



# MA Website Privacy Information Notice



# Privacy Information Notice

We care about your privacy rights and how we use and share the personal data you provide to us. This Privacy Notice describes who we are and how we collect and process your personal data through our website and operational interactions with you.

- Data controller information
- What personal data do you collect?
- How and why we use your personal data
- What about cookies and other electronic identifiers?
- Who do we share your personal data with?
- Do you transfer my data outside of the European Economic Area, Switzerland or the UK?
- How do you keep my personal data secure?
- What are my rights?
- How long do we keep your personal data?
- Changes to this Privacy Notice
- Our Data Protection Manager's contact details.

MA UK Operations Ltd and MA UK LPF Ltd (MA UK) are data controllers of personal data collected and processed through our websites and via our operational interactions with you.

MA UK is registered with the UK Information Commissioner's Office as follows:

- MA UK Operations Limited: Registration Reference ZB062719.
- MA LPF Limited: Registration Reference ZB062738.

## What Personal Data Do You Collect?

We collect the following types of personal data so we can perform our business activities and to provide, and continually improve, our services:

- **Information you give us:** We receive and store any personal data you provide to us when you contact us to enquire about, or ask us to provide, our services to you. This includes when you:
  - Interact with our website to learn about our services
  - Enquire about our lending services
  - Apply for funding for your organisation
  - Set up an account with us on our Loan Management System and customer portal

- Communicate with us by phone, email, or otherwise
- Request customer or technical support
- Express an interest in working for MA UK

As a result of these actions, you might supply us with personal or business email addresses, your name, job title and contact telephone numbers, or your CV when applying to work for us. We create a unique user ID for you when you are approved to access our Loan Management System and Customer Portal.

- **Automatic information:** We do not automatically collect or store information about your use of the MA UK website. Unlike many websites, we do not use cookies or other unique identifiers to obtain certain types of information when your web browser or device accesses our website and application services. As we do not use cookies, we do not have a Cookie Policy.

## How and Why We Use Your Personal Data:

We process your personal data to operate, provide and improve the services that we offer our customers. These purposes include:

- **Establishing our service relationship with you.** We use your personal data in a business-to-business (B2B) context to establish our business relationship with you (or your employer), to negotiate business relationships such as setting up lending agreements, supplier agreements and other partnerships that enable us to provide the services that you or your employer has requested. We rely on the lawful basis of the processing being necessary 'in performance of a contract' with you (or your employer).
- **Managing our accounts and records.** We use your personal information to inform you about service changes, and other relevant service announcements and provide customer support. We rely on the lawful basis of the processing being necessary 'in performance of a contract' with you or when you ask us to enter into a contract for our services.
- **Provide help, troubleshoot, and improve our services.** We use your personal data to provide functionality, analyse performance of our IT systems, fix errors, and improve usability and effectiveness of our services and applications, as well as personalise your experience when you engage with us. Our loan management system creates logs of all user actions performed on the system. We also rely on the lawful basis of 'in performance of a contract with you' for this processing.

- **Comply with legal obligations.** In certain cases, we may collect and use your personal data where we are required to do so to comply with other laws and regulations. For example, for financial protection, fraud prevention and credit risk management activities imposed upon us by the UK Financial Conduct Authority.
- **Recommendations and personalisation.** We may use your personal data to communicate with you in relation to our services (e.g., by email and phone) including recommending features and other services that might meet your needs. It is in the 'legitimate interests' of our business to promote our services in this way but, where this activity represents a direct marketing purpose, you will be asked to provide your consent (i.e., 'opt-in') to marketing communications. You may withdraw your consent at any time and we will stop processing your data for that purpose.
- We do not use your personal data to advertise unrelated or third-party products or services.
- We do not sell your personal data to other organisations.
- We do not process special category personal data except where we are required to do so in relation to a legal or regulatory requirement, such as anti-money laundering and prevention or detection of crime (fraud).

## What About Cookies and Other Identifiers?

We do not use cookies or similar tools.

## Who Do We Share Your Personal Data With?

Information about our customers is an important part of our business. Like most organisations, we may employ other companies and individuals to perform processing activities on our behalf. Examples include your lender, partners that provide IT cloud hosting and data storage, IT system administration, credit search agencies and accountants. These third-party service providers may have access to the minimum personal data needed to perform their functions, but only where necessary. They are governed by contractual agreements that prohibit them from using your personal data for any other purpose and only in accordance with our written instructions, and as permitted by applicable data protection laws.

## Do You Transfer Personal Data Outside of the European Economic Area, Switzerland or the UK?

The personal data you provide or generate when using our services is managed and stored in the UK, and your rights and freedoms over the processing of your personal data are protected under the UK Data Protection Act 2018 (UK GDPR). If it becomes necessary to transfer your data to a third country, we will ensure that your rights remain protected in accordance with this Privacy Notice and as permitted by the applicable laws on data protection.

## How Do You Keep My Personal Data Secure?

We design our systems with your security and privacy in mind. As such:

- We work to protect the security of your personal data during transmission by using encryption protocols and security software. We also use anonymisation techniques to ensure you cannot be identified from data we share with your lender.
- We maintain physical, technical and organisational security measures to keep your data as safe as possible and we may ask you to verify your identity before we disclose personal data to you.

## What Are My Rights?

- If you have any questions or concerns about how we collect and process your personal data, please contact us in the first instance at the address below and we will endeavour to answer your questions or resolve your concerns. If we are unable to do so, you have a right to complain to the UK Regulator, the Information Commissioner's Office (ICO) at [www.ico.org.uk](http://www.ico.org.uk).
- You have a general right to be informed about who and why someone is processing your personal data. This Privacy Notice provides that transparency.
- As described above, you can choose not to provide certain information. However, you then might not be able to take advantage of some of our services.
- You can add or update certain information or have inaccuracies rectified.
- If you do not want to receive marketing emails or other unnecessary (non-service related) communications from us, you can adjust your mailing preferences at any time.
- You have additional rights relating to profiling and automated decision making. For example, you can ask for automated decisions made about you to be explained. We do not use your personal data to make any automated decisions about you and do not use any artificial intelligence software or perform profiling activities.
- In addition, subject to applicable law, you have the right to request access to, and erasure of your personal data, and a limited right to ask for your data to be passed to another data controller without restriction (data portability). You may also object to our processing of your personal data or ask that we restrict the processing in certain instances. If you wish to action any of the above rights, including to submit a data subject access request, please contact us at the address provided below. Such requests are fulfilled free of charge.

## Are Children Allowed to Use Your Services?

We do not intentionally collect personal data relating to children.

## How Long Do We Keep Your Personal Data?

We keep your personal data in an identifiable form only for as long as it is necessary to fulfil the relevant purposes described in this Privacy Notice, and as may be required by law, such as retention for tax and accounting purposes, or as otherwise communicated to you.

If you express an interest in working for us, or apply for an advertised position, we will retain your CV for a maximum period of 12 months. If we would like to keep your CV and contact information for longer, for future recruitment purposes, we will ask you to provide your consent for this.

## Changes to this Privacy Notice

We are not responsible for the privacy policies of other websites you may visit when you follow any link from our site. We encourage you to read the privacy notices published by other websites before providing any personal data. We may occasionally change this Privacy Notice to reflect changes to our business operations, including if we are acquired by another organisation or sold, and to maintain transparency of our processing of personal data. Where necessary, those changes will be published on our website.

Our Data Protection Manager's Contact Details:

[cyrus.kateli@mafinancial.com](mailto:cyrus.kateli@mafinancial.com)



MA Financial Group