

# Initial Disclosure Document

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## Who we are

EFT Finance Limited Company Registration Number 07215828. Registered office: Solo House, The Courtyard, London Road, Horsham, West Sussex, RH12 1AT. Main trading address: Milnwood, 13 North Parade, Horsham, West Sussex, RH12 2BT.

EFT Finance Limited is authorised and regulated by the Financial Conduct Authority, Registration No. 667290. Not all our credit broking activities are regulated by the Financial Conduct Authority. Please ask your EFT Finance Limited contact for any further information.

EFT Finance is an independent credit broker, not a lender and has commercial relationships with a number of lenders. EFT Finance can introduce you to potential funder(s) on our lending panel. We will consider various factors such as your financial position and product terms in deciding which funder to introduce you to. Please consider alternative finance options available to you before you enter into an agreement.

## Commission Arrangements

EFT Finance do not charge you a fee for our services. If you sign an agreement with the funder we introduce you to, they will pay EFT Finance a commission for our work.

The commission will be calculated as a percentage of the amount borrowed. The funder will set the interest rate payable by you and is not influenced by EFT Finance. The amount of commission affects the amount that you will be paying under your agreement. The commission amount will be confirmed to you before you sign the agreement. Each funder will notify you in a commission disclosure document and/or on the agreement the amount of commission and their method of calculating commission.

If you have any questions or require any further clarification, please contact your contact at EFT Finance.

## Privacy Policy

This privacy policy explains how we and potential funders use the personal information we ask you to provide. Please distribute this document to all directors and partners (where applicable). Please carefully read this policy and if you have any questions, contact us on [compliance@eftfinance.co.uk](mailto:compliance@eftfinance.co.uk). By sending us the information we have requested, we understand that you have read and are happy with the processing detailed in this privacy policy.

Our legal basis for processing your information, under the UK's data protection laws, is the **Legitimate Interests** basis. You provide us with your information so that we may seek suitable financing for your needs.

We may also ask if you have any circumstances affecting your health or finances that you would like to make us aware of. Any information given will help us and the funder(s) support you better on your financial journey. We would need your **Consent** to record this information and to pass it onto any funder approached on your behalf. If you prefer to inform the funder directly, we will be happy to provide you with the necessary contact details.

We may also use the data we collect from you or obtain from specialist data broking services for direct marketing of our finance broking services. Our legal basis for direct marketing is **legitimate interests**.

## What information we may need from you

The following are examples of the information we may ask you to provide:

- Your full name and home address
- Your date of birth
- A copy of your passport
- A copy of your driving licence
- A recent utility bill detailing your home address
- Details of your personal means and liabilities
- Any additional support you may need

## Information from other sources

We may also obtain information from other sources, for example:

- Companies House
- Your website and social media
- Specialist provider of company credit analysis
- Specialist provider of data broking services
- Government sites such as VOSA

## How we will use your information

We use Customer Relationship Management tools (CRM's) to record, for example: your contact details, details of any promotional material you may have received and any requests not to be contacted.

We will pass your information on to potential funder(s). Please contact either our Data Protection Officer on [compliance@eftfinance.co.uk](mailto:compliance@eftfinance.co.uk) or your usual EFT Finance Limited contact, if you would like to know all the potential funders approached on your behalf. EFT Finance Limited strongly recommends that you review the Privacy Policy notices on the websites of any funders approached on your behalf.

We will never sell your information to third parties for marketing purposes.

Potential funders:

To process your application, the potential funder(s) will perform credit and identity checks on you and your business partners. They will send the information on your application to one or more Credit Reference Agency (CRA). The potential funder will then use the information provided by the CRA's to verify the data you have provided, assess your creditworthiness and if necessary, prevent criminal activity.

In their data protection notices, potential funders will state if they use automated credit assessment and decision making or use personal data for marketing and related activities. You have a right to ask any funder(s) approached on your behalf to manually review any automated decision and you have the right to object to your information being processed for marketing or marketing related activities.

Credit Reference Agencies:

CRA's will record the information about you, your business and its proprietors they receive from the potential funders. When the CRA receives a search from a potential funder, they place a footprint on your credit file which may be seen by other lenders. The CRA's may supply the potential funder with both public (including electoral

register) and shared credit, financial situation and financial history information and fraud prevention information.

If you are a director, the potential funder may seek confirmation, from CRA's, that the residential address you provide is the same as that shown on the restricted register of directors' usual addresses at Companies House. The potential funder may search all directors as individuals as well as in their capacity as directors / guarantors.

If you are making a joint application or you tell us that you have a spouse or financial associate, you must discuss your funding requirements with them before we send the application to a funder, as the CRA's may link your records together.

If you borrow from a funder, the details of your accounts and how you manage it/them will be passed onto CRA's. If you borrow and do not repay in full and on time, CRA's will record the outstanding debt and may supply this information to other organisations or Fraud Prevention Agencies (FPA's) who may perform similar checks to trace your whereabouts and recover debts that you owe. Records remain on file for 6 years after they are closed, whether settled by you or defaulted.

If you provide false or inaccurate information and there is any suspicion of fraud, CRA's will record this and may also pass this information to FPA's and other organisations. If your request for funding is declined, the decline may be recorded on your credit record.

Finance companies use different CRA's and some of them are listed below. Details about these CRA's and their data protection policies can be obtained from these addresses which will take you to the same Credit Reference Agency Information Notice (CRAIN) document. If you wish to know specifically which CRA has been contacted, please ask us here at EFT Finance and we will find out for you.

- TransUnion (previously called Callcredit Limited): [www.transunion.co.uk/legal/privacy-centre?#pc-credit-reference](http://www.transunion.co.uk/legal/privacy-centre?#pc-credit-reference)
- Equifax Limited: [www.equifax.co.uk/privacy-hub/crain](http://www.equifax.co.uk/privacy-hub/crain)
- Experian Limited: [www.experian.co.uk/crain](http://www.experian.co.uk/crain)

The information held by the CRA's currently operating in the UK may not be the same. Should you wish to contact any of them it is worth considering contacting them all.

- TransUnion (previously Callcredit Limited) – Consumer Services Team – 0330 024 7574  
[UKConsumer@transunion.com](mailto:UKConsumer@transunion.com)
- Equifax Limited – [www.equifax.co.uk/Contact-us/Contact\\_Us\\_Personal\\_Solutions](http://www.equifax.co.uk/Contact-us/Contact_Us_Personal_Solutions)
- Experian Limited – <https://ins.experian.co.uk/contact>

## **Direct Marketing**

Where you receive direct marketing communication from us, you will be given the opportunity to opt-out of receiving further direct marketing from us.

Data obtained from a specialist data broker has been checked against the Telephone Preference Service and Corporate Telephone Preference Service registers and our Do Not Contact list.

You have the right to object to the processing of your information for direct marketing purposes.

## **How long we store your information**

Your information is stored in our live systems for 6 years from the end of our contact with you or the end of your

last finance agreement, whichever is longer. Data obtained from a specialist data broker will be retained for 2 years in our live systems.

We also store your information in encrypted back-ups. The back-ups are stored in a secure off-site location and will only be accessed for business continuity purposes. Information is deleted from the backups 10 years after the last processing of your data. It is not currently technically possible to delete individual records from the encrypted back-ups.

### **Your information security**

We take steps to protect your personal data against loss or theft, unauthorized access / disclosure / copying / use or alteration.

### **Access to your information and correction**

You have the right to request a copy of the information that we hold about you. If you would like a copy of some or all your personal information, please contact us:

- by email: [compliance@eftfinance.co.uk](mailto:compliance@eftfinance.co.uk)
- by post: EFT Finance Limited, Milnwood, 13 North Parade, Horsham, West Sussex, RH12 2BT

You have the right to ask us to update, correct or remove information you think is inaccurate or incomplete. Where you request changes to be made to the information that we hold, we will also advise any funders who hold your information. When your finance period ends or in the event of the funding not going ahead, you may ask us to erase your personal data.

### **Your right to erasure**

Should you exercise your right to have your data erased, we will remove your data from our live systems within one month of receiving a valid request. Our back-ups will only be accessed for emergency business recovery situations. Due to the nature of encrypted back-ups, it is not possible to delete your data within our back-ups within the same timeframe as our live systems. We are committed to the permanent deletion of individual encrypted information held in back-ups if, and when, this becomes possible.

### **Your right to object (legitimate basis processing only)**

You have the right to object to the processing of your information. We will stop processing your application for finance, unless there are legitimate reasons to continue, for example: the exercise or defence of legal claims.

### **Your right to withdraw Consent**

You have the right to withdraw your consent for our processing of your information regarding any additional needs you may have. We will continue to process your application for funding without the additional information and advise any funder who has been provided with the information of your decision to withdraw your consent.

### **Changes to our privacy policy**

This privacy policy was last updated 17 February 2025. We keep our privacy policy under review and will place any updates on our website [www.eftfinance.co.uk](http://www.eftfinance.co.uk).

## Complaints Policy

EFT Finance Limited aim to provide all our customers with the best levels of customer service and we will always want to hear when you feel that any service or product does not meet your satisfaction. You can let us know using any method e.g., verbally, by email, text or post. Please give us as much information as possible to enable us to investigate your complaint.

### Our Complaints Process:

#### The complaint handling process

After collecting as much information as possible from you, we will send you a letter to acknowledge receipt of your complaint and to confirm our understanding of the details. If your complaint may be covered by the Financial Ombudsman Service (an 'eligible complaint'), we will send you a copy of their leaflet. If you feel that our understanding is not quite right, please let us know. We will then investigate your complaint.

#### Complaints about finance providers

If you complain to us about a finance provider, we will check that we have all the details of your complaint and will then pass them onto the finance provider, who will follow their own complaints process and respond directly to you.

#### Timescales

If your complaint is about EFT Finance Limited and the Complaints Director can resolve your complaint within 3 working days, a Summary Resolution Communication will be sent to you which will include the following information:

- A summary of the complaint and the resolution.
- A statement that EFT Finance consider the complaint has now been resolved.
- If your complaint may be covered by the Financial Ombudsman Service, we will send you a copy of their consumer leaflet with the letter. If you are not satisfied with EFT Finance's Summary Resolution and you have the right to refer your complaint to the Financial Ombudsman Service, you must refer your complaint within six months of the date of our Summary Resolution Communication.

If your complaint cannot be resolved in 3 days, we will keep you informed with our progress and will work to resolve the matter as quickly as possible.

#### Final Response

We will endeavour to give you our findings and decision as quickly as possible. For an eligible complaint, we must give you our written Final Response within 8 weeks. The Final Response will include the following:

- A summary of the complaint.
- Acknowledgement of any mistakes made.
- Whether the complaint is accepted or rejected.
- Where applicable, the reasons for rejecting the complaint.
- Where the complaint has been accepted and we intend to offer redress or take remedial action, details will be provided.

- Where applicable, we will advise you how to complain to the Financial Ombudsman Services if you disagree with the EFT Finance Limited's Final Response.

Our contact details:

**Address:** Milnwood  
13 North Parade  
Horsham  
West Sussex  
RH12 2BT

**Telephone:** 01403 258934

**Email:** [compliance@eftfinance.co.uk](mailto:compliance@eftfinance.co.uk)

### Financial Ombudsman Service

The **Financial Ombudsman Service** is a free and easy-to-use service that settles complaints between consumers and businesses that provide financial services. EFT Finance will fully co-operate with the Ombudsman in resolving any complaints made against it and agrees to be bound by any awards made by the Ombudsman.

### Contact details for The Financial Ombudsman Service:

- **Online form:** <https://www.financial-ombudsman.org.uk/make-complaint>
- **Telephone:** 0800 023 4567
- **Calls using Relay UK:** (18002) 020 7964 1000
- **Email:** [complaint.info@financial-ombudsman.org.uk](mailto:complaint.info@financial-ombudsman.org.uk)
- **Accessibility:** <https://www.financial-ombudsman.org.uk/accessibility>
- **Facebook:** @financialombuds
- **Twitter:** @financialombuds
- **Website:** [www.financial-ombudsman.org.uk](http://www.financial-ombudsman.org.uk)

### Asking for Extra Help

There are times when we all need help. It could be that we have had health issues, been made redundant, or experienced other life events. We may need the help for a short period, or it may be a life-long need.

When you are looking to finance a purchase, EFT Finance and the proposed funder may be able to make your journey easier by, for example, providing documents in large print or in a format that can be screen read or by giving you more time to consider your options.

It is not always easy to ask for this extra help but rest assured that we and any funder we approach on your behalf, will keep confidential any information you give us and do our best to provide the extra help you need.

If you would like to have extra help, but you would prefer to give the funder this information directly, please ask your EFT Finance contact for the proposed funder contact details.