

Privacy Policy

MoneyThing is a trading name of MoneyThing Capital Limited (“**MoneyThing**”, “**us**”, “**we**”), a limited liability company registered in England and Wales, number 05254797. Our registered office address is 39 Church Crescent, Whetstone, London, United Kingdom N20 0JR. MoneyThing is authorised and regulated by the Financial Conduct Authority (“**FCA**”) under firm reference number 703549.

We are committed to protecting and respecting your privacy. For the purposes of the Data Protection Act 1998 (the “**Act**”), we are the data controller and we are registered with the Information Commissioner’s Office (registration number Z887547X).

We provide a platform (the “**Platform**”) via www.moneything.com (the “**Website**”) for lending and borrowing transactions conducted between our customers.

1 General

- 1.1 Please read this policy carefully as it sets out the basis on which we collect any personal information from or about you, and how we use it in the operation of the Platform. By visiting our Website or by using the Platform you are accepting and consenting to the practices described in this policy.
- 1.2 This policy covers:
 - (a) anonymous visitors to our Website (“**Guests**”); and
 - (b) registered users of the Platform.
- 1.3 A registered user of the Platform may be a:
 - (a) lender; or
 - (b) borrower.
- 1.4 Please note that certain parts of this privacy policy only apply to borrowers and other parts only apply to lenders. Where this is the case, we make it clear in the relevant paragraph.
- 1.5 As well as private individuals, lenders may be limited liability companies or limited liability partnerships. Borrowers will always be limited liability companies. In these circumstances, this policy will apply to, and 'you' and 'your' refer to, the individuals who are you as the lender or you as a director, partner or authorised person of the lending or borrowing entity.
- 1.6 If you have any questions about any aspect of this policy or do not agree with it, please contact us at MoneyThing, 39 Church Crescent, Whetstone, London, N20 0JR or support@moneything.com before using this Website.
- 1.7 We may change this privacy policy from time to time by updating this page, and where appropriate we will notify you by email. You should check this page from time to time to ensure you are happy with any changes.

2 What information do we collect from users of the Website, including Guests?

- 2.1 You can browse this Website as a Guest without giving us any information, and we won’t know who you are. However, even if you are a Guest, please bear in mind that we may:
 - (a) record the areas of the Website which you visit and at what times;

- (b) record information about your activities in using the Website; and
 - (c) collect information about your computer, such as which browser you are using, your network location, your operating system, your IP address and the type of connection you are using (e.g. broadband, ADSL etc.).
- 2.2 We collect the information above by using cookies. Please click here to access our Cookie Policy (<https://www.moneything.com/cookies-policy/>) which explains what cookies we use on our Website, why we use them and how you can control them.
- 2.3 We also store data that you submit to us via email, via our optional surveys, and through our contact form and email subscription sign-up form on the Website.
- 3 What information do we collect from borrowers and lenders?**
- 3.1 Additional services are available once you register with us and login to the Website. In this case, we will know who you are, your activities on the Website and information about your computer may be linked to you on our systems.
- 3.2 We will also store any data you upload to the Platform.
- 3.3 The types of information we may request from you are:
- (a) contact information – including your name, address, postcode and other contact information such as email address and telephone/mobile number and (where applicable) the contact details of your first of kin;
 - (b) the bank or building society account details to make or receive payments on the Platform;
 - (c) your passwords and security question answers;
 - (d) your financial interests, financial position, or loan repayment performance;
 - (e) answers to questions required by third party credit reference agencies for identification purposes;
 - (f) information about your activities in using the Website; and
 - (g) information from directors/individuals associated with you and/or your business.
- 3.4 We may retain copies of the following information about you:
- (a) any correspondence you send us, details of your registration history and any materials you post on the Platform;
 - (b) passports or other identification evidence that you provide for anti-money laundering and anti-fraud purposes;
 - (c) records of any surveys that you may be asked to complete for research purposes, although you do not have to respond to them;
 - (d) details of transactions you carry out through the Platform and the receipt and disbursement of repayments;
 - (e) details of your visits to the Website and the resources that you access;
 - (f) information about your physical or mental health or condition (where necessary and appropriate); and

(g) information relating to any criminal proceedings in which you have been involved.

3.5 If you give us false or inaccurate information, either directly or through an agent, and we suspect or identify fraud, we will record this.

4 Information from other sources

In relation to borrowers only we will also check information about you held on our own records and also obtain information from credit reference agencies about you and your financial associates' personal credit behaviour and personal credit accounts. We will also search at fraud prevention agencies for information on you and your financial associates and business partners.

5 What do we do with the information we collect from users of the Website?

The main reason we use this information is to provide you with both an improved website experience and details about our products and services, but we (or third party data processors, agents and sub-contractors acting on our behalf) may also use the information:

- (a) to enrich your experience and interaction with the Website by allowing you to store your details so that your preferences are retained when you revisit the Website;
- (b) to analyse site usage and improve our services;
- (c) to deliver to you any administrative notices, alerts and communications relevant to your use of the services; and
- (d) to contact you from time to time to inform you about new features, to troubleshoot problems, and to protect you against fraud or other criminal activity.

6 What do we do with the information we collect about borrowers and lenders?

We (or third party data processors, agents and sub-contractors acting on our behalf) may use this information to:

- (a) provide you with details about our products and services;
- (b) carry out financial and identity checks, fraud prevention checks, regulatory checks and credit checks, including by using scoring methods;
- (c) (in respect of borrowers) carry out credit checks;
- (d) (in respect of borrowers) check details on applications for credit and credit related and other facilities;
- (e) (in respect of lenders) check details on applications for lending and other related facilities;
- (f) manage your borrower or lender account with us and update the records we hold about you from time to time;
- (g) (in respect of borrowers) if you do not repay money you have borrowed, to trace your whereabouts and recover debts or enforce a loan agreement;
- (h) (in respect of borrowers) to provide you with information about goods or services offered by other companies that we feel may interest you. You will be contacted by electronic means (email or SMS) only if you have consented to this;
- (i) to carry out product development, statistical analysis and market research;

- (j) to develop and improve our services and products;
- (k) to update our records;
- (l) to advise you about the products and services that we are providing to you in response to a request from you about this;
- (m) to carry out checks required by applicable regulation or regulatory guidance;
- (n) to keep you informed about your loan agreements or security documents, as the case may be;
- (o) to allow you to participate in interactive features of the Website, when you choose to do so;
- (p) to make the Website available to you and to identify the products and services which you may be interested in;
- (q) for customer service, including answering questions and responding to feedback and complaints; and
- (r) for any other specific purposes in relation to your activities via the Platform.

7 Who do we share your information with?

- 7.1 We won't provide your personal information to other companies for their marketing purposes unless you have given us your consent. However, we may aggregate anonymised information based on your personal information and disclose this to advertisers and other third parties.
- 7.2 We may share your information with analytics and search engine providers that assist us in the improvement and optimisation of our site.
- 7.3 We may share your personal information with companies and other third parties performing services on our behalf (for example KYC service providers, credit reference agencies, customer relationship management providers or other service providers) who will only use the information to provide that service. We may also share your personal information with other members of our corporate group, or a purchaser or potential purchaser of our business.
- 7.4 We may share alerts and information derived from identity verification checks with third parties for the purpose of anti-money laundering and fraud prevention.
- 7.5 We may disclose your personal information on request to the FCA, Financial Ombudsman Service, the police or any other regulator or government authority in order to fulfil our regulatory responsibilities, to help prevent or detect fraud or any other type of crime or for any other reasonable purpose identified by the relevant authority.
- 7.6 We will not sell or disclose your data to any third party other than as set out in this policy.

Borrowers

- 7.7 In addition, we may disclose a borrower's personal information to:
 - (a) credit reference and fraud prevention agencies to perform similar checks, trace your whereabouts and recover debts you owe. This may include details of your loans on the Platform, how you manage them and any amounts outstanding; and
 - (b) debt collection agencies, security trustees and other legal representatives if required to enforce the terms of any loan agreement.

8 Where we store your personal data

- 8.1 The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("**EEA**"). It may also be processed by staff operating outside the EEA who work for us or for one of our sub-contractors. Such staff maybe engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.
- 8.2 All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.
- 8.3 Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

9 What credit reference and fraud prevention agencies do

- 9.1 When a credit reference agency receives a search from us they will:
- (a) place a credit search "footprint" on your credit file regardless of whether your application proceeds. If the search was for a credit application the record of that search (but not the name of the organisation that carried it out) may be seen by other organisations when you apply for credit in the future; and
 - (b) link together the previous and subsequent names advised by you, of anyone that is a party to the account.
- 9.2 Credit reference agencies supply the following information to us:
- (a) information about you, such as previous applications for credit and similar personal credit information in your name or in relation to your financial associates and business partners;
 - (b) public information such as County Court Judgments (CCJs) and bankruptcies;
 - (c) electoral register information on you and your business partners; and
 - (d) fraud prevention information.
- 9.3 Credit reference agencies will keep records of outstanding debt on file for six years after they are closed, whether settled by you or defaulted.
- 9.4 The information which we and other organisations provide to the credit reference agencies and fraud prevention agencies about you, your financial associates, your business partners and details about your business may be supplied by credit reference agencies and fraud prevention agencies to other organisations and used by them to:
- (a) prevent crime, fraud and money laundering by, for example checking details provided on applications for credit and credit related or other facilities;
 - (b) check the operation of credit and credit-related accounts;

- (c) verify your identity if you, your financial associates or your business partner(s) apply for other facilities;
- (d) make decisions on credit and credit related services about you, your financial associates and/or your business partners, or your business;
- (e) manage your personal, your financial associates, your business partner's and/or business credit or credit related account(s);
- (f) trace your whereabouts and recover debts that you owe;
- (g) conduct other checks to prevent or detect fraud; and
- (h) undertake statistical analysis and system testing.

9.5 If false or inaccurate information is provided and fraud is identified, details will be passed to fraud prevention agencies. Law enforcement agencies may access and use this information. We and other organisations may also access and use this information to prevent fraud and money laundering, for example, when:

- (a) checking details on applications for credit and credit related or other facilities;
- (b) managing credit and credit related accounts or facilities;
- (c) recovering debt;
- (d) checking details on proposals and claims for all types of insurance; and
- (e) checking details of job applicants and employees.

9.6 Please contact us if you want to receive details of the relevant fraud prevention agencies.

9.7 We and other organisations may access and use from other countries the information recorded by fraud prevention agencies.

10 Disclosing information about other individuals

10.1 If you are a joint applicant, or if you have told us of some other financial association that you have with another person (for example financial associates), you must be sure that you are entitled to:

- (a) disclose information about your joint applicant and anyone referred to by you; and
- (b) authorise us to search, link or record information at the credit reference agencies about you and anyone referred to by you.

10.2 An association will be created by the credit reference agencies between joint applicants and between you and anyone you tell us is financially connected with you. This will link your financial records with that person and those records will be taken into account in all future applications either by you or both of you. This will continue until one of you successfully files a disassociation at the credit reference agencies, i.e. informing them that you are no longer connected financially with a particular individual.

11 Marketing and Communications

11.1 We would like to provide you with information about our new products, services, promotions, special offers and other information which we think you may find interesting.

11.2 If you have registered with us or have previously asked us for information on our products or

services, provided you have given us your consent, we may send you information on our range of products and services by phone, email and/or SMS.

- 11.3 If you decide at any time that you no longer wish to receive marketing phone calls, emails or SMS from us, please contact us by email at support@moneything.com or in writing to us at MoneyThing, 39 Church Crescent, Whetstone, London, N20 0JR. We will always give you an opportunity to unsubscribe from receiving any marketing from us in each communication we send to you.

12 Your Rights

- 12.1 You may request details of personal information which we hold about you under the Data Protection Act 1998 (the “Act”). The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you. If you would like a copy of the information held on you please contact us by email at support@moneything.com or in writing to us at MoneyThing, 39 Church Crescent, Whetstone, London, N20 0JR.
- 12.2 If you think any information we have about you is incorrect or incomplete, please email us at MoneyThing, 39 Church Crescent, Whetstone, London, N20 0JR or support@moneything.com as soon as possible. We will correct, delete or update any information as soon as possible.

13 Security

- 13.1 We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Website; any transmission is at your own risk.

14 Linking

- 14.1 We may link to other websites which are not within our control. In particular, we currently use the following third party solution providers:
- (a) www.thecashshop.net; and
 - (b) www.broadoakprivatefinance.com
 - (c) www.p2pindependantforum.com
- 14.2 Once you have left our Website, we cannot be responsible for the content of other websites or for the protection and privacy of any information which you provide on these websites. Please note that these websites have their own privacy policies and website terms and conditions. We do not accept any responsibility or liability for these policies. Please check their privacy policies and their website terms and conditions when you visit them and before you submit any personal data to these websites.