

## **PRIVACY POLICY**

This privacy notice relates to the Association of Short Term Lenders which is not for profit trade body whose registered office is at York House Empire Way Wembley Middlesex HA9 0FQ and explains about the information we collect about you and the basis on which we control and process it.

### **Website and Cookies**

We use a third party service to help maintain the security and performance of our website. To deliver this service it processes the IP addresses of visitors to our website. We do not attempt to use this information to identify visitors but reserve the right to do so in the event of malicious attack or suspected criminal activity.

### **Collecting data – when you make contact**

**By phone** - We may use call number identification to recognise who is calling us and to have a short term record of calls received. We may record some calls for training and monitoring purposes. We will capture information that you give us for our records and in order to deal with your enquiry and process it in accordance with our processing basis as set out below.

**By email** - If you send us an email that is not encrypted any personal data within it may be at risk. We will capture and process the information in the email for our legitimate interest and legal purposes as set out below. When we send emails we may encrypt some emails or their content in order to protect personal data.

**By on-line enquiry and post** - When we receive an enquiry or application via any enquiry form on our website, by email or a paper application it may contain personal information for applicants for membership, associate membership or of those seeking our help and guidance.

### **Providing information to us on other people**

In providing information to us about other people you warrant that you have their permission to give us their data and that you have provided them with our privacy notice so that they are aware of the basis on which we will process their information. We store information provided to us in both electronic and paper based systems.

### **Other parties we may obtain information from**

We may obtain information about you from other providers such as via google and other websearch tools, social media, or other providers of public information services such as the Financial Services Authority, Companies House etc. We only do this when we are considering whether or not to consider your application for membership or associate membership or for a job or if you we are considering you as a service provider.

### **Basis of processing data and who we share your data with**

We will hold and process your data for the **performance of our contract** with you in order to:

- Manage our relationship with you during your period of membership

- Manage our business relationships with our professional advisers, contractors and third party providers

We will hold and process your data for our **legitimate interest** in order to

- Determine whether or not to offer you membership or associate membership
- To consider any application for a job, including CV's, and whether to progress it
- Share information where necessary with members, associate members, our professional advisers, contractors and third party providers to further the aims of the association
- Share information with any recruitment agency or search provider about your job application

We will hold and process your data for **legal purposes** in order to:

- Meet our legal obligations
- Help identify you and meet our anti-money laundering obligations
- Supply information to any government body, regulatory authority, law enforcement agency as required

We will hold and process your data **by consent** for marketing purposes in order to keep you informed of:

- Our products and services and those of any associate members
- Information contained in any newsletter we may issue
- Products and services of any selected third parties whose products we consider may be suited to your business needs where you have agreed to this

We may use a third party provider to issue this information to you but will not share your information with any other third party for marketing purposes.

We may also gather information on our marketing in order to understand and measure the effectiveness of it and to make improvements as a result.

### **Retaining information**

We will retain information for our legitimate interests, performance of our contract and legal purposes as follows:

- Membership and associate membership details – up to 3 years post cessation of membership to meet any accounting, regulatory and legal requirements and membership analysis
- Enquiries and applications for membership and associate membership – up to 1 year from the date the enquiry or application is marked not proceeded with – may be longer where we have concerns about potential fraud or where an application is deferred and we agree to keep the application open for the period of deferment
- Professional advisers, contractors and third party advisers – up to 3 years from the end of our relationship

**Where you have consented to marketing we will retain your contact information for marketing purposes until such time as consent is withdrawn.**

## **Your rights**

If you are a sole trader or non-limited partnership you have the right as an individual to request details on the information we hold on you and to ask us to correct any information which may be inaccurate. To exercise your right please contact us and ask for a Data Subject Access Request form.

You are also able to exercise your right to be forgotten. This does not mean we will have to automatically delete all information held on you as we may still need to keep appropriate information in order to meet our legal obligations and for our legitimate interests.

There are other rights which, due to the basis on which we process data, you may not always be able to exercise. These include:

- To restrict processing of your data
- To provide your data in a portable format
- To object to the processing of your data

You might also wish to complain about the way in which we have processed your data.

To exercise your rights or to make a complaint please contact us at:

[info@theastl.org](mailto:info@theastl.org) or call 01628 367139 or write to The ASTL at 1 Bell Street, Maidenhead, Berkshire, SL6 1BU

You also have the right to make a complaint to the Information Commissioners Office. You can make a complaint to them via their website [www.ico.org.uk](http://www.ico.org.uk) or by calling them on 0303 123 1113.

## **Changes to this privacy notice**

We may review our privacy notice from time to time.

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