



PRIVACY NOTICE

About Us

This is the privacy notice of Relendex Limited (“**Relendex**”, “**we**”, “**us**” or “**our**”). Our company registration number is 07486328 and our registered address is 45 Pall Mall, St James London SW1Y 5JG. For the purposes of the UK General Data Protection Regulation 2016/679 (“**UK GDPR**”), we are the data controller of the personal data that we collect about you or that you submit to us via our website, Relendex.com (the “**Website**”), telephone, email and any intermediary third parties.

Our ICO registration number is Z2708231.

We are committed to protecting your privacy and the security of the personal data we hold and process on your behalf. This privacy notice explains how we collect information, what we use the information for, our legal basis for doing so, and what rights you have.

We reserve the right to amend this privacy notice from time to time by uploading a new version on the Website. This privacy notice was last updated on **[24/06/21]**.

Contact details

If you have any questions about our privacy notice or your data, or to exercise any of your rights as described in this privacy notice or under data protection laws, you can contact us as follows:

Relendex Ltd
99-100 Turnmill St
Farringdon
London
EC1M 5QP

By email: info@relendex.com

What information do we collect from you?

Information you give to us

We may collect and process the following personal information about you:

- **General personal details**, which may include:
 - o Your name.
 - o Your residential address.
 - o Your contact details (email address and/or your telephone number).
 - o Your date of birth.
- **Account sign-in information**, which will include the following as set by you:
 - o Username.
 - o Password.
- **Communications you send to us** (by telephone, email or otherwise), for example, to report a problem or to submit queries, concerns or comments regarding the Website, our service, or general comments.
- **Credit check information**. If you represent the borrower, you may provide us with information about credit checks and other related information.

Information we collect about you

With regard to each of your visits to the Website, we may automatically collect the following information:

- **Technical information**, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system;
- **Information about your visit**, including the full Uniform Resource Locators (URL) clickstream to, through and from the Website (including date and time); services you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.

We may receive information about you if you use any of the other websites we operate or the other services we provide.

The information detailed above will not constitute personal data.

Information we receive from others

We are also working closely with third parties (including, for example, service providers, business partners, technical sub-contractors, payment and delivery services, advertising networks, analytics providers, search information providers and credit reference agencies) and may receive information about you from them.

What we do with your data?

We use your personal data for the following purposes:

For Lenders

We need to process certain personal information in order to provide our services to you, which includes setting up and administering your account, facilitating loans and administering these on your behalf, and complying with legal and regulatory requirements including compliance with our obligations under anti-money-laundering (“**AML**”) legislation.

We may also, to comply with regulatory obligations, obtain, process and use your basic data alongside special categories of Personal Data which are more sensitive in nature. This is to ensure we are complying with regulatory ‘Know Your Customer’ (“**KYC**”) checks. “**KYC**” refers to the steps taken by a financial institution (or business) to:

- Establish customer identity
- Understand the nature of the customer’s activities (primary goal is to satisfy that the source of the customer’s funds is legitimate)
- Assess money laundering risks associated with that customer for purposes of monitoring the customer’s activities

Relendex has a policy of retaining all documents used in the ordinary course of business, including account opening notes, details of investment business conducted, compliance related records and those of an administrative nature for a period of three years beyond the termination of a client’s business relationship.

Know Your Customer (**KYC**) documentation is retained for 5 years following the termination of a Lender business relationship with Relendex.

For Borrowers

We need to process certain personal information in order to provide our services to you, which includes conducting due diligence, credit checks and other creditworthiness assessments on your company and/or individuals, listing your loan opportunity on our platform, and facilitating and administering loans made to you. We also need to process certain information in order to comply with our legal and regulatory obligations including compliance with our obligations under **AML** legislation.

Providing our services to you

As a peer-to-peer commercial real estate lending platform, we need to process personal information as and when required from time to time in order to provide our services to lenders and borrowers.

Contacting you about our services

If you have given us your contact information, we may use these details to get in touch with you about the services we offer such as by following up on an incomplete registration process or to email you details of offers you may be interested in.

You may opt out of this at any time by telling us, or if we have contacted you via email, you will be given an option to opt out by clicking the relevant email link.

Improving our services

We may use your personal data to analyse how you are using the Relendex service and to gain insights into how we can improve our products and services.

Customer Support and account administration

We may use your personal data to provide you with customer support or to investigate complaints or concerns about your account.

Related products and services

We may use your personal data to provide you with information on related products and services that you may be interested in, such as home contents insurance or utility providers. This information will be provided electronically, either via our website, app, or email.

We will not transfer any of your personal data to third parties for this purpose unless you give us your explicit consent.

Our lawful basis for processing your personal data

Under UK GDPR we are required to tell you about the legal basis under which we collect and process your data.

We will only collect and process your personal data in accordance with one of the below lawful bases:

- **Performance of a contract:** This is where the processing is necessary for a contract we have with you, or you have asked us to take specific steps before entering into a contract, such as providing you with a quote. This lawful basis covers the following purposes:
 - o Providing our services to you.
- **Our legitimate interests:** This is where we collect and process data in accordance with our “legitimate interests”. Our legitimate interests include:
 - o Improving our service.
 - o Providing you with marketing information about our services.
 - o Providing you with customer support and administering your account.
 - o Providing you with information about related products and services offered by Relendex.
 - o Providing you with information about related products and services offered by our commercial partners.
 - o Carrying out due diligence, credit checks or other creditworthiness assessments on you as part of your being an employee, officer or director of the borrower we are providing a service to.
- **Consent:** You may be given the option to explicitly consent to share your data with selected third parties for marketing purposes or to sign up for related products and services. This will be via a separate notice via the Website or app. **We will never assume that we have your consent unless you have explicitly opted in, and you can withdraw your consent at any time by contacting us.**

- **Compliance with our legal obligations:** We may be required to process or share your personal data in compliance with a legal obligation, such as in response to a request by law enforcement or when investigating a civil claim.

Data storage and international transfers

We take the security of your data very seriously, and all of your personal data will be kept according to strict safeguards and in compliance with the UK GDPR. Your data will be hosted on servers located within the European Economic Area (“EEA”) and we will only transfer your data outside the EEA in the event that the jurisdiction in question has been determined by the European Commission as providing adequate levels of protection for personal information.

Where we need to transfer your data to, and store your data in, a country not determined by the European Commission as providing adequate levels of protection for personal information (because, for example, we have decided to engage a service provider with servers located outside the EEA), we will take all necessary steps to provide appropriate safeguards to protect your personal data.

Automated decision making

When you enter in your personal details to obtain an initial quote using the Relendex service, our technology uses this to automatically enter details of automated process if applicable. This does not affect your legal rights.

Disclosure of your personal data to third parties

Personal data may be shared with our third party service providers and business partners who assist with the running of the website and the operation of our business which include hosting providers we may engage from time to time. Our third party service providers and business partners are subject to security and confidentiality obligations and are only permitted to process your personal data for specified purposes and in accordance with our instructions.

In addition, Relendex may disclose information about you:

- To our professional advisers including lawyers, auditors and insurers.
- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If all or substantially all of Relendex’s assets are acquired by a third party, in which case personal data held by it will be one of the transferred assets.
- To enforce or apply our contracts or to establish, exercise or defend the rights of Relendex, its staff or other related persons.

Your rights

You have the right to be informed over what personal data we hold and how we are using it. This information is contained within this privacy notice.

If you have consented to particular uses of your personal data, you have the right to withdraw this consent at any time.

You have the right to “portability” of your personal data that we have collected with your consent or in performance of a contract that is used in automated decision-making. This means that you can request copies of all the personal data we hold for this purpose in a structured, commonly used, and machine readable form, and we will supply this to you free of charge on request. We will respond to these requests within one month, unless the request is particularly complex, in which case we will inform you of how long it will take as soon as possible.

You have the right to request a copy of the personal data we hold about you. We will comply with all subject access requests within 30 days, unless the request is particularly complex; in this case we will contact you within 30 days with further information. You will not be charged for making a subject access request unless we reasonably deem this to be a manifestly unfounded or excessive request, in which instance you will be charged a reasonable fee based on the administrative costs of providing the information.

If some of the personal data we hold is inaccurate or incomplete, you can request that we rectify our records by writing to us. We will comply with all requests within 30 days unless the request is particularly complex; in this case we will contact you within 30 days with further information.

Where we are using your personal data in accordance with our legitimate interests, you can object to further use of your data. This objection should be based on grounds relating to your particular situation. If you object, we will stop using your personal data in this way immediately, unless there are compelling legitimate grounds for processing your personal data which override your interests, rights and freedoms (such as requests by law enforcement) or we need to process your data for the establishment, exercise or defence of legal claims.

In certain circumstances, you have the right to:

- Request the erasure of your personal data: this enables you to ask us to delete or remove personal data where there is no good reason for us to continuing to process it (“**right to be forgotten**”).
- Restrict the processing of your personal data.

Please note that the above rights are not absolute and we may be entitled to refuse requests, wholly or partly, where exceptions under the applicable law apply. For example, we may refuse a request for erasure of personal information where the processing is necessary to comply with a legal obligation or necessary for the establishment, exercise or defence of legal claims. We may refuse to comply with a request for restriction if the request is manifestly unfounded or excessive.

How long we will keep your data for

We will only keep your personal data for as long as is necessary. This means that we will retain your personal data for as long as we have an active contract or business relationship with you, and after this, we will only keep your data for as long as is reasonably necessary to fulfil the purposes we collected it for. This includes for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

What happens if you don't provide us with the information we need

As outlined above, some of the personal data you provide to us will be used in order to enter into a contract with you and to comply with our legal obligations.

Should you not provide us with the data we require to offer our service or request that we erase the personal data we hold, it is likely that we will not be able to deliver our services to you.

Complaints

If you feel that we have not been complying with our obligations on data protection law or you wish to assert one of your rights, please contact us without delay using the contact details provided above.

Should you be dissatisfied with our response or wish to complain to the relevant supervisory authority, you can do so by contacting the Information Commissioner's Office (ICO). Contact details for the ICO can be found on [this webpage](#).