose for which we collected it.

1.18 Review and Updates

This privacy notice may be updated from time to time and you should review it on a regular basis.

