

E.L.I. LTD.
EAST LOTHIAN INVESTMENTS Ltd.

Developing a modern East Lothian

General Data Protection

Privacy Policy

This policy should be read and carried out by all staff who undertake collection procedures within the business.

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| Board of Directors approval date | May 2018 |
| Next review date - GDPR | May 2019 |
| Review lead | Manager ELI Ltd |

*East Lothian Investments Ltd, Registered in Scotland No:187674, Registered Office,
John Muir House, Haddington, East Lothian EH41 3HA.
Authorised and regulated by the Financial Conduct Authority*

BACKGROUND:

East Lothian Investments Ltd understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our clients and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

1. Information About Us

East Lothian Investments Ltd.

Limited company registered in Scotland under company number SC 187674].

Registered address: John Mur House, Room 2.19, Brewery Park, Haddington, East Lothian.

Main trading address: John Mur House, Room 2.19, Brewery Park, Haddington, East Lothian.

Data Protection Officer: Richard Baty.

Email address: rbaty@eastlothian.gov.uk .

Telephone number: 01620 827177.

Postal Address: John Mur House, Room 2.19, Brewery Park, Haddington, East Lothian.

We are authorised and regulated by the Financial Conduct Authority.

2. What Does This Notice Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

3. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

4. What Are My Rights?

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 11.
- b) The right to access the personal data we hold about you. Part 10 will tell you

how to do this.

- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 11 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 11 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that you can ask us for a copy of your personal data held by us to re-use with another service or business in many cases.
- h) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.
- i) For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 11.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

5. **What Personal Data Do You Collect?**

We may collect some or all of the following personal data (this may vary according to your relationship with us):

- Name;
- Address;
- Email address;
- Telephone number;
- Financial Statement;
- Personal Credit Report;
- CV;
- Marital status;
- Dependents;
- Evidence of address and proof of identity.
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6. **How Do You Use My Personal Data?**

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate

business interests to use it. Your personal data will be used for:

- Providing and managing your account and loan agreement.
- Supplying our loan product to you. Your personal details are required in order for us to enter into a contract with you.

7. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods:

- The personal data will be retained for the period of the loan contract with us plus 1 month;

8. How and Where Do You Store or Transfer My Personal Data?

We will only store your personal data in the UK. This means that it will be fully protected under the GDPR.

9. Do You Share My Personal Data?

We will not share any of your personal data with any third parties for any purposes, subject to one important exception.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

10. How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 11.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within 1 week and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

11. How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details –

For the attention of Richard Baty, Fund Manager:

Email address: rbaty@eastlothian.gov.uk.

Telephone number: 01620 827177

Mobile number: 07854 191597

Postal Address: 2.13 John Muir House, Haddington, East Lothian, EH41 3HA.

12. Changes to this Privacy Notice

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available on the following website
www.eastlothianinvestments.com/.