

Privacy Policy

Policy Statement

Conduit Scotland's **privacy policy** states how as an organisation we will respect the privacy of our customers, funders, partners and staff and any other stakeholders. It states what information we will gather, how we will use the information and how we will keep it secure. Conduit Scotland is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified then you can be assured that it will only be used in accordance with this privacy statement.

This website www.conduitscotland.com and our online application portal <https://conduitscotland.anchor.co.uk/Home> is operated by Five Lamps Trading Limited, a wholly owned subsidiary of Five Lamps charity. Registered in England and Wales. Company Reg. No. 08029251. VAT No. 242 5687 93. Registered Office: Eldon Street, Thornaby, Stockton, TS17 7DJ

What we collect

We may collect the following information:

- Information collected directly from you through your online application, or information you provide when you contact our customer service department, including personal information like your name, email address, telephone number and bank details
- Your telephone and email communications with us and our customer services department which may be monitored and recorded
- Information about your transactions including loan balances
- Information from outside sources such as credit reference agencies and customer service providers regarding credit worthiness and credit history
- Information that is collected when you use the website that may be used by us to identify you and validate your use of the website for fraud prevention purposes
- Information about your computer including, your IP address, operating system and browser type. This is statistical data about browsing actions and patterns and is not in individually identifiable form
- Equality and Diversity information
- Demographic information such as your address
- Other information relevant to customer surveys and/or other feedback
- Automatic information obtained by using "cookies" when your browser accesses our website. If enabled, cookies may store small amounts of data on your computer about your visit to any of the pages of this website. Cookies assist us in tracking which of our features appeal the most to you and what content you may have viewed on past visits. When you visit this site again, cookies can enable us to customise our content according to your preferences. These cookies do not track individual user information, and all our cookie data is encrypted and cannot be read by other websites. It is possible to 'turn off' the cookies in your browser and this will not affect the functionality of the website.

How we use your personal data

The information we collect about you will be recorded electronically and may be used for a number of purposes:

- in the normal course of our business such as verifying your identity and credit standing
- in order to process loan transactions and update your account records
- to assess your credit history and confirm your employment details
- to make lending decisions
- to contact third parties, such as your employer, who you have nominated to verify information about yourself or organisations that can provide you with additional support
- for conducting statistical analysis and to develop and improve our products, to assess lending risks
- to identify you when you contact us or visit our website
- to contact you in connection with your enquiry
- to update our website to better meet our customers' needs in the future
- to ensure that content from our site is presented in the most effective manner for you and for your computer, tablet or mobile device
- to carry out our obligations arising from any contracts entered into between you and us
- to allow you to participate in interactive features of our service, when you choose to do so
- to evaluate the effectiveness of our marketing of the website, to carry out regulatory checks and for market research
- to market our products and services to you. You can opt out of marketing communication by emailing loans@conduit.org.uk or 0300 111 0559
- to notify you about changes to our service. We require this information to understand your needs and provide you with a high quality service.
- We also request it for:
 - Internal record keeping
 - Funders Reports and CRM systems to demonstrate how we are delivering our services
 - Promotion of our activities

How we store and process your data

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/pin code which enables you to access certain parts of our site, you are responsible for keeping this password/pin code confidential. We ask you not to share a password/pin code with anyone. 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.

Our security systems meet or exceed industry standards and we are constantly monitoring internet developments to ensure our systems evolve as required. We also test our systems regularly to make sure our security mechanisms are up to date.

Finally, we are subject to UK data protection laws, which we comply with fully. For the purpose of the Data Protection Act 1998 (the Act), the data controller is Five Lamps Trading Limited, Eldon Street, Thornaby, Stockton-on-Tees, TS17 7DJ. Our registration number is: ZA164810

Disclosure of your information

We will only disclose your information in the event;

- we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use, or terms and conditions and other agreements, or to protect the rights, property, or safety of Conduit Scotland, our customers, or others
- If you give us false or inaccurate information and/or we suspect fraud, we may record this on your credit history and may also pass information to appropriate law enforcement or regulatory authorities and/or to any Fraud Prevention Agency (FPA).

Credit Reference Agencies and Fraud Protection

We may also disclose your personal information to credit reference agencies (CRAs) and Fraud Prevention Agencies (FPAs), along with the details of your agreement, payments made and any default or failure to maintain the terms of the agreement.

When CRAs receive a search from us they will place a search footprint on your credit file that may be seen by other lenders. They supply to us both public (including the electoral register) and shared credit and fraud prevention information. If you give us false or inaccurate information and we suspect or identify fraud we will record this and may also pass this information to FPAs and other organisations involved in crime and fraud prevention. 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:

- Checking details on applications for credit and credit related or other facilities
- Managing credit and credit related accounts or facilities
- Recovering debt
- Checking details on proposals and claims for all types of insurance
- Checking details of job applicants and employees

How we use cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

Overall, cookies help us provide you with a better website by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of our website.

Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

Linking to our site

We welcome linking to the homepage of www.conduitscotland.com but written permission for using our name, logo and linking to conduitscotland.com is required. Linking to any other page is not permitted.

No deep linking or framing to will be permitted without prior agreement. Linking to our site is subject to you doing so in a way that is fair and legal and does not damage our reputation or take advantage of it, and in a way that does not in any way suggest any form of association, approval or endorsement on our part where none exists.

You must not establish a link from any website that is not owned by you.

Reliance on information posted

Any materials on our site are not intended to and, shall not amount to, advice upon which reliance should be placed. Accordingly we disclaim any responsibility and all liability in the event reliance is placed on any material on our site. If you require advice on material referenced on our site, you should seek independent advice.

Age

To register with us you must be 18-years of age or older. Minors are strictly forbidden from using the service. Conduit Scotland will make reasonable precautions against persons under the age of 18 accessing the loan service.

Intellectual property rights

All copyright, database right and/or similar rights in all material presented by on our site (including graphical images, text, video clips, reprographics, sounds, demos, patches and other files) are owned, controlled and/or licensed by us, and are protected by copyright, trade mark and other proprietary rights.

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Our status (and that of any contributors to our site identified as the authors of material on our site) must always be acknowledged.

If you use any part of our site in breach of these terms of use, your right to use our site will cease immediately and you must, at our option, return or destroy any copies of the materials you have made.

Our liability

Our site is provided to you on an "as is" basis and on an "as available" basis. We hereby exclude, to the extent permissible by law, any expressed or implied guarantees, conditions and/or warranties, as to its performance, fitness, completeness, fitness for a particular purpose of the site or its contents, its accuracy or quality.

To the extent permitted by law, we, and third parties connected to us hereby expressly exclude; all conditions, warranties and other terms which might otherwise be implied by statute, common law or the law of equity; (ii) any liability for any direct, indirect or consequential loss or damage incurred by any user in connection with our site or in connection with the use, inability to use, or results of the use of our site, any websites linked to it and any materials posted on it; (iii) any liability for any other loss or damage of any kind, however arising and whether

caused by tort (including negligence), breach of contract or otherwise, even if foreseeable; and (iv) any liability for any loss or damage caused by a virus or similar harmful technology or other material which is malicious or technologically harmful or a denial-of-service attack (each, a "Virus") that may impact or affect your computer equipment, computer programs or data due to your access to or use of (including, without limitation, downloading from) our site.

The above does not affect our liability for death or personal injury arising from our negligence. Further, the above does not exclude our liability for fraudulent misrepresentation or misrepresentation as to a fundamental matter, nor any other liability which cannot be excluded or limited under applicable law.

Contact us

If you have any questions or concerns about the use of your personal information as described above, please contact us at Five Lamps Trading Limited, Eldon Street, Thornaby, Stockton, TS17 7DJ or via email: loans@conduit.org.uk or call our customer service team on 0300 111 0559.

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