

Swift Privacy Statement

How your personal information is used by Swift Group companies

Your information will be held by the Swift Group, which consists of Swift 1st Limited and Swift Advances plc.

How we use your personal information

We may collect your personal information if you are a customer of the Swift Group, if you apply to become an authorised payer on behalf of a customer, if you supply your personal details to us as part of a customer's application or if you access or use our website.

This privacy notice is to let you know how companies within the Swift Group promise to look after your personal information. This includes what you tell us about yourself and what we learn by having you as a customer. This notice explains how we do this and tells you about your privacy rights and how the law protects you.

Our Privacy Promise

We promise:

- To keep your data safe and private.
- Not to sell your data.

How the law protects you

As well as our Privacy Promise, your privacy is protected by law. This section explains how that works.

Data Protection law says that we are allowed to use personal information only if we have a proper reason to do so. This includes sharing it outside the Swift Group. The law says we must have one or more of these reasons:

- To fulfil a contract we have with you, or
- When it is our legal duty, or
- When it is in our legitimate interest, or
- When you consent to it.

A legitimate interest is when we have a business or commercial reason to use your information. But even then, it must not unfairly go against what is right and best for you. If we rely on our legitimate interest, we will tell you what that is.

Swift 1st Limited is authorised and regulated by the Financial Conduct Authority.

Swift 1st Limited administers its own regulated mortgage contracts and those of Swift Advances plc on its behalf.

Swift 1st Limited and Swift Advances plc are both registered in England and Wales under company numbers 5020019 and 1800474 respectively.

Registered Offices: Arcadia House, Warley Hill Business Park, The Drive, Great Warley, Brentwood, Essex CM13 3BE

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Here is a list of all the ways that we may use your personal information, and which of the reasons we rely on to do so. This is also where we tell you what our legitimate interests are.

What we use your personal information for	Our reasons	Our legitimate interests
<ul style="list-style-type: none"> To manage our relationship with you. 	<ul style="list-style-type: none"> Fulfilling contracts. Our legitimate interests. Our legal duty 	<ul style="list-style-type: none"> Keeping our records up to date. Developing loan products. Defining types of customers for new products or services. Being efficient about how we fulfil our legal duties.
<ul style="list-style-type: none"> To deliver our loan products. To manage fees, charges and interest due on customer accounts. To collect and recover money that is owed to us. 	<ul style="list-style-type: none"> Fulfilling contracts. Our legitimate interests. Our legal duty. 	<ul style="list-style-type: none"> Being efficient about how we fulfil our legal duties. Complying with regulations that apply to us.
<ul style="list-style-type: none"> To detect, investigate, report, and seek to prevent financial crime. To manage risk for us and our customers. To obey laws and regulations that apply to us. To respond to complaints and seek to resolve them. 	<ul style="list-style-type: none"> Fulfilling contracts. Our legitimate interests. Our legal duty. 	<ul style="list-style-type: none"> Developing and improving how we deal with financial crime, as well as doing our legal duties in this respect. Complying with regulations that apply to us. Being efficient about how we fulfil our legal and contractual duties.
<ul style="list-style-type: none"> To run our business in an efficient and proper way. This includes managing our financial position, business capability, planning, communications, corporate governance, and audit. 	<ul style="list-style-type: none"> Our legitimate interests. Our legal duty. 	<ul style="list-style-type: none"> Complying with regulations that apply to us. Being efficient about how we fulfil our legal and contractual duties.
<ul style="list-style-type: none"> To exercise our rights set out in agreements or contracts. 	<ul style="list-style-type: none"> Fulfilling contracts. 	

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Groups of Personal Information

We use many different kinds of personal information, and group them together like this.

Type of personal information	Description
Financial	Your financial position, status and history.
Contact	Where you live and how to contact you.
Socio-Demographic	This includes details about your work or profession, nationality, education and where you fit into general social or income groupings.
Transactional	Details about payments to and from your accounts with us, and insurance claims you make.
Contractual	Details about your loan(s) with us.
Locational	Data we get about where you are, such as may come from your mobile phone, the address where you connect a computer to the internet.
Communications	What we learn about you from letters, emails, and conversations between us.
Social Relationships	Your family, friends, and other relationships.
Open Data and Public Records	Details about you that are in public records such as the Electoral Register, and information about you that is openly available on the internet.
Usage Data	Other data about how you administer your loan account.
Documentary Data	Details about you that are stored in documents in different formats, or copies of them. This could include things like your passport, drivers licence, or birth certificate.
Special types of data	The law and other regulations treat some types of personal information as special. We will only collect and use these types of data if the law allows us to do so: <ul style="list-style-type: none">• Racial or ethnic origin• Religious or philosophical beliefs• Trade union membership• Genetic and bio-metric data• Health data including gender• Criminal convictions and offences
National Identifier	A number or code given to you by a government to identify who you are, such as a National Insurance number.

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Where we collect personal information from

We may collect personal information about you from other companies within the Swift Group and from these sources:

Data you give to us:

- When you apply for a loan
- When information you have provided as part of a customer's loan is supplied to us
- When you talk to us on the phone
- When you use our website
- In emails and letters

Data we collect when you manage your loan account. This includes the amount, frequency, type, location, origin and recipients:

- Payment and transaction data.
- Usage data when making online payments

Data from third parties we work with:

- Companies that introduce you to us
- Financial advisers
- Solicitors
- Credit reference agencies
- Fraud prevention agencies
- Field agents
- Public information sources such as Companies House
- Agents working on our behalf
- Government, regulators and law enforcement agencies.

Who we share your personal information with

We may share your personal information with companies with these organisations:

- Agents and advisers who we use to help run your account and collect what you owe
- HM Revenue & Customs, regulators and other authorities
- UK Financial Services Compensation Scheme
- Credit reference agencies
- Fraud prevention agencies
- Any party linked with you or your loan
- Organisations that introduce you to us
- Other lenders who also hold a charge on the property.
- Companies and charities you ask us to share your data with.
- If you use direct debits, we will share your data with the Direct Debit scheme.

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Credit Reference Agencies (CRAs)

We carry out credit and identity checks when you apply for a loan. We may use CRAs to help us with this.

If you have a loan with us, from time to time we may also search information that the CRAs have, to help us manage that loan.

We will share your personal information with CRAs and they will give us information about you. The data we exchange can include:

- Name, address and date of birth
- Credit application
- Details of any shared credit
- Financial situation and history
- Public information, from sources such as the electoral register and Companies House.

We'll use this data to:

- Help detect and prevent financial crime
- Manage accounts with us
- Trace and recover debts

We will go on sharing your personal information with CRAs for as long as you are a customer. This will include details about your settled accounts and any debts not fully repaid on time. It will also include details of your repayments and whether you repay in full and on time. The CRAs may give this information to other organisations that want to check credit status. We will also tell the CRAs when you settle your accounts with us.

When we ask CRAs about you, they will note it on your credit file. This is called a credit search. Other lenders may see this and we may see credit searches from other lenders.

If you apply for a loan with someone else, we will link your records with theirs.

You should tell them about this before you apply for a loan. It is important that they know your records will be linked together, and that credit searches may be made on them.

CRAs will also link your records together. These links will stay on your files unless one of you asks the CRAs to break the link. You will normally need to give proof that you no longer have a financial link with each other.

You can find out more about the CRAs on their websites, in the Credit Reference Agency Information Notice. This includes details about:

- Who they are
- Their role as fraud prevention agencies
- The data they hold and how they use it
- How they share personal information
- How long they can keep data
- Your data protection rights.

Here are links to the information notice for each of the three main Credit Reference Agencies:

Callcredit: <https://www.callcredit.co.uk/crain>

Equifax: <https://www.equifax.co.uk/crain>

Experian: <https://www.experian.co.uk/crain/index.html>

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Fraud Prevention

If you are a customer of ours, we will share your personal information as needed to help detect fraud and money-laundering risks.

We will use the information to:

- Confirm identities
- Help prevent fraud and money-laundering
- Fulfil any contract you have with us

We may allow law enforcement agencies to access your personal information. This is to support their duty to detect, investigate, prevent and prosecute crime.

The information we use

These are some of the kinds of personal information that we use:

- Name
- Date of birth
- Residential address
- History of where you have lived
- Contact details, such as email addresses and phone numbers
- Financial data
- Data relating to your loan account
- Employment details
- Data that identifies computers or other devices you use to connect to the internet. This includes your Internet Protocol (IP) address.

If you choose not to give personal information

We may need to collect personal information by law, or under the terms of a contract we have with you.

If you choose not to give us this personal information, it may delay or prevent us from meeting our obligations. It may also mean that we cannot effectively manage your account.

Any data collection that is optional will be made clear at the point of collection.

How long we keep your personal information

We will keep your personal information for as long as you are a customer of the Swift Group or, if you are not a customer, for no longer than is necessary.

After you stop being a customer, we may keep your data for up to 12 years for one of these reasons:

- To respond to any questions or complaints.
- To show that we treated you fairly.
- To maintain records according to rules that apply to us.

We may keep your data for longer than 12 years if we cannot delete it for legal, regulatory or technical reasons. If we do, we will make sure that your privacy is protected and only use it for those purposes.

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How to get a copy of your personal information

You can access your personal information we hold by filling in by writing to us at this address:

Swift Group, Arcadia House, Warley Hill Business Park, The Drive, Brentwood Essex CM13 3BE

Or by e-mailing us at: info@swift.co.uk

Letting us know if your personal information is incorrect

You have the right to question any information we have about you that you think is wrong or incomplete. Please contact us if you want to do this.

If you do, we will take reasonable steps to check its accuracy and correct it.

What if you want us to stop using your personal information?

You have the right to object to our use of your personal information, or to ask us to delete, remove, or stop using your personal information if there is no need for us to keep it. This is known as the 'right to object' and 'right to erasure', or the 'right to be forgotten'.

There may be legal or other official reasons why we need to keep or use your data. But please tell us if you think that we should not be using it.

We may sometimes be able to restrict the use of your data. This means that it can only be used for certain things, such as legal claims or to exercise legal rights. In this situation, we would not use or share your information in other ways while it is restricted.

You can ask us to restrict the use of your personal information if:

- It is not accurate.
- It has been used unlawfully but you don't want us to delete it.
- It not relevant any more, but you want us to keep it for use in legal claims.
- You have already asked us to stop using your data but you are waiting for us to tell you if we are allowed to keep on using it.

If you want to object to how we use your data, or ask us to delete it or restrict how we use it or, please contact us.

How to withdraw your consent

Where we are processing your data on the basis of your consent, you can withdraw your consent at any time. Please contact us if you want to do so.

If you withdraw your consent, we may not be able to effectively manage your account. If this is so, we will tell you.

How to complain

Please let us know if you are unhappy with how we have used your personal information. You can contact us:

Compliance Director, Swift Group, Arcadia House, Warley Hill Business Park, The Drive, Brentwood Essex CM13 3BE

You also have the right to complain to the Information Commissioner's Office. Find out on their website how to report a concern: <https://ico.org.uk/concerns/>

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Security of Data

If you register to use online, password protected portions of the website we will ask you to provide us with certain up to date information about you, which we will handle in accordance with data protection legislation. We maintain strict security standards and procedures intended to prevent unauthorised access to your data and we use technologies such as data encryption and firewalls to achieve this. Any information you send to us is sent over a secure connection (the padlock symbol on your browser).

Use of Swift's website

When you visit our website we collect standard internet log information and details of visitor behaviour patterns. We collect this information to find out things such as the number of visitors to the various parts of the site and we do so in a way which does not identify anyone. Various parts of our website rely on us being able to accurately identify you and require you to enter certain personal, financial information, for example, when making a card payment, setting up a payment reminder or completing an income and expenditure form. The data you enter when utilising these facilities will be used for those specified purposes and for assisting Swift in managing your account only.

Cookie Notice

Cookies are small text files which are placed on your computer by websites that you visit. There are two main types: 'session' and 'persistent'. 'Session' cookies are temporary and only remain in the cookie file of your computer until you close your browser, when they are deleted. 'Persistent' cookies are stored permanently on your computer until they either expire or are deleted. Swift uses both types.

Cookies are widely used to enable the collection of information, to enable navigation around a website or to make websites work, or work more efficiently. To enhance a user's experience cookies can also be used to remember information so you do not have to retype it each time you visit a website, for example your name and email address, or to remember preferences like the language in which the website is displayed.

Swift also uses cookies to enable better understanding of how the website is used (for example which pages are seen, how often, return visits to the site), so that we can improve and tailor the content of the site, and also to help ensure the security and authenticity of our registration for access to secure areas of our site.

Swift does not use cookies to track your internet usage after leaving its website, nor does it use cookies which can store personal information about you which others could read and understand. Cookies cannot be used to access your computer and obtain information about you or read any material held on your computer. Cookies will not be used to contact you for marketing purposes.

Most web browsers are usually set up to accept cookies. You can delete cookies and you can usually adjust your browser so that your computer rejects cookies, but please note if you disable cookies you will not be able to register or log on to secure areas on our site. Information about cookies and how to reject them can be found from the Information Advertising Bureau at www.allaboutcookies.org

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