

## Cox & Co Commercial Privacy Notice

Here at Cox & Co Commercial, we take your privacy seriously; please take the time to read and understand our Privacy Notice.

### Who we are

Watts & Cox Partnership LLP trading as Cox & Co Commercial (“we”) are Commercial Finance Brokers based 12 Castle Terrace, Edinburgh, EH1 2DP. Our nominated representative for the purposes of data protection is John Cox who can be contacted using the postal address given above, by email via [j.cox@coxandco.co](mailto:j.cox@coxandco.co) or by telephone on 0131 229 6017. We will be the Data Controller for the purposes of the UK data protection regime.

We act as a Broker for our customers. Cox & Co Commercial is an Appointed Representative of Watts Commercial Finance Ltd (FRN 718058) which is Authorised and Regulated by the Financial Conduct Authority. Our ICO Registration Reference is ZB985043.

### Information we will collect about you

We may collect the following personal data about you (along with other non-personal data):

1. Verification Details e.g. Name, Date of Birth, National Insurance Number, Driver’s Licence Number;
2. Contact Details e.g. address, telephone number, email address;
3. Service Details e.g. what services you require from us
4. Location Details.
5. Call recordings (where recording is in operation) e.g. recordings of incoming and outgoing telephone conversations, including any personal information discussed during the call.

The information collected about you may come from you or from external sources such as credit reference agencies and fraud prevention agencies.

### How we will use the Information about you and our lawful basis for doing so

We will use your personal data for the following purposes:

1. To respond to your service enquiry;
2. To carry out our obligations arising from any contracts entered into between you and us;
3. To notify you about any changes to our service;
4. To provide you with information about other products or services we offer that may be of interest to you;
5. To provide you with information, products and services you request from us;
6. To approach lenders on your behalf to arrange the funding you require;
7. To make lender decisions;
8. For fraud prevention;
9. For audit purposes;
10. For statistical analysis;
11. For credit reference checks;
12. For Electronic Identity Verification;
13. For quality assurance, staff training, compliance monitoring, complaint handling and dispute resolution where telephone calls may be recorded.

Our lawful bases for handling your personal data in the above ways are: (1) because it is necessary for performance of a contract with you; (2) because it is a legal obligation upon us; (3) because it is necessary for our legitimate interests (including quality assurance, training, compliance monitoring and dispute resolution) or (4) because we have obtained your consent. Where we are relying upon your consent, you have right to withdraw such consent at any time by emailing our data protection representative. Where call recording is in operation, calls may be recorded for the purposes set out above. You will be notified of this at the beginning of

the call. Where recording takes place, recordings are processed in accordance with applicable data protection law. Recording is temporarily paused if you provide card or other sensitive payment information and resumes immediately afterward. Any call recordings would be retained only for as long as necessary to fulfil the purposes for which they were collected, generally up to six years after the end of the customer relationship, in line with regulatory requirements. Some recordings may be retained longer where required by law.

We need your basic personal data in order to provide you with an accurate recommendation for your personal circumstances. The processing of your personal data may be necessary because you have asked us to take specific steps before entering into a contract. You do not have to provide us with personal data we request but if you do not provide us with the required personal data we may not be able to provide the required services to you.

### How we share your information

We may share your personal information with the following:

1. Our employees and officers
2. Lenders\*
3. Specialist funders
4. Solicitors
5. Accountants
6. Credit reference agencies
7. Fraud prevention agencies
8. Credit enforcement agencies
9. Data destruction agencies
10. Service providers who support our operations including IT support companies, client portal providers, document management platforms, marketing agencies and electronic verification providers.
11. Third party companies and organisations if we are under a duty to disclose your personal data in order to comply with a legal obligation.
12. Third party companies and organisations who offer services that may be of assistance to you where we cannot provide the service you require.
13. Lead suppliers (if a third party introduced you to us).
14. Our principal firm, Watts Commercial Finance Ltd, who oversee and process applications for compliance, regulatory and administration purposes. For more information on how they will handle your personal data, please refer to their Privacy Notice <https://watts-commercial.co.uk/contact/privacy-notice/>
15. Payment service providers for the purpose of processing card payments
16. Any of the above may contact you directly.

\*We use a range of lenders and may share your information with them. These lenders will not be governed by our Privacy Notice and as such we therefore strongly recommend that you read the privacy notices of these lenders to understand how they will process your personal data.

If you would like to review our panel of lenders privacy notices, please visit <https://watts-commercial.co.uk/contact/privacy-notice> or you can access directly through the lender(s) website. If you do not have access to a PC and would like paper copies, please contact your Commercial Manager.

For the avoidance of doubt, any processing undertaken by any of the referenced third-parties above is performed separately from us.

For further information on how your information is used, how we maintain the security of your information and your rights to access/alter and change information we hold about you, please contact [j.cox@coxandco.co](mailto:j.cox@coxandco.co)

\*\*We shall use our reasonable endeavours to maintain a current and up to date list of our lenders' privacy notices on our website. However, if a lender (or their privacy notice) is not present on our website or a link to their privacy notice is no longer accessible, it is strongly advised you access this directly through the lender or you contact your Commercial Manager.

## Marketing

From time to time, we would like to contact you by post, email, telephone and text with details of Products, Information, News and Competitions. We will only contact you in this way and for these purposes if you have given your consent (see below “Consent for Marketing” section).

Please note that you can confirm your preference to marketing within the Consent for Marketing section.

## Where we store your personal data

We have a data protection regime in place to oversee the effective and secure processing of your personal data.

Your data is stored electronically on our cloud encrypted server; our server is based in the UK. For the purposes of IT hosting and maintenance, your personal data may be transferred to servers within the European Union.

Paper-based records are kept in locked cabinets in secure office premises. All client files/data are backed up to ensure maximum security of confidential information is maintained.

## How long we keep your personal data

We retain personal data only for as long as necessary to fulfil the purposes for which it was collected. In general, records relating to financial services are retained for up to six years after the end of the customer relationship, in line with regulatory requirements. Some data may be retained longer where required by law.

Other personal data will be retained for no longer than necessary to protect our commercial and operational interests, which include fraud prevention, use in legal proceedings and for taxation purposes.

The information used for marketing will be kept by us until you notify us that you no longer wish to appear on our marketing database.

If you would like more information on our data retention periods, please contact us at [j.cox@coxandco.co](mailto:j.cox@coxandco.co)

## What are your rights?

As a Data Subject, you have the following rights:

1. The right to request a copy of all personal data we hold about you (a fee will be payable for excessive requests);
2. The right to request correction of personal data we hold about you if it incorrect or incomplete;
3. The right to deletion of personal data we hold about you where there is no compelling reason for us to continue to hold it;
4. The right to restrict our data processing activities;
5. The right to request transfer of your personal data to a third party;
6. The right to object to processing if the lawful basis is legitimate interest or performance of a task in the public interest or if the processing is direct marketing;
7. The right to file a complaint with the ICO (<https://ico.org.uk/>).

If you wish to raise a complaint on how we have handled your personal data, you can contact our Data Protection Manager (John Cox) who will investigate the matter.