

Privacy Statement

Who we are

Belinda Milton t/a Reservoir Finance is a commercial finance brokerage based in Rutland. We act as a Broker for our customers and can be contacted using the following details.

Phone: 01572 729 729

Address: The King Centre, Main Road, Barleythorpe, LE15 7WD

Email: privacy@reservoirfinance.co.uk

Data Protection Officer contact: Belinda Milton

ICO registration number: Z7551839

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 reasons (legal bases) to use your personal data:

- Performance of contract with you: we need to use your personal data to be able to successfully legally contract with you.
- Compliance with our legal obligations: we need to use your personal data so as to comply with certain legislation such as financial crime legislation.
- Legitimate interests: these are our business and commercial reasons for using your data, which we have balanced against your interests. We have certain legitimate interests in using your data which are not outweighed by your interests, fundamental rights or freedoms. These legitimate interests are to help prevent and detect financial crime, fraud and money laundering, to promote responsible lending, and to assist our compliance with the legal and regulatory requirements placed upon us.
- Your consent: You can withdraw this consent at any time, in which case we will cease to use it, unless we have a right and a need to continue processing it for one of the other reasons set out above.

What data do we collect?

- Funder application details: for example, but not limited to; your name, postal address, your email address, telephone numbers, date of birth, bank account details, equipment requirement details, home ownership details, reason for borrowing, your assets and liabilities, details of your proof of identity documentation, proof of address documentation, evidence of additional equity available and evidence of any 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 with you to check we have carried out your instructions, to resolve queries or disputes, to improve the quality of 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, for renewals and in any surveys etc.

Data we collect when you use our service

- Transaction data: for example, what sort of products you are selecting, the length of term, the types of assets you are looking at financing, business type and geographical location.
- Payment data: for example, the amount, origin, frequency, history and method of your payments.
- Voluntarily complete a customer survey or provide feedback via email.
- Use or view our website via your browser's cookies.
- Our Company may also receive your data indirectly from a Business Credit Report.

Data provided to and from third parties

- Data from persons that introduce you to us: for example; Brokers, Product Suppliers, Financial Advisers, Agents, Finance Providers or other third parties.
- Data from business credit reference agencies, most likely to be either Red Flag or Credit Safe.
- Data from fraud prevention agencies.
- Publicly available information: for example, from the land registry, companies house, the electoral register, other information available online or in the media, including social media.
- Data from your representatives where relevant: for example, your legal and financial advisers such as lawyers and accountants.

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

Why is personal data collected by us?

Reservoir Finance collects personal data for a number of reasons. From time to time, we may contact you to ask for your 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 to verify identity, in order to protect our business and to comply with laws that apply to us. Such processing is also a contractual requirement of the services or financing you have requested. We, and fraud prevention agencies, may also enable law enforcement agencies to access and use your personal data to detect, investigate and prevent crime. Fraud prevention agencies can hold your 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.

In order to process your application, we or the lender may supply your personal information to credit reference agencies (CRAs) in which case they will give us information about you, such as about your financial history. We do this to assess your creditworthiness and product suitability, check your identity, manage your account, and prevent criminal activity. When CRAs receive a search from us or a lender, 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.

From time to time, we may provide your information to our partners, third parties and customer service agencies for research and analysis purposes so that we can monitor and improve the services (or as the case may be) we provide. We may contact you by post, e-mail or telephone (or as required) to ask you for your feedback and comments on our services (or as the case may be).

We may also contact you about our other goods or services that may be of interest to you.

How we will use your data

Our Company collects your data so that we can:

- Process your application and manage your request.
- Carry out our obligations arising from any agreements entered into between you and us for the provision of our services
- Email you with special offers on other products and services we think you might like.
- To monitor the performance of our products and services to ensure consumer outcomes are being achieved

Lawful basis of processing your data.

Data Type	Lawful Basis for Processing
Performance of Contract	<p>We will process your personal information when that information is necessary to perform our contract with you or for taking steps prior to you entering into a contract with a lender. We will do this for providing you with the product applied for and servicing that product during the life of the relationship. This could include:</p> <ul style="list-style-type: none">• Notifying you about important changes to the features and/or operation of the product.• Responding to your enquiries and complaints.• Updating, consolidating, and improving the accuracy of our records.
Legal Obligations	<p>We will process your personal information when it is necessary to comply with our legal obligations including:</p> <ul style="list-style-type: none">• Checking your identity (this means you as an individual and/or you as a person associated with a corporate entity who is our customer, anti-money laundering checks and checks with Fraud Prevention Agencies.• Crime detection, prevention, and prosecution.• Regulatory reporting.• When required by law and for compliance with laws that apply to us.• To process information about a crime or offence, and proceedings related to these.• When we share your personal information with other people and organisations including:<ul style="list-style-type: none">– your guarantor (if you have one), joint account holders and any person with power of attorney over your affairs.– in cases where we are under a legal compulsion to provide the personal information to Governmental and regulatory bodies.– Courts and to other organisations where that is necessary for the administration of justice.

Legitimate Interests

We will process your personal information when having considered your rights and freedoms, appropriate for us to do so for the following legitimate interests:

- Processing personal information about you as an individual and you as a person associated with a corporate entity (or its subsidiaries) who is our customer – as relevant. For example a signatory, director, trustee, shareholder, controller or where you hold Power of Attorney for a customer.
- Testing new or existing systems.
- To adhere to guidance and best practice under the regimes of governmental and regulatory bodies such as HMRC.
- Administering and managing your account and services relating to IT.
- For some of our marketing (this applies if you are a corporate customer) and in that case we will market to you based on this being for our legitimate interests.
- When we share your personal information with other people and organisations including:
 - your guarantor (if you have one), joint account holders and any person with power of attorney over your affairs.
 - the broker or other intermediary who introduced you to us (if you have one).
 - law enforcement agencies where it is lawful and proportionate to do so.
 - Online review platforms for the purpose of encouraging and understanding customer feedback so we can continuously improve our services.

What we do with it

All the personal data we use is controlled by Reservoir Finance in the UK; however, for the purposes of IT hosting and maintenance, this information is located on servers within the European Union. No 3rd parties have access to your personal data unless the law allows them to do so. We have a Data Protection regime in place to oversee the effective and secure processing of your personal data. Your data is stored electronically and is encrypted with 256-bit AES encryption on transfer and storage.

When personal data is shared

Your personal data may be used by our partners, lenders, brokers, agents, sub-contractors, lawyers and accountants, before, during and after your agreement facilitated by us. Any of these third parties may contact you by post, e-mail or telephone (as required).

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

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 to only use it in the same ways as set out in this notice.

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 at all times retain your personal data for the minimum period required by law. We may also retain your data to deal with any disputes, to maintain records and to 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're settled or closed. If the account is recorded as defaulted, the data is kept for six years from the date of the default.

What are your data protection rights and choices

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

- Right to be informed – Individuals have the right to be informed about the collection and use of their personal data.
- The right of access to your personal data – Individuals have the right to access and receive a copy of their personal data and other supplementary information.
- The right to rectification- Individuals have the right to have inaccurate personal data rectified or completed if incomplete.
- The right to erasure – Individuals have the right to have their personal data erased.
- The right to restrict processing – Individuals have the right to request the restriction or suppression of their personal data.
- The right to portability – This allows individuals to obtain and reuse their personal data for their own purposes across different services.
- The right to object – this gives individuals the right to object to the processing of their personal data in certain circumstances, it also gives individuals the absolute right to stop their data being used for direct marketing
- The right in relation to automated decision making and profiling – this allows individuals to object to their data being used in an automated individual decision-making process (making a decision solely by automated means without any human involvement) and profiling (automated processing of personal data to evaluate certain things about an individual). Profiling can be part of an automated decision-making process.

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 you. If you would like to exercise any of these rights, please contact us at our email, privacy@reservoirfinance.co.uk.

For further information on how your information is used, how we maintain the security of your information and your rights in relation to it, please contact us via email, privacy@reservoirfinance.co.uk or call us on 01572 729 729.

Beneficial Owners

If you make an application for your business, we will also collect the personal data mentioned above about all individuals with whom you have a financial link, for example, other directors or officers of your company, who you must include on the application form.

You must show this policy to any other applicants (including all beneficial owners and directors) and ensure they know you will share their personal data with us for the purposes described in it.

Marketing

Reservoir Finance understands that with the introduction of the Consumer Duty, it is likely the level of communications issued by our business will increase. This will be necessary to support customers to understand the products and services offered and to provide support to customer throughout the lifecycle of the relationship.

Our Company would like to send you information about products and services of ours that we think you might like. If you have agreed to receive marketing, you may always opt out at a later date. You have the right at any time to stop Reservoir Finance from contacting you for marketing purposes.

Cookies

Reservoir Finance does not currently use cookies to track and test customer engagement and actions throughout the customer journey or customer communications.

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 03/02/2025.

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 protections rights, please do not hesitate to contact us.

Email us at: privacy@reservoirfinance.co.uk or Call us: 01572 729 729

Write to us at: The King Centre, Main Road, Barleythorpe, Rutland, LE15 7WD

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 them 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. See also <https://ico.org.uk/make-a-complaint/>.