

Privacy Notice

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1. INTRODUCTION

We at Glow Financial Services Limited the “Company”, “Glow”, “we”, “us” or “our”) are committed to protecting the privacy and security of your personal information and ensure that all personal data handled by us is done so in accordance with the applicable data protection laws and regulations and guidance laid out by the Information Commissioner’s Office (ICO).

This Privacy Notice (“Notice) explains how we collect, use, and disclose personal information about you when you apply for financing or a loan for products, services and/or subscriptions from our clients (“Clients”).

This Notice explains how we obtain, process and share personal data about consumers and relates to the fraud prevention services that we provide to each Client who is offering the finance for products, services and/or subscriptions you buy from them. For information relating to how we use personal data in connection with your use of our website and the cookies used, please refer to our Notice at [link to privacy policy relating to website use].

For the purpose of applicable data protection law, including the Data Protection Act 2018 and UK GDPR (together, “DP Law”), Glow is the data controller of your personal information that we collect, hold, and process.

This Notice was last updated [August 2023].

2. ABOUT GLOW

Glow Financial Services Limited is a company registered in England with Company No. 09127663. Our contact details are as follows:

Name: Glow Financial Services Limited

Address: 71 Queen Victoria Street London EC4 4AY

Phone Number: +44 (0)2071268167

E-mail: dataprotection@glowgfs.com

We are authorised and regulated by the Financial Conduct Authority (Reference Number: 751308). The register can be accessed through . Find out more about Glow on <https://www.glowfinsvs.com/> .

3. WHAT INFORMATION DO WE COLLECT ABOUT YOU

By personal information we mean all personal information about you that we collect, use, share and store. This may include:

- your name, surname and title;
- your date of birth;
- your contact details such as your email address, telephone number(s), and home address;
- your residential status and address details for the last 3 years;
- your delivery address;
- a copy of your identification documents (such as a passport or driving licence);
- your occupation and annual income;
- your employment status;
- your employer details;
- products or services being purchased;
- your agreement number with Client;
- your bank details, including: your bank name and address, sort code and account number.

We may also collect the following information:

- information that allows us to validate your personal data obtained;
- information which we obtain from fraud prevention agencies (see the section on ‘Fraud Prevention Agencies’ below);
- and

- information relating to your access and use of our services (e.g., your IP address, your location and the device and software being used).

Glow does not collect any special categories of information.

4. WHERE WE COLLECT INFORMATION FROM

We collect information from a number of sources, including:

- when you apply for products and services including a loan with our Client, through their platform; and
- fraud prevention agencies.

We may combine your personal information from multiple sources.

5. WHY WE NEED THIS INFORMATION AND WHAT WE USE IT FOR

Personal information will be collected primarily from you in order for us to validate your identity and prevent fraud. In particular, we process your personal data for the following purposes:

- Glow's legitimate interest to assist with the prevention and detection of fraud (Glow's services benefit individuals by preventing fraudulent applications from being accepted);
- Glow's legitimate interest in providing the fraud prevention services securely for our Clients and detecting and avoiding fraudulent use of Glow's services;
- Glow's legitimate interest for the purpose of administration and improving our services;
- for performance of any pre-contract steps with respect to the loan application or financing solution that you have applied for with our Client.

How we use automated decision-making

As part of our processing of your personal information, we may take decisions by automated means. You may be automatically considered to pose a fraud risk if our processing suggests fraudulent activity which may mean you are found to not be eligible for a loan or financing for our Client's products, services and/or subscription, resulting in your application being rejected.

The logic involves data matching which compares sets of data, such as your phone number against other records held by the same or another body to see if they match. The data is usually personal information. The data matching allows potentially fraudulent applications to be identified and for your application to be potentially declined. It also allows us to identify non-fraudulent activity.

You have rights in relation to automated decision making (refer to section 'Your legal rights in relation to your information').

6. WHO WE SHARE INFORMATION WITH AND WHY

To process your application, we may share relevant information with:

- Fraud prevention agencies;
- Our other service providers, only where this is necessary to do so for the purposes of carrying out the fraud prevention;
- Our Client whom you have requested to enter into an agreement with;
- Regulators and enforcement agencies (e.g., the FCA and the police).

Why we share your information with Fraud Prevention Agencies

We may process and share your information with fraud prevention agencies on the basis that we have a legitimate interest in preventing fraud and to verify identity, to protect our, or our Client's business, and to comply with laws and regulations. Such processing may also be a contractual requirement for us enable our Client to provide the product you have applied for, or to open your account relating to that product. These checks will be undertaken during the pre-acceptance stage or periodically at other stages after loan activation to fulfil our legal and regulatory obligations. If fraud is suspected at any time, you could be refused a loan provided by our Client, or have it withdrawn.



The personal information we share with fraud prevention agencies may include information collected directly from you or indirectly through our partners, such as:

- your name;
- date of birth;
- home address and address history;
- contact details such as email address, home and mobile telephone numbers;
- financial information; and
- employment details.

We, and fraud prevention agencies, will use this information to prevent fraud and financial crime, and to verify your identity. Glow and fraud prevention agencies may also enable law enforcement agencies to access and use your personal information to detect, investigate and prevent crime.

Fraud prevention agencies may hold your personal information for different periods of time, depending on how that data is being used.

A record of any fraud risk will be retained by the fraud prevention agencies and may result in others refusing to provide services, financing, or employment to you.

When we may share with third parties

Sharing information with our Client:

We may share your personal information with the relevant Client and its authorised resellers under the terms of our agreements with such Client or reseller for the purposes of fraud prevention and for the processing and fulfilling your purchase of products, services, subscriptions and/or related activities. We may also share your personal information with the relevant Client or the relevant reseller for the purposes of such Client or the relevant reseller to contact you with marketing promotions.

How we share your information within Glow

We may share personal information within Glow for the purposes stated above. Your personal information will be made available only on a 'need-to-know' basis. Please note that certain individuals who will see your personal information may not be based at the Group or in your country (please see section "Using information outside the UK").

7. USING INFORMATION OUTSIDE THE UK

Glow may need to transfer your information outside the UK to service providers, agents, or subcontractors and in order to carry out the fraud prevention services and carrying out Glow's services for our Clients. In some cases, data protection laws outside of the UK may not provide the same level of protection as those in the UK, such as the USA. Where we share your personal information with service providers, agents or subcontractors located in a country that has not been approved by the authorities as having a suitably high standard of data protection law, we will use specific contracts (known as Standard Contractual Clauses) approved for use in the UK, and if necessary additional supplementary measures, which give personal data the same protection it has in the UK.

Please contact our DPO at dataprotection@glowgfs.com if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

8. HOW LONG WE HOLD INFORMATION

We will retain information for no longer than is necessary (see section titled "Why we need the information and what we use it for"). This means that we may continue to hold some information for a maximum of 7 years after your loan with our Client is repaid.

If you would like any further information about how long we hold your information, please contact our DPO by email at dataprotection@glowgfs.com

9. KEEPING YOU UP TO DATE

We keep this Notice under regular review. We may change this Notice from time to time by updating it to reflect changes in the law and/or our privacy practices. The date at the top of this Notice will be updated accordingly and we encourage you to check this from time to time for any updates or changes. Where you have provided us with your email address, we may also contact you to let you know that we have updated the Notice. We may also take that opportunity to ask you if you would like to update your marketing preferences.

10. YOUR LEGAL RIGHTS IN RELATION TO YOUR INFORMATION

You have a number of rights under DP Law that you may wish to exercise:

- the right to access or obtain copies of your personal information;
- the right to rectification, you have the right to request inaccurate information about you corrected;
- the right to request restriction of processing concerning you or to object to processing of your personal data;
- the right to request erasure of your personal data where it is no longer necessary for us to retain;
- the right to object to automated decision-making;
- the right to data portability including to obtain personal data in a commonly used machine-readable format in certain circumstances such as where our processing of it is based on your consent;
- the right to withdraw consent to any processing for which you have previously given that consent (regardless of our legitimate interest).

Where you exercise any of your rights, you have the right to be informed about the possible consequences of such exercise.

Please contact us at dataprotection@glowgfs.com if you would like to exercise any of your rights in relation to your personal information. You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we are allowed under DP Law to charge a reasonable fee if your request for access is manifestly unfounded or excessive. Alternatively, we can refuse to comply with the request in such circumstances.

We sometimes need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is an appropriate security measure to ensure that your personal information is not disclosed to any person who has no right to receive it.

We will act upon the request without undue delay and at the latest within one month of receipt. We may extend the time to respond by a further 2 months if the request is complex or we have received a number of requests from the same person. However, in those circumstances we will let you know without undue delay and within one month of receiving your request and explain why the extension is necessary.

It is also important that the personal information we hold about you is accurate and current. You need to keep us informed if your personal contact information changes by emailing.

Without prejudice to any other administrative or judicial remedy you might have, you have the right to lodge a complaint with the Information Commissioner if you consider that we have infringed applicable data privacy laws when processing your personal data. The Information Commissioner's Office can be contacted using the following link: <https://ico.org.uk/>.

11. CONTACTING US FOR FUTHER INFORMATION

If you have any questions regarding our Privacy Notice, please email us at dataprotection@glowgfs.com.

Glow Financial Services Limited ("Glow"), 71 Queen Victoria Street London EC4V 4BE. Registered in England No. 09127663. Glow is authorised and regulated by the Financial Conduct Authority (Reference No. 751308). The register can be accessed through www.fca.org.uk.

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