

Novellus Limited Data Protection Policy

Statement

Novellus Limited is committed to a policy of protecting the rights and privacy of its clients in accordance with The General Data Protection Regulations. The policy applies to all individuals whom share their personal data with Novellus Limited.

Novellus Limited details are registered with the Information Commissioner. Registration reference ZA259171

Legal Requirement

Data is protected by the Data Protection Act. Its purpose is to protect the rights and privacy of individuals and to ensure that personal data is not processed without their knowledge and wherever possible is processed without their consent.

The Act requires us to register the fact that we hold personal data and to acknowledge the right of 'subject access' – individuals/clients must have the right to copies of their own data.

Purpose of data held by Novellus Limited

Data may be held by us for the following purposes (but not limited to):

- 1 - decision making on loans
- 2 - contact details
- 3 - validation/KYC
- 4 - loan transactions
- 5- data may be forwarded to 3rd parties (e.g. solicitors & intermediaries) to help with the set-up and processing of a loan.

Data Protection Principles

In terms of the Data Protection Act, Novellus Limited is the 'data controller', and as such determine the purpose for which any personal data is processed. We must ensure that we have:

1. Fairly and lawfully processed personal data

We will state on our contracts our intentions on processing the data and state if, and to whom, we intend to give personal data.

2. Processed for limited purpose

We will not use data for a purpose other than that agreed by the client. If for any reason data held by us is requested by external organisations, this will only be passed if data subjects agree. External organisations must state their purpose for requesting data.

3. Adequate, relevant and not excessive

Novellus Limited will monitor the data held for our purposes, ensuring we hold neither too much nor too little data in respect of the individuals about whom the data is held. If data given or obtained is excessive for purpose, we will delete/destroy immediately.

4. Accurate and up-to-date

All data acquired by Novellus Limited will be obtained from the start of the loan. Should there be any change in data over the course of the contract in place between Novellus Limited and the client (advised by the client). Novellus Limited will update their records accordingly.

5. Not kept longer than necessary

We discourage the retention of data for longer than required. All personal data will be deleted or destroyed by us after 5 years (post end of client/Novellus relationship) for money laundering and financial crime purposes.

6. Processed in accordance with the individual's rights

All individuals that Novellus Limited hold data on have the right to.

- Be informed upon the request of all the information held about them within 40 days.
- Compensation if they can show that they have been caused damage by any contravention of the Act.
- The removal and correction of any inaccurate data about them.

7. Not transferred to countries outside the European Economic Area (EEA), unless the country has adequate protection for the individual.

Data must not be transferred to countries outside the EEA/countries without adequate protection unless there is consent from the individual.

Individuals' Rights

- The right to be informed about the data held on them;
- The right to access
- Right to rectification
- The right to be have records/information deleted
- The right to restrict processing
- The right to object
- The right to not be subject to automated decision-making.

If an individual requests Novellus to provide details held on them, Novellus will respond within 1 month of such request. All subject access requests shall be sent to info@novelluslimited.co.uk in the first instance. A request can be refused if it is unfounded or excessive. If a request is refused the reason will be explained to the individual. If the individual is not satisfied with the decision they may make a complaint towards a supervisory authority.

Data Protection contact

If a client or third party make a request for personal data, authorisation must be obtained from the individual in writing, should a third-party request personal data Novellus may have on them.

Novellus Limited Privacy Notice

Any data you provide Novellus Bridging (Novellus Bridging is a Trading Style of Novellus Limited) will be used in the decision making and processing of any future loan. The data we collect will be shared with our legal representatives and potentially other third parties to assess your suitability and for future transactions on any loan(s) with Novellus Bridging. We will hold information securely for up to 5 years after your contract with Novellus Bridging ends. Should you wish for us to delete all traces of data we hold about you after your contract expires or should you wish to request details of data we hold about you please email info@novellusbridging.co.uk