

DATA PROTECTION NOTICE

GENERAL DATA PROTECTION REGULATION 2016

GRENKE is committed to full compliance with the requirements of the EU General Data Protection Regulation. GRENKE will therefore follow procedures to ensure that all employees, partners or other servants or agents of GRENKE (collectively known as data users) who have access to any personal data held by on behalf of GRENKE, are fully aware of and abide by their duties under the General Data Protection Regulation.

OUR LAWFUL BASIS

GRENKE regards the lawful and appropriate treatment of personal information as very important to its successful operations and essential to maintaining confidence between GRENKE and those with whom it carries out business. We therefore collected and process data for the following lawful basis;

a. To fulfil contractual obligations

Data is processed in order to provide financial services contracts to our customers or in order to take measures at the request of you prior entering into a contract. The purpose of the data processing will be geared in the first instance to the product itself (e.g. leasing and factoring) and may encompass assessment, consultation and the execution of transactions. For further details of the purposes for which data is processed, please refer to the relevant contract documents and terms and conditions.

b. As part of balancing interests

If necessary, we will not only process your data for the actual fulfilment of the contract, but also to protect our own legitimate interests and those of third parties, especially:

– Consultation and data sharing to determine credit and default risks

For the purposes of checking any credit or default risks, and to defend ourselves against any criminal acts, we provide Dun & Bradstreet Limited (Registered Office at the Point, 37 North Wharf Road, London. W2 1AF) and CoCredo Ltd (Registered Office at Missenden Abbey, London Road, Great Missenden, Buckinghamshire HP16 0BD) with data concerning the request and the applicant. Experian and CoCredo will make the data saved about you available to us through direct electronic mail provided that we have given convincing evidence that our interest in this is legitimate.

The credit agencies will process the data received and use this to create a profile (scoring), in order to provide their contractual partners in the European Economic Area and in Switzerland and, where necessary, other third party countries (provided there is an adequacy decision from the European Commission for this) with information so they can assess the creditworthiness of natural persons, among others.

Furthermore, we will send personal data collected for the request for, execution and ending of this business relationship as well as data for behaviour not in compliance with the contract or for fraudulent behaviour to Francis Wilks & Jones LLP, 6 Coldbath Square, London, EC1R 5NA and PDT Solicitors LLP (Registered Office at Premier House, 36-48 Queen Street, Horsham, West Sussex RH13 5AD).

For detailed information as described in Article 14 GDPR regarding activities undertaken by the credit agencies, please refer to the information provided about the respective agencies using the following links:

For Dun & Bradstreet, go to www.dnb.com

For CoCredo, go to www.cocredo.co.uk

For PDT Solicitors, go to www.pdt.co.uk

For Francis Wilks & Jones LLP go to www.franciswilksandjones.co.uk

- Checking business needs for the purposes of direct sales approaches and marketing opportunities
- Assertion of legal claims and defence during legal disputes
- Guaranteeing IT security and safeguarding IT operations at our company
- Prevention and clarification of criminal acts

- Building and plant safety measures (e.g. access control)
- Measures to guarantee domestic authority
- Business management measures and measures to develop products and services

c. Based on your consent

If you have given us your consent to process personal data for certain purposes (e.g. marketing), it will be lawful to do this processing based on the consent you have given. Consent can be withdrawn at any time. This also applies to the withdrawal of declarations of consent received before GDPR comes into force. Withdrawal of the consent does not affect the legality of the data processed up until the withdrawal.

d. Based on statutory provisions or public interest

If we are required to meet various legal requirements (i.e. the provisions of the Banking Act 2009, Money Laundering Act, tax laws) and banking supervisory specifications (e.g. the European Central Bank, the European Banking Authority, the Bank of England and Financial Supervisory Authority).

DATA COLLECTION

We collect personal data that we receive from individuals through our business relationship. These individuals may include current, past and prospective customers as well as suppliers and our GRENKE employees. We also – if required to provide our service – collect the personal data that we are permitted to obtain from publicly accessible sources (e.g. lists of debtors, land register, the register of companies and associations, the press, the internet) or data sent to us from our sales partners or other third parties (e.g. a commercial credit agency) with good authorised cause.

GRENKE will, through management and use of appropriate controls, monitoring and review; (i) collect personal data in the most efficient and effective way to deliver services, (ii) collect personal data for such purposes as are described as our lawful basis and (iii) ensure information collected is accurate.

The personal data of relevance is as follows:

- Personal details (name, address, date and place of birth)
- Contact details (telephone number, email address)
- Authentication data (e.g. specimen signature)
- Order details (e.g. payment order)
- Data collected to fulfil our contractual obligations (e.g. sales data from payment transactions)
- Information about their financial situation (e.g. credit information, scoring/rating data, origin of assets)
- Sales data (including advertising scores), documentation data (e.g. minutes of consultation)
- Factoring (not leasing) requires the name and address of the bank, account number and sort code into which payments can be made on receivables.

Individuals must provide us with the personal data necessary for us to enter into and maintain a business relationship and to fulfil the requisite contractual obligations associated with this, or when law requires us to collect it. Without this data, we will usually not be able to enter into a contract.

More specifically, the Money Laundering Act requires us to verify an ID document before we enter into a business relationship, and to find out and record an individuals name, place and date of birth and address when doing so. Individuals have to notify us immediately of any changes occurring during our business relationship.

SPECIAL CATEGORY DATA

GRENKE acknowledges the distinction between personal data and special category data. Any data of this nature encountered will require specific consent in order for GRENKE to collect or process the information and take action on the situation present.

DATA PROCESSING

GRENKE will need to process and use information about individuals with whom it is in a business relationship in order to operate and carry out its business function. Reasons for processing data includes to check the creditworthiness, to confirm identity and age, to prevent fraud and money laundering, to fulfil requirements set by tax law, and to assess and manage risks. In addition;

a. Automated decision-making

To establish and maintain the business relationship, we do not use fully automated decision-making. If we use this procedure in individual cases, we will provide separate information about this, if required by law.

b. Profiling

We automate the processing of data in some cases with the purpose to evaluate certain aspects of personality (profiling). We use profiling in the following cases (for example):

- Due to legal and regulatory requirements, we are duty-bound to fight money laundering, the funding of terrorism and criminal acts putting our assets at risk. Data evaluation (including during payment transactions) is also carried out. These measures have also been put in place to protect you.
- We use scoring when we are assessing your creditworthiness. This process calculates the probability of a customer meeting their payment obligations in accordance with the contract. This calculation will factor in earning capacity, outgoings, existing liabilities, employment, employer, length of service, experience from previous business relationships, repayment of previous loans, as well as information from credit agencies. Scoring is based on an accredited mathematical statistical procedure that has been tried and tested. The score values calculated help us to make decisions on product sales and are factored into routine risk management procedures.
- We use evaluation tools to provide you with targeted information and advice about products. These make it possible to communicate in a way that meets your needs.

DATA PROCESSING ON WEBSITE

Unless indicated otherwise, we only process your data on our website in order to process your request or because of legitimate interests we have:

a. Usage data

Any time you access a page or a file, generic data is saved automatically in a log file via this procedure. The data is saved for system-related and statistical purposes only, or as an indicator of criminal acts in certain exceptional cases.

We use this data to improve our websites and to present you with content reflecting your interests. No usage data is combined with personal data as part of this process. If you decide to send us your data, this data will be recorded during the input process.

For security reasons, we will save your IP address. This can be retrieved if there is a legitimate interest for this.

We do not create a browser history. Data is not forwarded to third parties or otherwise evaluated unless there is a legal obligation to do so.

The following data set is stored from every processing request:

- The end device used
- The name of the file accessed
- The date and time of the request
- The time zone
- The amount of data transmitted
- Notification of whether the request was successful
- Description of the type of web browser used
- The operating system used
- The page visited before
- The provider
- The user's IP address

GC Factoring Ltd

Registered office: 2 London Square, Cross Lanes, Guildford, GU1 1UN. Tel. +44 1483 401 740 E-Mail service@grenkefactoring.co.uk
Company registration number: 08336352 VAT No: 154085123

b. Contact us / Requests

If you contact us, using contact forms, we will save your data for the purposes of processing your request and for when further correspondence is necessary. All data is deleted after your request has been processed. This does not include data for which there is a legal requirement to keep the data.

c. Registration

We only use the data given to us during registration to gain access to our portal. An email address, Username and Password is collected during the registration process.

d. Use of Cookies

To make visiting our websites an appealing experience and to make it possible to use certain features, we use cookies on different pages. Cookies are small text files that are stored on your end device. Some of the cookies that we use are deleted again at the end of the browser session, i.e. after you close your browser (session cookies). Other cookies remain on your end device and enable us or our partner companies to recognise your browser again the next time you visit (persistent cookies).

Cookies do not make it possible to access other files on your computer, or discover your email address.

Most browsers have settings that mean they accept cookies automatically. If the standard settings are saved for cookies in your browser, all processes will run unnoticed for you in the background. You can change these settings, however. You can adjust your browser so that you are informed when cookies are set and can make individual decisions about accepting them, or generally rule out cookies in certain cases. If you restrict cookies, some individual features of our website may be restricted too.

e. Range analysis using Piwik

We have a legitimate interest (i.e. an interest in the analysis, optimisation and cost-effective operation of our website) in the use of Piwik, open-source software designed to statistically evaluate user access.

Your IP address is shortened before it is saved. Piwik uses cookies that are saved on the users' computers and makes it possible to analyse use of the online service by the users. Pseudonymous user profiles may be created for the users during this. The information generated by the cookie about your use of this online service is stored on our server and not forwarded to third parties. You will be provided to opportunity to opt out of this process.

f. Embedded YouTube videos

In line with our legitimate interests, we embed YouTube videos on our website; these videos are stored on www.youtube.com and can be viewed directly on our website.

If you visit the website, YouTube is notified that you have opened the relevant page of our website. This happens regardless of whether or not you have a YouTube account that you have logged into. If you are logged into Google, your data will be attributed to your account directly. If you do not want the data to be associated with your YouTube profile, you must log out before you click on the button. YouTube stores your data as a user profile and uses them for the purposes of marketing, market research and/or customising its website. In particular, your data is evaluated this way in order to provide personalised advertising and notify other users of the social network of your activity on our website. You are entitled to object to the creation of these user profiles; you must contact YouTube if you wish to exercise this right.

See the privacy policy for more information on the scope and purpose of data collection and processing by YouTube. <https://policies.google.com/privacy>

Google also processes your personal data in the USA and has subjected itself to the EU-US Privacy Shield.

DATA PROCESSING ON THE CUSTOMER PORTAL

At <https://factoring.grenkeonline.com/> we offer our customers access to the customer portal, where

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customers or their designated employees can use the following functions.

a. Registration

We collect the following data for the registration process; form of address, first name, last name, e-mail address, telephone number, User name and Password.

Other data can be entered on a voluntary basis. As a customer, you can grant designated employees their own access to your user account in our customer portal.

b. Functions

We offer the following functions in our customer portal:

- Live view of pending purchases for the day
- A list of all your receivables transferred to factoring, and their processing status
- Entry and editing of your customers' master data, and requests for limits
- Interface for transferring new receivables to factoring
- Document archive

c. Data processing

We will use the data entered for registration or use of the functions if this is needed to perform the respective function of the customer portal, to perform the contract, or conduct pre-contractual activities, pursuant to request of the data subject (Art. 6 (1)(b) GDPR).

If needed, we process the data on file apart from the actual performance of the contract, in order to protect the legitimate interests of ourselves or third parties, especially for consultation and data sharing with credit agencies (e.g. Experian) to determine credit rating and/or default risks in the lending business.

d. Responsibility

If you enter data in the customer portal for the above-referenced processing, you are responsible for the lawfulness of collecting and entering this data in the customer portal, or for any related requirements under data protection laws.

We are then responsible for processing the data in compliance with data protection laws and data security for the data processing set forth in 7 c).

e. Passwords

You must enter the personal password to access an established user account. You and/or your employees are responsible for choosing a secure password and protecting it from access by third parties.

f. Options for filing objections: deletion

You can delete the data on file at any time from the customer portal and cancel the user account in the administrative section at any time.

You can also object to the storage of the personal data entered at the time of registration and use.

We also delete the data on file once they are no longer needed for the relevant purpose and there are no legal retention obligations that conflict with deletion. If the data are not deleted because they are required for other, lawful purposes, their processing will be restricted. This means the data will be blocked and not processed for other purposes. This applies, for instance, to user data that must be retained pursuant to commercial or tax law.

DATA SHARING

The companies who need access to your data so that we meet our contractual and legal requirements will receive access to your data. These companies fall into the categories of credit-lending services, IT services, logistics, printing services, telecommunications, advice and consultation, plus sales and marketing.

We are only permitted to forward information if statutory provisions demand this, we can prove there would be a legitimate interest or we have consent for this or are specifically authorised. Potential recipients of personal data under these conditions include:

- Public bodies and institutions (e.g. the Bank of England, Financial Supervisory Authority, the European Banking Authority, the European Central Bank, tax authorities) if there is a statutory or official obligation to do so.
- Other credit and financial service providers or similar institutions to whom we send personal data in order to maintain the business relationship with you (e.g. correspondent banks, credit agencies).
- Other companies within our Group conducting a risk controlling process because of a statutory or official requirement to do so.
- Other companies within our Group from which information can be provided that are suitable to the company's interests and are confirmed as a legitimate interests.

INTERNATIONAL DATA SHARING

Data will be sent to locations in states outside of the European Union ('third countries') if:

- it is necessary for carrying out your orders (e.g. payment orders),
- it is legally required (e.g. notification is obligatory under tax laws)
- you have given us your consent to do so or
- the company that is receiving the data is GDPR compliant.

DATA SAFEGUARDING

GRENKE will take appropriate technical and organisational security measures to safeguard information (including unauthorised or unlawful processing and accidental loss or damage of data).

We will process and store personal data for as long as is necessary to fulfil our contractual and legal obligations. Please note that our business relationship is a continuing obligation that is set up for years.

If the data is no longer required to fulfil contractual or legal obligations, it will be deleted periodically unless temporary further processing is required for the following purposes:

- Fulfilment of a duty to preserve the data under commercial and tax laws, i.e. the UK Commercial Law, UK Company Law, HM Revenue & Customs, the UK Banking Act (2009), the Money Laundering Act and the UK Securities Trading Act (2001). These laws require data to be kept/documented for between two and ten years.
- Retaining evidence in accordance with the statutory periods of limitation that apply.

GRENKE are responsible for data processing and safeguarding. We have appointed a Data Protection Officer (DPO) which can be contacted via post at GRENKE, FAO The Data Protection Officer, 5th Floor, Saxon House, 3 Onslow Street, Guildford, GU1 4SY

Any breach of security leading to the destruction, loss, alteration, unauthorised disclosure of, or access to personal will be reported within 72 hours of its discovery to the DPO who will ensure a full investigation takes place and notify those involved, where the breach is likely to result in a high risk to the rights and freedoms of the individual involved.

PERSONAL DATA RIGHTS

Each individual we deal with has a right;

- to be informed

- of access
- of rectification
- of erasure
- to set restrictions of processing
- to object
- the right to data portability
- and rights in relation to automated decision making and profiling.

Each individual also has a right to complain to the Information Commissioner's Office
<https://ico.org.uk/concerns>.

You may withdraw your consent to your personal data being processed by us at any time. This also applies to the withdrawal of declarations of consent received before GDPR comes into force. Please note that this withdrawal will apply going forward. It will not apply to any data processed before the withdrawal.

You have the right, at any time, to opt out of any processing of your personal data taking for reasons relating to your own particular situation.

If you unsubscribe, we will not process your personal data anymore, unless we are able to prove that there are legitimate compelling reasons for the processing that prevail over your interests, rights and freedoms, or the purpose of the processing is to assert, exercise or defend legal claims.

In individual cases, we will process your personal data for direct marketing and profiling connected to marketing purposes. You have the right to opt out at any time; after which we will no longer process your personal data for these purposes.

The unsubscribe option will be available to you on every communication or you can contact **dataprotection@grenkefactoring.co.uk** directly.

To make a data request, individuals must contact GRENKE via telephone T +44 1483 401740, email **dataprotection@grenkefactoring.co.uk** or via post GRENKE, FAO The Data Protection Officer, 2 London Square, Cross Lanes, Guildford, GU1 1UN.

Information will be provided as soon as possible (1 month at the latest). This may be extended if the request is complex or numerous, in which GRENKE will notify the individual of this extension.

GRENKE will provide a description of the personal data, the purpose for which it is processed, recipients, retention period and rights of rectification, erasure, restrictions and objections plus the source of the data.

Any rectifications will be carried out without undue delay and investigations will be taken into how the error occurred.