

Customer Marketing Statement

May 2018

1. INTRODUCTION

- 1.1 This Customer Marketing Statement (“**Marketing Statement**”) describes how Lending Works collects, uses, shares and stores personal information about you for the purposes of marketing, advertising, making available promotional offers and information, and performing statistical analysis and/or conducting market research (“**Agreed Purpose**”). This includes both personal information from which you can be instantly identified and personal information from which you can be identified when used in combination with any other information. We collectively refer to this as your “**Personal Information**”.
- 1.2 You should read this Marketing Statement carefully. **We will only ever process your Personal Information for the Agreed Purpose as set out in this Marketing Statement if you give us your express consent to do so.**
- 1.3 You will have the option to give your consent when you apply to open an account with Lending Works on our website (www.lendingworks.co.uk or any pages arising from or connected to the stated domain, referred to as the “**Website**”) or on the Lending Works Platform (“**Platform**”).
- 1.4 It is not mandatory to agree to this Marketing Statement and your consent to this Marketing Statement it is not a precondition of any product or service made available to you through Lending Works.

2. IDENTITY OF THE DATA CONTROLLER

- 2.1. The Data Controller under this Marketing Statement is Lending Works Limited.
- 2.2. Lending Works Limited (“Lending Works”, “us”, “we”) is authorised and regulated by the Financial Conduct Authority under firm reference number 723151 and is registered with the Personal Information Commissioner's Office under registration number ZA002001.
- 2.3. Lending Works 'company registration number is 8302549 and its registered office is at 60 Gray's Inn Road, London, WC1X 8AQ.

3. DATA PROTECTION OFFICER

- 3.1. Lending Works has appointed a Data Protection Officer.
- 3.2. The Data Protection Officer may be contacted using the following contact details:

Email: cs@lendingworks.co.uk
Post: Lending Works Limited, 60 Gray's Inn Road London WC1X 8AQ
Telephone: 020 7096 8512

4. PRIVACY STATEMENT

- 4.1. This Marketing Statement should be read in conjunction with the Lending Works [Privacy Statement](#). In order to avoid duplication, we have cross-referred back to the Privacy Statement where appropriate.

5. INFORMATION WE MAY COLLECT ABOUT YOU

- 5.1. The Personal Information we will collect about you under this Marketing Statement is the same as the Personal Information set out in section 4 of the [Privacy Statement](#).

6. DISCLOSING INFORMATION

- 6.1 We may disclose any Personal Information we obtain under this Marketing Statement, for the Agreed Purpose as set out in this Marketing Statement to:

6.1.1 any of our affiliates and business partners (including credit brokers and intermediaries);

6.1.2 any retailers from whom you purchase or propose to purchase goods and/or services using point of sale finance provided by us;

6.1.3 any external providers of services and benefits associated with your Lending Works Account;

6.1.4 any other party approved by you;

6.1.5 anyone to whom we may transfer our contractual rights;

- 6.2 If you are a prospective borrower and we are unable to approve your loan application, we may offer you the opportunity to be referred to a partner loan broker. **Where this is the case, we will only pass your Personal Information over if you agree to us doing this at that time.**

7. USE OF YOUR INFORMATION

- 7.1 We may use the Personal Information about you obtained under this Marketing Statement for any of the following (which make up the Agreed Purpose):

Advertising and marketing our products and services

- 7.2 This will include:

7.2.1 sending you offers and promotions by email, SMS, direct mail and through telemarketing

7.2.2 providing you with the information, products and services that you request from us; and

7.2.3 permitting our business partners, affiliates and other selected third parties to provide you with information about goods or services we feel may interest you.

- 7.3 Our Website or any communications with you may, from time to time, contain links to and from the websites of our business partners and affiliates. If you follow a link to or from any of these websites, you should note that these websites have their own privacy notices and that we do not accept any responsibility or liability for these notices. Please check these notices before you submit any personal information or data to these websites.

Advertising and marketing of products and services of our third-party business partners and affiliates

- 7.4 This will include:
- 7.4.1 third-party business partners and affiliates sending you offers and promotions by email, SMS, direct mail and through telemarketing
 - 7.4.2 third-party business partners and affiliates contacting you and providing you with the information, products and services that you request from them
 - 7.4.3 third-party business partners and affiliates using Personal Information about you to identify goods and services in which you may be interested;

Improving our products and services and to conduct research and analysis

- 7.5 This will include:
- 7.5.1 developing and improving our products and services;
 - 7.5.2 obtaining your views on our goods, services and Website/Platform;
 - 7.5.3 analysing the effectiveness of our ads, promotions and offers;
 - 7.5.4 conducting testing of our systems, Website, Platform and other operations; and
 - 7.5.5 performing statistical analysis and/or conducting wider market research.

8. WITHDRAWAL OF CONSENT

- 8.1 After you have given us your consent to processing your personal data as set out in this Marketing Statement, you have the right to withdraw your consent at any time.
- 8.2 To withdraw your consent, sign in to your account, visit the "My details" page and change your "Email preferences". You can also click unsubscribe in any marketing email we send you.
- 8.3 If you withdraw your consent, you acknowledge and agree that we will not be able retrieve any Personal Information we have already sent to any third parties based on your initial consent.

9 STORING YOUR INFORMATION

- 9.1 How we store your Personal Information is the same for store all your Personal Information we will collect about you under this Marketing Statement and is set out in section 9 of the [Privacy Statement](#).

10 DATA SECURITY

- 10.1 Our Data security provisions are the same for all your Personal Information as set out in section 10 of the [Privacy Statement](#).

11 RETENTION OF YOUR INFORMATION

- 11.1 This is the same for all your Personal Information as set out in section 11 of the [Privacy Statement](#).

12 ACCESS TO YOUR INFORMATION

- 12.1 Under the European General Data Protection Regulation (“**GDPR**”), you have the right to ask for confirmation that your personal data is being processed and request a copy of the Personal Information that we hold about you (but only in relation to your own “personal data”). This is called a "subject access request". This applies to your Personal Information obtained and processed under this Marketing Statement and is set out in section 12 of the [Privacy Statement](#).
- 12.2 To make a "subject access request" please follow the process set out under section 12 of the [Privacy Statement](#).

13. RIGHT TO RECTIFICATION

- 13.1 You have the right to have inaccurate personal data rectified. You also have a right to have incomplete personal data completed. This applies to your Personal Information obtained and processed under this Marketing Statement and is set out in section 13 of the [Privacy Statement](#).
- 13.2 To make a make a request for rectification please follow the process set out under section 13 of the [Privacy Statement](#).

14 RIGHT TO ERASURE

- 14.1 You have the right to have personal data erased. This is also known as the ‘right to be forgotten’. This is a limited right and only applies in certain circumstances. This may apply to your Personal Information obtained and processed under this Marketing Statement and is set out in section 14 of the [Privacy Statement](#).
- 14.2 To make a make a request for erasure, please follow the process set out under paragraph section 14 of the [Privacy Statement](#).

15 RIGHT TO RESTRICT PROCESSING

- 15.1 You have the right to restrict the processing of your personal data. This is a limited right and only applies in certain circumstances. This may apply to your Personal Information obtained and processed under this Marketing Statement and is set out in section 15 of the [Privacy Statement](#).
- 15.2 To make a make a request to restrict processing, please follow the process set out under section 15 of the [Privacy Statement](#).

16 RIGHT TO OBJECT

- 16.1 You have the right to object to the processing of your personal data. This is a limited right and only applies in certain circumstances. This may apply to your Personal Information obtained and processed under this Marketing Statement and is set out in section 16 of the [Privacy Statement](#).
- 16.2 To raise an objection, please follow the process set out under section 16 of the [Privacy Statement](#).

17 RIGHT TO DATA PORTABILITY

- 17.1 The right to data portability allows you to obtain and reuse your personal data for your own purposes across different services. It allows you to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way, without hindrance to usability. This is a limited right and only applies in certain circumstances. This may apply to your Personal Information obtained and processed under this Marketing Statement and is set out in section 17 of the [Privacy Statement](#).
- 17.2 To make a request for portability of your personal data, please follow the process set out under paragraph section 17 of the [Privacy Statement](#).

18 MAKING A COMPLAINT TO THE ICO

- 18.1 If you want to make a complaint about Lending Works or how we have handled your personal data you can e-mail us at cs@lendingworks.co.uk, with brief details of your complaint and your Lending Works Membership Number.
- 18.2 For full details of our complaints procedure including how we deal with your complaint, please visit www.lendingworks.co.uk/complaints.
- 18.3 If you raise a complaint, in the unlikely event that we are unable to resolve your complaint, you may also be able to refer the complaint to the Information Commissioner's Office (ICO), details of which can be found at www.ico.org.uk. You can also do this without first complaining to us.

19. COOKIES

- 19.1 Our Website uses "cookies" and other technologies, which store small amounts of technical information on your computer or device, to allow certain Personal Information from your web browser to be collected. You can find more details about this in our [Cookie Policy](#).
- 19.2 You may be able to configure your browser not to accept cookies, although this may affect your ability to use the services we provide. If you withdraw your consent under section 8 of this Marketing Statement, you will still have to carry out the configuration change under his paragraph separately as we are not able to make this change to your browser.

20. REMARKETING ADVERTS

- 20.1 Remarketing is a way for us to connect with users, based upon your past interactions with the Website. Third-party marketing vendors may be hired by Lending Works to perform remarketing services. As a result, third-party vendors, including Google, may show our adverts on websites you visit on the internet. Third-party vendors, including Google, use cookies to serve advertisements based on a user's prior visits to our Website.
- 20.2 To opt out of customized Google Display Network ads [click here](#). To find out more about how Google uses any data it collects please visit http://www.google.com/privacy_ads.html. If you withdraw your consent under section 8 of this Marketing Statement, you will still have to carry out the "opt out of customized Google Display Network ads" under his paragraph separately as we are not able to make this change for you.

21 LAWFUL BASIS

- 21.1 We will always collect any personal data about you in compliance with the GDPR.
- 21.2 Under the GDPR, we are required to tell you about the lawful basis for processing your personal data under this Marketing Statement
- 21.3 We will process your personal data under this Marketing Statement in line with your **consent**: you have given us your clear consent to process your personal data for the Agreed Purpose.
- 21.4 You are entitled to withdraw your consent at any time, as set out in section 8 of this Marketing Statement.

22 CHANGES TO THIS MARKETING STATEMENT

- 22.1 We may change any provision of this Privacy Statement at any time without permission. We may inform you in advance of any such changes or notify you immediately thereafter.
- 22.2 We may do this by posting a new version on our Website, by sending you a notification message within your Lending Works Account or by emailing you.
- 22.3 If you are not happy with the changes we have made, you are entitled to withdraw your consent to this Marketing Statement at any time, as set out in section 8 of this Marketing Statement