

## Information covered by this statement

This Privacy Statement applies to the use and processing of Personal Information collected and used by Oriel Finance LLP.

The phrases “Oriel”, “us” or “we” shall, when used herein, mean those members of the Oriel Group on behalf of and in respect of whom this Statement is made.

By using the Oriel websites and/or mobile applications or otherwise providing your Personal Information to Oriel, you agree to the collection, use and sharing of your information in accordance with this Privacy Statement. Please read this Privacy Statement carefully and **contact us** if you have any questions.

Personal information is information, or any combination of separate pieces of information, that could be used to identify you.

Should you have any queries in respect of this statement or our use of personal data, please contact us at [dataprotection@orielfinance.com](mailto:dataprotection@orielfinance.com)

## Information Oriel collects

We may collect information about you from a variety of sources. This includes information we collect directly from you; information we collect when you visit our sites, view our online content or use our mobile applications or other services; and information we collect about you from other sources.

### Information we collect directly from you

We collect information directly from you when you choose to participate in our offers and programs, create an account on our websites or in our mobile applications, call or email us, or otherwise provide information directly to us. The following are examples of information we may collect directly from you:

- Name
- Email address
- Postal address
- Username and password
- Telephone and/or fax number
- Date of birth
- Demographic information
- Payment information (such as a credit card) and bank account details
- Future communication preferences
- Telephone number and recordings when you call our customer service line

Information we collect when you visit our sites, view our online ads or promotions, or use our mobile applications or other services

We use cookies and other technologies to collect information when you visit our sites, view our online advertisements or promotions, or use our mobile applications or other services. The following are examples of information we may collect with these technologies:

- Information about your device browser and operating system
- IP address
- Web pages you view
- Links you click
- Oriel emails you open

## Information collected through Mobile Applications

When you download our mobile applications to your mobile device, we may also collect information that you provide. We also automatically collect information through our applications.

The following are examples of the types of information we may automatically collect through our applications:

- Marketing ID or similar identifier
- Information about your devices' operating system
- Information about the way you use the application

## Your Choices about information collection through Mobile Applications

You can opt out of continued information collection by our mobile application by deleting the application from your device.

## Precise Location Data

Our mobile applications may collect precise location information from your device if you consent to the collection of this information. We may use third-party service providers to provide location services using the location data you provide. You may opt out at any time to the continued collection of this information by adjusting the settings on your device.

## Information Oriel collects from other sources

We may obtain information about you from other sources, including publicly available sources, such as the Land Registry, social media platforms or referral agents, etc. Examples of information we may collect from other sources are:

- Name.
- Postal address.
- Email address.
- Date of birth.
- Income level.
- Publicly observed activities or information made available by you to the public, such as blogs, videos, internet postings, and user generated content.

## How Oriel uses this information

We use the information we collect to provide you products, offers and services, to deliver to you advertisements, offers or other content tailored to your interests, and to conduct other Oriel business operations. The following are examples of how we may use the information we collect:

- Answer your questions or respond to your requests.
- Develop new products and services.
- Enrol you in contests, programs, or offers that you request.
- Create and manage your account.
- Process payment for purchases or other services.
- Protect against or identify possible fraudulent transactions.
- Send you email and/or postal messages with information about Oriel brands and other content we think may be of interest to you.
- Telephone you about Oriel's brands and other content we think may be of interest to you.
- Develop and provide Marketing tailored to your interests, including interest-based marketing.

- Personalise your experience on our websites by presenting products and information tailored to you.
- Allow you to participate in social sharing on our websites.
- Analyse the use of, and develop, our products, services and marketing. Enforce our Terms and Conditions and otherwise manage our business.

Oriel will only process your information in pursuance of our legitimate interest if we receive any requests related to, for example, a product or service, a call-back, or specific marketing materials; we will use your personal information to fulfil your request. Where we need to manage your account and protect you against or identify possible fraudulent transactions, we will do so in accordance with our legal obligation placed on us under law. We will seek consent from you if we need to process your data solely identified purposes. To ensure meaningful consent is obtained from you, Oriel will provide you with reasonable notice ensuring that your consent is provided on an informed basis.

### **Information sharing**

The success of our business depends on your trust, and we do not sell your personal information to marketers outside of Oriel. We share your personal information within Oriel and as described in this statement. We do not share personal information with marketers outside of Oriel unless you consent to such sharing, or as described within this statement.

### **Co-promotions with Carefully Selected Business Partners**

We from time to time may collect personal and other information for a co-promotion or joint program with a business partner and share your information with that business partner. For these programs we will make clear at the point of collection that the information will be shared with Oriel and the participating business partner and ask for your consent as required by applicable laws.

### **Third-party service providers**

We engage third-party service providers to perform a variety of business operations on our behalf. In so doing, we may share your Personal Information with them. We provide our service providers with only the Personal Information they need in order to perform the services we request, and we contractually require that they protect this information appropriately and not use it for any other purpose.

For example, we may rely on a 3rd party service provider to:

- Fulfil your service requests and answer your questions.
- Host our sites and deliver our email or other communications.
- Contact contest winners, manage payments or take other actions on our behalf.
- Analyse our data, sometimes combined with data from other sources, to send you communications.
- Conduct research and analyse data to improve our products, services and sites.
- Perform other services that we request.

Where permitted by law, we combine Personal Information about you that Oriel has collected with Personal Information about you that a business partner has collected so we can jointly send tailored promotional communications to you. In such instances, our business partner will not be permitted to use Oriel data or the combined data for its own, independent marketing purposes. Our service provider will only be allowed to use the combined set of information to send you joint communications that we hope will be of interest to you. If you prefer not to receive these joint communications, you can always opt out by following the instructions provided in any such communication or through this Privacy Statement as indicated above.

### **Contact us to get a list of Oriel third party service providers**

## Other situations

We may transfer or otherwise process your personal information:

- As part of the sale of an Oriel brand to another company
- To protect, defend or exercise the rights and property of Oriel (including enforcing our Terms and Conditions)
- When required by law and/or government authorities

## Personal Information Retention Period

We will retain Personal Information for the period necessary to fulfil the purposes outlined in this Privacy Statement, unless a longer retention period is required or permitted by law.

## Aggregated and non-personal information

We share aggregated and/or anonymous information that does not identify you for Oriel business purposes. For example, we may disclose the number of visitors to Oriel sites or services. We may also share aggregated and/or anonymous information with our business partners for their own business purposes.

## Your communications options

We give you choices about how we communicate with you.

- **Email Communications**  
You can stop receiving promotional email messages from Oriel by following the opt-out instructions provided in any such message you receive.
- **Postal Mail**  
You can stop receiving promotional postal mail from Oriel by following the opt-out instructions that may be included within those communications. You can also stop receiving promotional email or postal communication through this Privacy Statement. Please [contact us](#) to opt out.
- **Mobile Text Messages**  
We only send you promotional mobile text messages if you explicitly ask to receive these (you opt in). You can stop receiving promotional text messages by following the instructions to opt out provided within that text messaging program.
- **Telephone Marketing**  
We only send you promotional mobile text messages if you explicitly ask to receive these (you opt in). You can stop receiving promotional text messages by following the instructions to opt out provided within that text messaging program.
- **PLEASE NOTE:**  
We will honour your request to stop receiving promotional email, text and postal messages from Oriel as practicable. However, we may continue to send you service-related communications. We may keep information for record keeping to ensure we fulfil your request not to send particular types of messages.

## You and your information

To the extent provided for by applicable law, you have certain rights in respect of the management of the personal data we hold about you.

### Access

- We take steps to keep your personal information accurate. Many Oriel programs provide access to view or update personal information you provided when you registered online. Check where you registered to learn if you can view or update your information there.
- If information access and update are not available where you registered, **visit Oriel** and contact us to learn how to access and/or update the personal information you provide to Oriel. Oriel does not charge for this service and responds to reasonable requests in an appropriate timeframe.

## Data Deletion

To the extent provided by applicable law, you have the right to request rectification of your personal data; to obtain restriction of the processing of personal data; to object to the processing of personal data (including direct marketing) and to data portability. To exercise any of these rights, please contact us as described below.

## Consent

Where you have provided consent for our processing of your personal data, you may withdraw that consent at any time by contacting us as described below. We will cease processing your personal data as soon as reasonably practicable following our receipt of your withdrawal.

## Complaints

- If you consider that we have processed personal data in violation of applicable law, please contact us as described below. If you consider that we have processed personal data in violation of applicable law and failed to remedy such violation to your reasonable satisfaction, you may also lodge a complaint with a supervisory authority (e.g. the Information Commissioner in the UK).

## Cookies and other Technologies

Oriel and our third-party service providers use a variety of technologies to assess how our sites or mobile applications are used, to personalise your experience and to deliver you marketing, including online content, tailored to your interests. Some technologies we may use include the following:

### Cookies

A cookie is a small file placed on your device when you visit a site that can be understood by the site that issued the cookie. We use the information collected by cookies to remember who you are to log you in and your preferences, to provide you advertisements, offers or other content tailored to your interests and to assess how our sites are used. You can accept or decline cookies through your browser settings. To learn more, please look at the cookie settings available in your specific web browser(s). Please note, however, that without cookies you may not be able to use all of the features of our Sites or other websites and online services. Please click [here](#) for a list of all Oriel Cookies.

### Other Technologies

In conjunction with gathering information through cookies, web beacons and Javascript, our web servers may log information such as your device type, operating system type, browser type, domain, and other system settings, as well as the language your system uses and the country and time zone where your device is located. We also may record information such as the address of the web page that referred you to our Sites and the IP address of the device you use to connect to our Sites. We may log information about your interaction with the Sites, such as which pages you visit. To control which web servers collect information by automated means, we may place tags on our web pages called “web beacons,” which are small files that link web pages to particular web servers and their cookies. We also may send instructions to your device using

JavaScript or other computer languages to gather the sorts of information described above and other details about your interactions with our Sites.

We may use third-party web analytics services on our Sites, such as those of Google Analytics. These service providers help us analyse how visitors use the Sites. The information obtained for this purpose (including your IP address and other information collected by automated means) will be disclosed to or collected directly by these service providers.

The providers of third-party plug-ins and widgets on our Sites, such as embedded videos and social media sharing tools, may use automated means to collect information regarding your use of the Sites and your interactions with the plug-ins and widgets. We may also receive information you have made available to those third party services, including the geographic location of your mobile device and other information about you (such as name, email address, gender, locale, time zone, languages, social media profile URL, personal website URL, biographical information, birthday, photo, list of devices, education history, work history, hometown, interests, current city, political views, favourite athlete and teams, relationship status and information, religion, name of significant other, and certain security settings information) and your contacts on those services. This information is subject to the privacy policies or notices of the third party providers of the plug-ins and widgets.

### **Interest-Based Marketing**

You may receive interest-based marketing, offers or other content as you interact with websites or mobile applications. Interest-based Marketing is online Marketing from Oriel brands and/or from our carefully selected business partners that is tailored to your interests and sent to your device using a cookie or other identifier assigned to your device. These cookies or other identifiers are placed in general interest categories that we infer from information such as:

- The web pages you view and links you click on Oriel websites and other websites you visit.
- Mobile applications you use.
- The Oriel brand emails you view and links you click in the email.
- Demographic data.
- Offline and online purchase data.
- We have designed our interest-based marketing systems to deliver such ads to you based only on data that does not personally identify you.

We respect your privacy.

You can limit your receipt of interest-based marketing on Oriel websites or in our mobile applications by different means.

Your choices regarding receipt of interest-based Marketing on websites

### **Your choices regarding receipt of interest-based Marketing in mobile applications**

Some newer mobile device operating systems allow you to limit the use of information to deliver interest-based marketing in mobile applications. You can check the settings on your device for such options in your devices' operating system.

### **Links to Third Party Sites and Social Media**

Oriel sites may include links to third-party sites. Oriel does not control these third-party sites, and we encourage you to read the privacy statement of every site you visit.

### **Social Networks and Third-Party Plug-ins**

Our websites may include plugins from social networks or other third parties. An example of a plugin is the Facebook “Like” button. Where legally permitted, these plugins may communicate with and send information to the party that provided the plugin, even if you do not click on the plugin. This information may include your IP address, information about your browser and device, and the address of the web page you are visiting on our site. Loading, using or clicking the plugins may also place, read and transmit cookies. These cookies may contain a unique identifier the social network or third party assigns to you. The loading, functionality and your use of the plugins are governed by the privacy statement and terms of the party that provided the plugin.

### **Social Network and Third-Party Login**

Our websites may allow you to log in using a social network or other third-party account. An example of a third-party login is “Log in with Facebook.” Logging into one of our sites with your social network or other third-party account may allow us to gather information that you give us permission to access from that social network or third party. The login feature may also transfer information to the social network or third party, such as your username and password, to authenticate you. The social network or third party may also automatically collect information such as your IP address, information about your browser and device, and the address of the web page you are visiting on our site. The login feature may also place and read cookies from that third party that may contain a unique identifier the social network or other third party assigns to you. The functionality of and your use of the login is governed by the privacy statement and terms of the party that provided the login functionality.

### **User Generated Content**

Please remember that any information you submit or post as user-generated content to Social Media sites become public information. You should exercise caution when deciding to disclose your personal, financial or other information in such submissions or posts. Oriel cannot prevent others from using such information in a manner that may violate this Privacy Statement, the law, or your personal privacy and safety. Oriel is not responsible for the results of such postings.

### **Information Security**

- Oriel is committed to keeping personal information secure. We have implemented technical, administrative and physical procedures designed to protect personal information from loss, misuse or alteration.
- We limit access to personal information to those who have a business need. We keep personal information only for so long as deemed reasonably necessary.

### **Data Transfers**

- We may transfer the personal information we collect about you to recipients in countries other than the country in which the information originally was collected. Those countries may not have the same data protection laws as the country in which you initially provided the information. When we transfer your information to recipients in other countries: (i) we will perform those transfers in accordance with the requirements of applicable law; and (ii) we will protect the transferred personal information in accordance with this Privacy Statement.
- We have implemented a General Data Transfer Agreement, procedures and controls to help ensure that personal information is protected no matter what country it is stored in or transferred to. Please [email us](#) for a copy of the GDTA.

## **Children's privacy**

Our Sites are not directed to children under the age of thirteen and we do not knowingly collect personal information from children under the age of thirteen on our Sites.

## **Links to other websites and apps**

Our Sites may provide links to other websites and apps for your convenience and information. These websites and apps may operate independently from us. Linked sites and apps may have their own privacy notices or policies, which we strongly suggest you review. To the extent any linked websites or apps are not owned or controlled by us, we are not responsible for their content, any use of the websites or apps, or the privacy practices of the websites or apps.

## **Updates to our Privacy Statement**

We will post changes to this Privacy Statement and indicate the effective date when this Privacy Statement is updated. If we make any material changes to this Privacy Statement, we will notify you by sending an e-mail to the e-mail address you most recently provided us or by posting notice of the changes on this site.

For further information concerning what Personal Data we hold about you, how you can access it and our use of Personal Data generally, please email [dataprotection@orielfinance.com](mailto:dataprotection@orielfinance.com)