



LCF Privacy Policy

Lancashire Community Finance is committed to protecting your privacy. This Privacy Policy sets out details of the information that we may collect from you and how we may use that information.

Who are we?

In this Privacy Policy, references to “we” or “us” are to:

Lancashire Community Finance (IPS) Ltd. Authorised by the Financial Conduct Authority FRN 659275. Registered Society No. IP29863R.

And

Lancashire Community Finance (Trust) Limited
Authorised by the Financial Conduct Authority FRN 658913.
Reg Charity No. 1106165. Company No 5011192

Our registered office is at 4, Fleet Street Preston PR1 2UT

We are registered on the Data Protection Register under registration number Z884046X

We are a data controller for the purposes of the General Data Protection Regulation (GDPR) which came into force on 25th May 2018. This means we are responsible for how we hold and use the personal information we hold about individuals.

What is personal data?

Personal data is any information relating directly or indirectly to any living person

What data do we collect and hold about you?

We only collect and hold information that is necessary to enable us to provide the services you request. You may provide this information in person or by post, telephone, fax, e-mail, SMS. In particular we may collect the following data from you which are defined as ‘personal data’

Identity Data includes your name, gender, date of birth, National Insurance number, marital status, title, number of dependants, driving licence, marriage certificate, passport, Inland Revenue notice of coding, utility bills, tenancy agreements, and mortgage statements



Contact Data includes e-mail address, postal address telephone numbers, work address and emergency contact details.

Financial Data includes job details, financial details, salary slips, bank statements and any other information you provide to us in connection with your loan application or for monitoring purposes.

Marketing and communications data. We will never share your data with third parties for marketing purposes. We want to be able to contact you in the future to update you on our products and services and for this reason we ask you to provide your communications preferences.

Third party Data. We may receive information about you from third parties (such as credit reference agencies [\(see below\)](#) who are legally entitled to disclose that information.

Finally when you visit our website, we may collect details of your computer's internet protocol address, which is automatically collected by our web server, and other information about your use of the website, such as log-in, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform. We also collect standard internet log information and details of visitor behaviour patterns, in order to find out things such as the number of visitors to the various parts of the site and we study these patterns in a way which does not identify anyone.

Special Categories of Personal Data

We may also collect special category personal data such as physical and mental health details, or information relating to your racial or ethnic origin. We will only collect this information with your explicit consent.

Credit Reference Agencies (CRAs) and Fraud Prevention Agencies (FPAs)

By applying for a loan with Lancashire Community Finance, you agree that we may use your personal information to make credit reference checks and for fraud checking and prevention purposes.

In order to process your application we will supply your personal information to the CRA and it will give us information about you. This will include information from your credit application and about your financial situation and financial history. We do this to assess creditworthiness and product suitability, verify the accuracy of the data you have provided to us, check your identity, manage your account, trace and recover debts and prevent criminal activity (including fraud and money laundering), and ensure that any offers provided to you are appropriate to your circumstances.



Our search will create “a search footprint”. CRAs provide us with both public (including the electoral register) and shared credit, financial situation and financial history information and fraud prevention information. They will add to their record about you, details of our search and your application. This will be seen by other organisations that make searches and, together with other information about you and those with whom you are linked financially, may be used to make credit decisions about you and those with whom you are linked financially.

It is important that you provide us with accurate information. We may check your details with FPAs. If false or inaccurate information is provided and fraud is identified, details will be passed to FPAs and other organisations to prevent fraud and money laundering. These records will be shared with other organisations and may be used and searched by us and them, for example, to consider applications for credit and credit related services, or other facilities, for you and any associated person; check details on proposals and claims for all types of insurance; trace debtors, recover debts and manage your account(s); check details of job applicants and employees. Law enforcement agencies may access and use this information. We may make periodic searches at CRAs and FPAs to manage your account with us. We and other organisations from other countries may access and use the information recorded by CRAs and FPAs.

The identities of the CRAs, their role also as fraud prevention agencies, the data they hold, the ways in which they use and share personal information, data retention periods and your data protection rights with the CRAs are explained in more detail [here](#).

What are the legal grounds for processing your personal information?

Under data protection laws we can only process your personal data for certain reasons (including when we share it with other organisations). We have set out in the table below 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 may process your personal data for more than one lawful ground, depending on the specific purpose for which we are using your data.

Purpose/Activity	Type of data	Lawful basis for processing
To identify you	Identity Data. Third Party Data	Contractual. Legitimate Interests
To assess your ability to repay a loan from LCF	Identity Data. Financial Data.	Contractual. Legitimate Interests
To pay the loan funds to you and collect loan repayments	Identity Data. Financial Data	Contractual. Legitimate Interests
To send you periodic statements for your loan account	Identity Data	Contractual

To contact you to advise you of missed loan repayments and other repayment issues	Identity Data	Contractual
Updating our records to reflect a change in your circumstances	Identity Data. Financial Data. Third Party Data	Contractual. Legitimate Interests
Monitoring of anonymised statistical information	Racial/ethnic origin. Physical and mental health details	Your consent which you can withdraw at any time by contacting us using the contact details above
Re arrange your loan repayments if you are unable to meet the agreed repayments	Financial Data	Contractual. Legitimate Interests
Offer you debt advice /counselling.	Financial data	Contractual

For processing based on your consent, you have a right to withdraw your consent. You can do this by contacting us at the address above. The consequence might be that we cannot take into account special categories of personal data such as about your health or if you have special circumstances which may require us to tailor the ways we communicate with you. If withdrawing your consent has any other consequences we will advise you at the time you make your request.

Who will we share your information with?

We will only share your personal data when required to do so by law or to fulfil our contract with you. This may include:

HMRC, law enforcement agencies, Information Commissioners Office, Financial Conduct Authority and other organisations as and when we are required to do so by law.

Credit reference agencies and fraud prevention agencies

Companies providing our back office and IT support services

How long will you keep the information for?

We will normally keep your personal information for as long as you are a customer of LCF and for 6 years afterwards



Do you have to provide your personal information to us?

We are unable to provide you with a loan without having personal information about you. Your personal information is required:

1. Before you can enter into a loan contract with us
2. During the life of your loan
3. To satisfy legal requirements

If we already hold some of the personal information that we need, for instance if you are already a customer, we will not need to collect it again when you make a new application. In cases where providing some information is optional we will make this clear during the application process

Is your personal information transferred outside the UK or EEA?

No. All our processing is undertaken within the UK. If the situation should change we would ensure that suitable safeguards were in place to provide the same level of protection for your data.

Is your information safe?

We take the security of your data very seriously. We will ensure that all information provided to us is kept secure using appropriate technical and organisational measures and we have procedures in place to minimise the effects of any data breach. In the event of a data breach we will liaise with you and the ICO as necessary

What are your rights under the GDPR?

You have several rights under the GDPR which can be exercised in certain circumstances. These include:

The right to be informed about the collection and use of your data.

The right of access to your data

The right to request correction of inaccurate personal data.

The right to request erasure of your data in certain circumstances

The right to request that processing of your data is restricted or suppressed in certain circumstances



The right to data portability

The right to object to data processing carried out on the basis of our or a third party's legitimate interests

Rights in relation to automated decision making and profiling

Right to withdraw any consent given

If you have any queries I respect of any of your rights please let us know. Further information is also available at the [Information Commissioner's website](#).

How to get a copy of your personal information (Data Subject Access Request)

You can obtain a copy of the personal information held by us by writing to us at 4, Fleet Street, Preston PR1 2UT. We will ask you to provide verification of your identity before we release the information to you. We will respond to your request as quickly as possible but in no more than 30 days.

Contact Details

If you have any queries or concerns about this privacy notice or how we handle the personal information referred to in it please contact our Data Protection Officer, Elaine Rimmer on 01772 556877 or by e mail at elainerimmer@lancashirecommunityfinance.co.uk. If you have any complaints about the processing of personal data referred to in this privacy notice, you have the right to make a formal complaint to the Information Commissioners Office (ICO). Further information can be found at www.ico.org.uk