**Forward Business Enterprises Ltd trading as Forward Finance**

**Business Background**

Forward Business Enterprises Ltd trading as Forward Finance is a Home Credit Business regulated by the Financial Conduct Authority (FCA). Loan products include cash loans over terms of 15 and 21 weeks, and vouchers over 14 weeks.

New customers are secured mostly via referral from existing customers, supplemented by occasional leaflet campaigns and advertisements in local shops. There is an online presence by way of our website and various social media websites.

Customer’s personal data is processed solely for the purpose of assessing their suitability for credit and for managing their account. The lawful basis for processing is Contract, (for assessing suitability and managing loans) and Legal (for FCA compliance and accountancy). Personal data is passed in pseudonymised form to the FCA (as required by regulation) and as a password-protected digital file to the company accountant. It is not passed to any third party for marketing purposes.

The business is owner operated. Current strategy does not include the hire of permanent collection agents or any other permanent staff.

Operational accounts are managed locally using proprietary accounting software. The software developer creates any new bespoke functionality and provides online support, installation and support is via remote access. A Non-Disclosure Agreement (NDA) is in effect.

An accountant prepares books for submission to HM Revenue and Customs (HMRC) for company taxation. A password-protected digital copy of the operational accounts issued to the accountant solely for HMRC purposes.

The business is operated from retail premises; the general public has no access to the office area, that being separated by floor to ceiling counters and glass, access to the office area is through a two door mantrap. The premises are locked and alarmed when unoccupied. Paper documents are held in locked cabinets.

Access to IT equipment is password controlled. The office PC’s are encrypted. Digital data is backed up by a UK-based 3rd party.

Data is retained only for as long as legally necessary. Paper documents are ribbon shredded when they are no longer needed. Unnecessary digital data is deleted from hard drives and back-ups.

Forward Business Enterprises Ltd trading as Forward Finance has been registered with the Information Commissioners Office (ICO) since January 2007, registration number ZA058158; registration is renewed annually and remains in effect.

Forward Business Enterprises Ltd trading as Forward Finance has been a member of the Consumer Credit Association (CCA) since January 2007, membership number 10140; membership is renewed annually and remains in effect.

Forward Business Enterprises Ltd trading as Forward Finance is authorized and regulated by the Financial Conduct Authority (FCA).

**Forward Business Enterprises Ltd trading as Forward Finance**

**GDPR Privacy Statement for Home Credit Customer**

Forward Business Enterprises Ltd trading as Forward Finance takes your privacy seriously. Processing of your data is necessary for entering into, and the performance of, a contract with \Forward Finance. Forward Finance ask only for relevant information and use it to set up and service your account. It won’t be used in marketing or sold to third parties. All data is stored within the UK and is protected by British and EU privacy laws.

Information given by you, or about you, in connection with your account will be held only for as long as necessary to service your account and in accordance with legal requirements. You have a right to see what Forward Finance holds about you. On request, in certain circumstances, you can place restriction on the processing of your data. If it is incorrect you can ask for it to be corrected and request for information held by Forward Finance to be deleted: Forward Finance will delete any information that we do not need to hold. You have the right to obtain and reuse your data for your own purposes across different services; this is known as data portability.

To process your application Forward Finance will:

Search their records for information about you;

Collate information on the performance of your account/s, including defaults, changes of name(s), change(s) of address you fail to tell us about where a payment is overdue.

Forward Finance will make its credit decisions based on the information provided by you on this application form, and other members of your household to whom you are financially linked, including records held in previous or subsequent names. For this application you may be treated as financially linked and your application will be assessed with reference to any ‘associated ‘ records’ of others to whom you are financially linked, unless those links have been severed.

If you’re unhappy with the way your data is held and used by Forward Finance you can complain directly to the Information Commissioner’s Office. Under certain circumstances you also have a right to apply for judicial remedy if you are dissatisfied with the decision of the Information Commissioner’s Office. For other complaints not resolved to your satisfaction by Forward Finance you may contact The Financial Ombudsman.

**Forward Business Enterprises Ltd trading as Forward Finance**

**Customer Privacy Notice**

This explains how and why we acquire and use your personal information in accordance with Regulation (EU) 2016/679, the General Data Protection Regulation (GDPR)

**We collect information about you:**

* As part of your loan application and during the term of any agreement
* This includes your name, address, date of birth, contact details, marital status, employment information and records of your account.

**We use your information to:**

* Make credit decisions about you, members of your household or others to whom you are linked financially.
* Communicate with you by telephone, email, SMS, or post.
* Manage your account, make collections and debt tracing.
* Report to our regulator, The Financial Conduct Authority, where we are required to do so.

This is to comply with our legal and regulatory obligations and fulfill our legitimate interests of promoting responsible lending. If you do not provide us with your information, we will not be able to lend to you.

**We may share your information with:**

* Third parties to which we transfer, charge or assign your agreement or which manage your loan or provide services for us.
* Law enforcement agencies or regulatory bodies where we are required to do so by law.

**We store your information:**

* Within the European Economic Area (EEA)

**We keep your information:**

* For as long as it is needed to manage your account and for a maximum of six years unless a longer period is required by law.

**You have the right to:**

* Access the information we hold about you.
* Ask us to make any changes to your information to make sure it is accurate and up to date.
* Ask us to stop or limit our use of or to delete your information.
* Receive your information in a format that suits you.
* Transfer your information to a third party.

**Contact**

If you have a question, want to exercise your rights or make a complaint, please contact our office at D2 The Courtyard, Alban Park Hatfield Road St Albans Al4 0LA, Telephone 01442 266614, email contactus@forwardfinance.net.

You can also make a complaint to the Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF, telephone 0303 123 1113

**Agreement**

I agree to the terms of this Privacy Notice and acknowledge that as part of my loan application the lender may undertake searches of my records.

**I consent to the use of my personal data**

Signed……………………………………………………

Print Name……………………………………………….

Date……………………………………………………...

**Forward Business Enterprises trading as Forward Finance**

**GDPR Privacy Statement for Agent**

Forward Business Enterprises Ltd trading as Forward Finance takes your privacy seriously. Processing of your data is necessary for entering into, and the performance of, a contract with Forward Finance. We will ask only for relevant information as it is in our legitimate interest to assess your suitability for a position with Forward Finance. It won’t be used in marketing or sold to third parties. All data is stored within the UK and is protected by British and EU privacy laws.

Forward Finances policy is to conduct a background check on all potential agents. This includes taking up references , and may include requesting consent for a Basic Disclosure Certificate about unspent convictions according to the Rehabilitation of Offenders Act 1974 (“Basic Disclosure”).

Information given by you, or about you, in connection with your application will be held only for as long as necessary and in accordance with legal requirements. You have a right to see what Forward Finance holds about you. On request in certain circumstances, you can place a restriction on the processing of your data or object to us processing it and to us transferring it. If it is incorrect you can ask for it to be corrected and request for information held by Forward Finance to be deleted. Forward Finance will delete any information it does not need to hold.

To process your application Forward Finance will:

* Search their records for information about you;
* Collating information on the performance of you in your role

The information that we gather can also be used for the prevention of fraud and the prevention of money laundering. If fraud is identified, details will be passed to fraud prevention agencies.

If you are unhappy with the way your data is held and used by Forward Finance you can complain directly to the Information Commissioners Office. Under certain circumstances you also have the right to apply for judicial remedy if you are dissatisfied with the decision of the Information Commissioner’s Office. For other complaints not resolved to your satisfaction by Forward Finance you may contact the Financial Ombudsman.

Please read the following declaration and sign and date accordingly:

I understand the statements set out above and that the checks and searches described above may be carried out. I also understand that the information I have provided and/or which is revealed by the checks and searches may be used and/or disclosed to the persons or organizations described above.

I declare that all the information I have given is true and I have disclosed all relevant information that could effect my application. I understand that if I have made untrue statements or have been willfully misleading in my answers given then this may subsequently lead to termination of an Agent Agreement.

I have submitted the information only for the purpose of assessing me for suitability as a self employed agent with satisfactory references and satisfactory results from my other background checks that may be required.

Signed…………………………………………………… Date…………………………………………………...

I confirm I have read and agree to all of the above and that this signature is my acceptance of the terms and that I want to proceed with my application.

**Forward Business Enterprises Ltd trading as Forward Finance**

**Job Description Data Controller**

1. Key Responsibilities:
2. Determine purpose and means of collection and processing of personal data
3. Create a mechanism to maintain and evidence records of processing activities and security measures
4. Demonstrate that consents have been given to the processing operations
5. Ensure the Processor maintains a record of processing activities, for disclosure to the relevant supervisory authority (in the UK it’s the ICO)
6. To implement appropriate and effective measures for processing and demonstrate compliance with the GDPR
7. Comply with subjects rights requests within GDPR timescales
8. Ensure that data protection is specifically designed and implemented into new or changed processes, including a Data Protection Impact Assessment (DPIA) if necessary
9. Ensure that data processing agreements fully comply with the GDPR, such that an appointed Processor is contractually obliged to meet the requirements of the GDPR delegated to them
10. Ensure contracts include confidentiality obligations on all Processors (business name) agents and third parties)
11. Where the Controllers role is executed jointly w2ith a third party, agree how any liability should be apportioned.
12. Ensure Processors act only in accordance with the Controllers written instructions.
13. Ensure that personal data processed are kept confidential
14. Ensure (business names0 policies, procedures and manuals remain compliant with the GDPR, in particular, but not limited to: Cross-Border Data Transfers, Data Retentions; Security; and Subject Rights.
15. Maintain job descriptions for Data Controllers and Data Processors.
16. Apply the Breach Reporting System where any breach, or suspected breach has occurred.
17. Liabilities

Damage caused by:

1. Neglect to adhere to responsibilities of the Controller; 0r
2. Actions outside of those lawfully allowed; or
3. Failing to implement appropriate technical and business measures to meet GDPR; or
4. Failing to adhere to breach reporting protocols; or
5. Failing to respond to customers rights requests.
6. Other Obligations
7. Identify opportunities to: better manage risk; and
8. Improve operating efficiency
9. Signed:

Name,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,

Signature………………………………………………………….

Date………………………………………………………………