AP Commercial Finance Limited Privacy Notice

Last updated: 20/03/25

AP Commercial Finance Limited · Credit broker, not a lender · ICO ZB877717

This privacy notice explains how AP Commercial Finance Limited may collect, use, share and protect personal data. Last updated: 20/03/25.

Important regulatory information

AP Commercial Finance Limited is an Appointed Representative of The Fiducia Network Ltd, which is authorised and regulated by the Financial Conduct Authority under FRN 917537. We are a credit broker and not a lender. We conduct both regulated and unregulated business and therefore not all products provided through us are regulated by the Financial Conduct Authority. We are registered with the ICO under ZB877717.

AP Commercial Finance Limited is registered in England and Wales, Registered No. 13808561, Registered Office: 38 Middlehill Road, Colehill, Wimborne, Dorset, BH21 2SE. AP Commercial Finance Limited is a member of the National Association of Commercial Finance Brokers (NACFB) and adheres to its Code of Practice.

Who we are

We are AP Commercial Finance Limited, referred to in this notice as "Our Company".

- Telephone: 01277 287 815
- Address: Hill House, 24 High Street, Billericay, Essex, CM12 9BQ
- Email: info@ap-commercial-finance.com
- Data Protection Officer/contact: Mr Alex Phillips
- ICO Registration Number: ZB877717

Our legal grounds for holding your data

The UK's data protection laws allow us to use your personal data provided we have a lawful basis to do so. This includes sharing it in certain circumstances as described below.

We consider we have the following legal bases to use your personal data:

- Performance of contract with you: we need to use your personal data to be able to successfully and legally contract with you.
- Compliance with our legal obligations: we need to use your personal data to comply with certain legislation such as financial crime legislation.
- Legitimate interests: these are our business and commercial reasons for using your data, balanced against your interests. These include helping prevent and detect financial crime, fraud and money laundering, promoting responsible lending and assisting our compliance with legal and regulatory requirements.
- Your consent: you can withdraw consent at any time. We will cease to use your data unless we have a right and a need to continue processing it for one of the other reasons set out in this notice.

What data do we collect?

Data provided by you

- Funder application details: for example, your name, national insurance number, postal address, email address, telephone numbers, date of birth, bank account details, equipment requirement details, home ownership details, reason for borrowing, assets and liabilities, proof of identity documentation, proof of address documentation, evidence of additional equity available and evidence of other business interests.

- When you talk to us: for example, on the phone or in person, including call recordings and voice messages. We may monitor or record calls to check we have carried out your instructions, resolve queries or disputes, improve our service or for regulatory or fraud prevention purposes.
- In writing: for example, letters, emails, texts and other electronic communications.
- Online: for example, when you use our website or mobile app.
- In financial reviews, renewals, surveys and feedback: including customer surveys, message boards or email feedback.

Data we collect when you use our services

- Transaction data: for example, products selected, length of term, asset types, business type and geographical location.
- Payment data: for example, amount, origin, frequency, history and method of payments.
- Usage and profile data: for example, the profile you create to use our website or mobile app and how you use it. We gather this data from the devices you use, cookies and other software.

Data provided to and by third parties

Our Company may also receive your data indirectly from third parties, including:

- Persons that introduce you to us, such as brokers, product suppliers, financial advisers, agents, finance providers or other third parties.
- Credit reference agencies, most likely to be Experian, Creditsafe, Equifax or TransUnion (formerly Callcredit).
- Fraud prevention agencies.
- Publicly available information, including the Land Registry, Companies House, the electoral register, online or media sources, including social media.
- Your representatives where relevant, such as legal and financial advisers, lawyers and accountants.

We may also require a statement signed by an independent qualified accountant as to your financial worth, which may include your gross and net worth, assets and liabilities and available collateral or security. You will be asked to consent to the provision of this information.

Special Category Data

In the course of your interactions with Our Company, you may share information classified as “Special Category Data”. This could include data about race, ethnic origin, politics, religion, trade union membership, genetics, biometrics, health, sex life or sexual orientation.

Where you share information relating to these categories, for example information about your health or a characteristic of vulnerability, Our Company will always seek explicit consent from you to store and process such information.

Why personal data is collected by us

Our Company collects personal data for a number of reasons. From time to time, we may contact you to ask for consent to use your personal data for other purposes. Your personal data may also be used for other purposes where required or permitted by law.

When we and fraud prevention agencies process your personal data, we do so on the basis that we have a legitimate interest in preventing fraud and money laundering and verifying identity, in order to protect our business and comply with applicable laws. Such processing is also a contractual requirement of the services or financing you have requested. Fraud prevention agencies can hold personal data for different periods of time and, if you are considered to pose a fraud or money laundering risk, your data can be held for up to six years.

Credit reference agencies

In order to process your application, we may supply your personal information to credit reference agencies, known as CRAs. They may give us information about you, including your financial history. We do this to assess creditworthiness and product suitability, check identity, manage your account, trace and recover debts and prevent criminal activity.

When CRAs receive a search from us, they may place a search footprint on your credit file that may be seen by other lenders and used to assess applications for finance from you and members of your household. CRAs may also share your personal information with other organisations. We may continue to exchange information about you with CRAs on an ongoing basis, including information about settled accounts and debts not fully repaid on time. Your data may also be linked to the data of your spouse, joint applicants or other financial associates. We can provide the identities of the CRAs and the ways in which they use and share personal information upon request.

How will we use your data?

Our Company collects your data so that we can:

- Process your application and manage your request.
- Email you with information about relevant products and services, where permitted or where you have given consent.
- Monitor the performance of our products and services to ensure consumer outcomes are being achieved.
- Contact you by post, email or telephone to ask for feedback and comments on our services.

Lawful basis for processing data

When personal data is shared

Your personal data may be used by our partners, lenders, brokers, agents, sub-contractors, lawyers and by any of our or their subsidiary or associated companies before, during and after your agreement facilitated by us. We may also use organisations to perform tasks on our behalf, including information technology service providers, banks and transportation companies, and may share your personal data with them. They may also process and retain your data before, during and after your agreement facilitated by us. Any of these third parties may contact you by post, email or telephone where required.

We may also share your personal data with CRAs, fraud prevention agencies, law enforcement agencies, regulators and other authorities, the UK Financial Services Compensation Scheme, any agent you have given us authority to communicate with, persons you ask us to share your data with, companies we introduce you to, market researchers, tracing and debt recovery agencies and customer service agencies for the purposes set out above. These agencies and firms may also share your personal data with others.

Your personal data may also appear on the V5, service history, manufacturers record, insurance documentation or receipts in relation to an asset which may be shared by us with third parties who store, transport, advertise, sell, express interest in purchasing, own or later hire the asset — non-property clients only.

If, in the future, we sell, transfer or merge all or part of our business or assets, including the acquisition of other businesses, we may share your data with other parties. We will only do this if they agree to keep it safe and private and use it only in the same ways as set out in this notice.

Your data protection rights and choices

Your personal data is protected by legal rights, which include:

- Right to be informed: the right to be informed about the collection and use of personal data.
- Right of access: the right to access and receive a copy of your personal data and supplementary information.
- Right to rectification: the right to have inaccurate personal data rectified or completed if incomplete.
- Right to erasure: the right to have personal data erased.
- Right to restrict processing: the right to request the restriction or suppression of personal data.
- Right to portability: the right to obtain and reuse personal data for your own purposes across different services.
- Right to object: the right to object to processing in certain circumstances and the absolute right to stop your data being used for direct marketing.
- Rights in relation to automated decision making and profiling: the right to object to automated individual decision-making and profiling in certain circumstances.

There may be reasons why we need to keep or use your data, but please tell us if you think we should not be processing your data. If you make a request, we have one month to respond. To exercise any of these rights, email info@ap-commercial-finance.com or call 01277 287 815 .

How long is your data kept?

We will retain your personal data as long as you are a customer with us. We may retain your personal data beyond this date for the purposes mentioned above and will in any case retain your personal data for the minimum period required by law. We may also retain your data to deal with disputes, maintain records and show we have dealt with you fairly.

We may also retain your data for research and statistical purposes, in which case we will ensure it is kept private and used only for these purposes.

Data about live and settled accounts is kept on credit files for six years from the date they are settled or closed. If the account is recorded as defaulted, the data is kept for six years from the date of the default.

Changes to our privacy policy

Our Company keeps its privacy policy under regular review and places any updates on this web page. This privacy policy was last updated on 20/03/25.

How to contact us

If you have any questions about Our Company's Privacy Policy, the data we hold on you or you would like to exercise one of your data protection rights, please contact us.

- Email: info@ap-commercial-finance.com
- Call: 01277 287 815
- Write to: Hill House, 24 High Street, Billericay, Essex, CM12 9BQ

How to make a complaint and contact the appropriate authority

If you are unhappy about how your personal data has been used by us, please contact us and we will be happy to register a complaint.

You also have a right to complain to the Information Commissioner's Office, which regulates the processing of personal data. You can contact the ICO at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, on 0303 123 1113 or by email to casework@ico.org.uk .

Marketing

Our Company understands that, with the introduction of Consumer Duty, the level of communications issued by our business may increase. This will be necessary to support customers in understanding the products and services offered and to provide support throughout the lifecycle of the relationship.

Our Company would like to send you information about products and services of ours that we think you may like, as well as those of our partner companies. If you have agreed to receive marketing, you may opt out later.

You have the right at any time to stop Our Company from contacting you for marketing purposes or sharing your data with our group or partner companies where applicable. If you do not indicate your agreement for us to contact you, we may be unable to provide details of products and/or services that may suit your needs and circumstances.

We would like to maintain a record of your express consent for us to contact you by telephone, email and instant messaging for marketing our products or services that we think may be of interest to you.