

## Capitalise privacy and cookies policy

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### Introduction

This is the privacy and cookies policy (**privacy policy**) for <http://www.capitalise.com> (**website**). The website is operated by Capitalise.com Platform Ltd (**we, us, our or Capitalise**). For the purposes of the General Data Protection Regulations 2018 and the DPA 2018 (as applicable), we are the data controller in respect of your data that we become in possession of through your use of the website.

We are committed to protecting your privacy online. We appreciate that you do not want the personal information you provide to us distributed indiscriminately and this privacy policy explains how we collect information, what we do with it and what controls you have.

By using the website as a prospective or registered borrower, lender or introducer, you consent to the collection and use of information in accordance with this privacy policy.

We reserve the right to change this privacy policy from time to time by changing it on the website. This privacy policy was last updated on 9th July 2019.

### Information we may collect from you

We may collect and process the following information about you and your business:

- information (such as your name, email address, postal address, telephone number and financial information about your business) that you provide or make available to us;
- by completing forms on the website, including if you register with the website as a lender, borrower or introducer or if you subscribe to any of our services;
- by uploading or submitting any material via the website;
- using a third party service or third party application (such as Xero or Quickbooks) to import data to the website or otherwise share your information with us;
- in connection with an account sign-in facility, your log-in and password details;
- details of any transactions made by you via the website or as a result of the service provided via the website;
- communications you send to us, for example to report a problem or to submit queries, concerns or comments regarding the website or our services.

You are under no obligation to provide any such information. However, if you should choose to withhold requested information, we may not be able to provide you with certain services.

If you are an introducer, you may be asked to provide details of a borrower or potential borrower, which may include personal information. By providing us with their details, you confirm that you have their permission and all necessary consents to do so and must not provide us with the details of anyone from whom you do not have such permission.

When you visit the website, we may automatically collect additional information about you, such as the type of internet browser you use, any third party website from which you have come to the website and your IP address (the unique address which identifies your computer on the internet) and your operating system, which are automatically recognised by our web server. We do not intend to identify you from this information and it is only used to assist us in providing an effective service on the website and to collect broad demographic information for aggregate use.

**Cookies**

When you visit our website, our web server sends a cookie to your computer. Cookies are small pieces of information which are issued to your computer when you visit a website, and which store and sometimes track information about your use of the website. A number of cookies we use last only for the duration of your web session and expire when you close your browser ('session cookies'). Other cookies are used to remember you when you return to the website and will last for longer ('persistent cookies').

We use cookies to:

- remember that you have visited us before so that we can identify the number of unique visitors we receive and allow us to make sure we have enough capacity for the number of users that we get;
- customise elements of the promotional layout and/or content of the pages of the website; and
- collect anonymous statistical information about how you use the website (including how long you spend on the website) and where you have come to the website from, so that we can improve the website and learn which parts of the website are most popular with users.

Most web browsers automatically accept cookies but, if you prefer, you can change your browser to prevent that or to notify you each time a cookie is set. You can also learn more about cookies by visiting [www.allaboutcookies.org](http://www.allaboutcookies.org) which includes additional useful information on cookies and how to block cookies using different types of browser. Please note, however, that by blocking or deleting cookies used on the website, you may not be able to take full advantage of the website.

*Our cookies*

<b>Cookie name</b>	<b>Purpose</b>	<b>Type &amp; duration</b>
Capitalise Website Session	Authentication/Login	Session only
Google Tag Manager	Analytics on system usage	Session only

Google Analytics	Analytics on system usage	Session and up to 2 years
Intercom Messenger	Instant messaging	Session and up to 1 year
Inspectlet tracking	Support for customers	Session and up to 1 year
WistiaVideo Hosting	Analytics on video usage	Session only

ADD OTHERS

### Uses made of your information

We will use the information you provide:

- to enable us to provide your business with the services offered through the website and which you request on behalf of your business (either as a lender, borrower or introducer);
- to enable us to maintain records of who uses our website and for what purpose;
- if you are using the website on behalf of a borrower (either as a borrower or an introducer), to enable us to provide to one or more lenders which are registered with us the necessary information to enable them to assess the borrower's suitability for a financial product offered by the lender(s) as set out in the [Capitalise Terms of Use](#);
- to enable us to facilitate the requested relationships between introducers, borrowers and/or lenders via the website;
- to administer your account with us on behalf of your business as a borrower / lender / introducer;
- to improve the layout and/or content of the pages of the website and customise them for users;
- to identify visitors to the website;
- to carry out research on our users' demographics so that we can enhance our offering;
- to send you whitepapers or other information we think you may find useful or which you have requested from us, including information about our services, provided you have indicated that you do not object to being contacted for these purposes; and
- as further set out in the section entitled "Information Sharing".

You can tell us not to contact you with information regarding our services, either at the point such information is collected on the website (by checking or un-checking (as directed) the relevant box) or, where you do not wish us to continue to use your information in this way, by following the unsubscribe instructions on any communications sent to you. You can also exercise the right at any time by contacting us using the details at the end of this privacy policy.

### Information sharing

We will share details relating to borrowers and introducers (whether provided by the borrower directly or via an introducer) to lenders who have registered with us to enable the lenders to

assess the borrower's suitability for a financial product offered by them, and all borrowers and introducers who sign up to the website consent to such.

We may disclose aggregate statistics about visitors to the website in order to describe our services to reputable third parties and for other lawful purposes, but these statistics will include no personally identifiable information.

We may disclose the information you submit via the website to our affiliates, or to our agents or contractors solely to allow them to assist us in providing the services we offer through the website, fulfilling requests for information, receiving and sending communications, updating marketing lists, analysing data, providing support services or in other tasks, from time to time. Our agents and contractors will only use your information to the extent necessary to perform their functions.

In the event that we undergo re-organisation or are sold to a third party, you agree that any personal information we hold about you may be transferred to that re-organised entity or third party.

We may disclose your personal information if required to do so by law or if we believe that such action is necessary to prevent fraud or cyber-crime or to protect the website or the rights, property or personal safety of any person.

### **Third party services**

The website may, from time to time, contain links to external websites. We are not responsible for the privacy policies or the content of such websites.

This privacy policy does not apply to any third-party services (such as Xero) that you choose to access through our website (**Third Party Platforms**) or to any applications developed by third parties that we do not own or control (**Third Party Apps**). For example, this privacy policy does not cover any information you can view on, or submit to, Third Party Platforms via our website. We are not responsible for the content or privacy policies of any Third Party Platforms or Third Party Apps and recommend that you review the privacy policies of any Third Party Platforms and/or Third Party Apps that you access via the Services.

### **Security**

We place great importance on the security of all personally identifiable information associated with our users. We have security measures in place to attempt to protect against the loss, misuse and alteration of personal information under our control. For example, our security and privacy policies are periodically reviewed and enhanced as necessary and only authorised personnel have access to personal information. While we cannot ensure or guarantee that loss, misuse or alteration of information will never occur, we use all reasonable efforts to prevent it.

You should bear in mind that submission of information over the internet is never entirely secure. We cannot guarantee the security of information you submit via the website while it is in transit over the internet and any such submission is at your own risk.

It is advisable to close your browser when you have finished your user session to help ensure others do not access your personal information if you use a shared computer or a computer in a public place.

## **Storage of your information**

Information that you submit via the website is sent to and stored on secure servers located in Europe. This is necessary in order to process the information. Information submitted by you may be transferred by us to our other offices and/or to our third party service providers outside the European Economic Area (EEA). The countries concerned may not have similar data protection laws to the EEA. Where we transfer your information we will take all reasonable steps to ensure that your privacy rights continue to be protected. By submitting information via the website, you agree to this storing, processing and/or transfer.

## **Your rights**

You have a legal right under the General Data Protection Regulations and the DPA 2018 (as applicable) to a copy of all the personal information about you held by us. On request, we will provide you with a copy of this information. You also have a right to correct any errors in that information. As mentioned above, you have a right to prevent the use of your personal information for direct marketing purposes. Further, please contact us should you wish to discuss your rights not to be subject to a decision, or if you wish to discuss our erasing your personal data (which will always be subject to any legal or regulatory requirements we may be subject to).

## **Contacting us**

If you have any questions, concerns or comments about this privacy policy or any requests concerning your personal data, please contact us:

- by emailing us at [support@capitalise.com](mailto:support@capitalise.com); or
- by writing to us at 3rd Floor, 2 Valentine Place, London, SE1 8QH, United Kingdom.