



PRIVACY & DATA

CONTACT DETAILS



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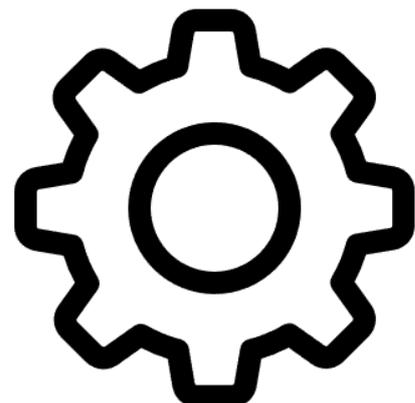
WHO WE ARE

Lime Consultancy is a trading name of Lime Coaching & Consultancy Ltd. Registered in England 07975038, The Beehive, City Place, Gatwick. Lime Consultancy are a commercial credit broker working with a range of lenders, we are not a lender ourselves. We earn our income through a combination of fees paid by the client and/or commission paid by lenders.

Lime Consultancy is Authorised and Regulated by the Financial Conduct Authority.

PRIVACY & DATA NOTICE

The attached forms our privacy notice, it details what data we hold, why we need it and what we do with that data.



INTRODUCTION

Welcome to the Lime Coaching & Consultancy Limited t/a Lime Consultancy's privacy notice.

Lime Consultancy respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

Alternatively you can download a pdf version of the policy here www.limeconsultancy.net/policies . Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

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1. IMPORTANT INFORMATION AND WHO WE ARE

PURPOSE OF THIS PRIVACY NOTICE

This privacy notice aims to give you information on how Lime Consultancy collects and processes your personal data through your use of this website, including any data you may provide through this website when you contact us, sign up to our newsletter, or purchase a product or service. It is our aim to ensure that your personal data is well protected.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you, for example with our Terms of Business, so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

CONTROLLER

Lime Consultancy is the controller and responsible for your personal data as well as a data processor for the purposes of the GDPR (collectively referred to as "we", "us" or "our" in this privacy notice).

Questions, comments and requests about this privacy notice are welcomed, including any requests to exercise *your legal rights*, and should be addressed to the data privacy manager using the details set out below.

CONTACT DETAILS

Our full details are:

Full name of legal entity: Lime Coaching & Consultancy Limited t/a Lime Consultancy

Name or title of data privacy manager: David Farmer

Email address: hello@limeconsultancy.net

Postal address:

The Beehive
City Place
Gatwick
West Sussex
RH6 0PA

Telephone number: 01293 541333

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

This version was last updated on 25th May 2018.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us by emailing us at hello@limeconsultancy.net.

We work hard to keep your personal data secure which includes regularly reviewing it. When there is an important change we will remind you to take a look at the updated privacy policy so you are aware how we use your data and what your options are.

THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. TYPE OF DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified whether directly or indirectly. It does not include data where the identity has

been removed (anonymous data). It includes, for example, name, address, date of birth but also what you do for a living and who you work for and anything else that can be used to identify you as an individual.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, title and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address used to connect your computer to the Internet and information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products 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.
- **Profile Data** includes your purchases or orders made by you, feedback and any survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

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

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, 'phone, email or otherwise. This includes personal data you provide when you:
 - apply for our products or services;
 - subscribe to our service or publications;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey; or
 - give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns using Google Analytics. We collect this personal data by using cookies and other similar technologies. Please see our cookie policy www.limeconsultancy.net/policies for further details.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below :
 - Technical Data from the following parties:

(a) analytics providers such as Google based outside the EU;

(b) search information providers.

- Contact, Financial and Transaction Data from providers of technical, payment and delivery services including credit reference agencies.
- Identity and Contact Data from publicly available sources such as Companies House, the Land Registry and the Electoral Register based inside the EU.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you and to provide you with the information, products and services that you request from us.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Click www.limeconsultancy.net/policies to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by emailing us at hello@limeconsultancy.net.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please email us at hello@limeconsultancy.net if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new client and to manage the Data Subject's relationship with the Broker and process your application for funding.	(a) Identity (b) Contact	Performance of the Company's contract with you, the Data Subject.
<p>To assess, process and deliver Your Instructions and application for funding including:</p> <p>(a) Manage payments, fees and charges, will require bank account details, accounts and personal financial details, from you, the Client, and from other sources such as your Bank and credit reference agencies.</p> <p>(b) Collect and recover money owed to us.</p> <p>(c) The Broker may use and disclose details of this application and any resulting Offer of Funding to you to any Lender, any intended guarantor, any investor and their legal advisors and may further use and disclose information to the Financial</p>	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to recover debts due to us and to prevent the Broker from involvement in fraud – for example, the Client providing deliberately false information whilst trying to raise finance, or ID fraud, raising finance against false invoices etc.</p> <p>(c) Necessary to comply with any legal obligation including the prevention of fraud.</p> <p>Any receipt or transfer of funds will be via recognised secure payment systems. The Broker will securely destroy any financial information once used and no longer needed other than required by law.</p>

<p>Conduct Authority, NACFB, any processing agents with whom the Broker may hold an agreement to process data.</p> <p>The information will be used to assess the application, to approach a number of selected lenders and, subsequently, in negotiations for the issue of an offer of funding with them. In order to do so, we will disclose such of this information as is necessary to negotiate terms with a funding source, with employees of this business, any guarantor required by the lender, any person or organisation necessary to comply with any legal or regulatory requirements to which we may be subject, and anyone else whom you may specifically authorise in writing, and to comply with the NACFB Code of Conduct</p>		
<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) Asking you to leave a review or take a survey</p> <p>(c) To promote the Company on its website and marketing activities, including mail shot and invitations to networking events.</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how clients use our products/services and manage any complaints)</p> <p>(d) Consent. The firm will seek the Data Subject's explicit consent in writing. The Data Subject may withdraw their consent at any time email or letter or similar method used to obtain the Data Subject's consent.</p>
<p>To enable you to partake in a prize draw, competition or complete a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to study how clients use our products/services, to develop them and grow our business)</p>

	(e) Marketing and Communications	
To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how clients use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, client relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of clients for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To protect against fraud by way of call recording of all calls as required by the FCA leading up to transactions.	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Necessary to comply with a legal obligation. (b) Performance of a contract with you.
To make suggestions and recommendations to you about products or services that may be	(a) Identity (b) Contact	Necessary for our legitimate interests (to develop our products/services, manage

of interest to you and to receive feedback on our services	(c) Technical (d) Usage (e) Profile	any complaints and grow our business).
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MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising:

PROMOTIONAL OFFERS FROM US

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and, in each case, you have not opted out of receiving that marketing.

THIRD-PARTY MARKETING

We currently have no intention of sharing data with third parties for marketing purposes however if that changes we will get your express opt-in consent before we share your personal data with any company outside Lime Consultancy for marketing purposes.

OPTING OUT

You can ask us or third parties to stop sending you marketing messages at any time by emailing us at hello@limeconsultancy.net at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see www.limeconsultancy.net/policies.

CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please email us at hello@limeconsultancy.net.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the

legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table above [and with business partners, suppliers and sub-contractors] for the performance of any contract we enter into with them or you and credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.

- External Third Parties as set out in the [Glossary](#).
- Specific third parties such as HMRC.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS

We do not transfer your personal data outside the European Economic Area (**EEA**) to be used by any other party we do however use G-Suite, a US Google cloud based email and storage system and Capsule CRM (stored on Amazon servers outside EU). This will therefore involve transferring your data outside the European Economic Area (**EEA**).

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

Please email us at hello@limeconsultancy.net if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. DATA RETENTION

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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 requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes. This also helps us, for example, in the event that there is a complaint about our Services, to respond to you in full.

Details of retention periods for different aspects of your personal data are available from us by emailing us at hello@limeconsultancy.net.

In some circumstances you can ask us to delete your data: see [Request erasure](#) below for further information.

In other circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- [Request access to your personal data.](#)
- [Request correction of your personal data.](#)
- [Request erasure of your personal data.](#)
- [Object to processing of your personal data.](#)
- [Request restriction of processing your personal data.](#)
- [Request transfer of your personal data.](#)
- [Right to withdraw consent.](#)

If you wish to exercise any of the rights set out above, please email us at hello@limeconsultancy.net

with specific details of who to contact for subject access rights.

NO FEE USUALLY REQUIRED

Data Subjects have the right to access their personal data and supplementary information. The right of access allows individuals to be aware of and verify the lawfulness of the processing.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive or requires copies of previously provided information. Alternatively, we may refuse to comply with your request in these circumstances.

In the event of manifestly unfair or excessive requests we may refuse to respond to the request and any such refusal will be notified to the requester (Data Subject) with a reason for the refusal and, in addition, information as to the Data Subject's rights to complain to the ICO or judicial authority within one month of such a request being received.

WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. GLOSSARY

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by emailing us at hello@limeconsultancy.net.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

EXTERNAL THIRD PARTIES

- Service providers acting as processors based in the UK who provide IT and system administration services.
- Professional advisers acting as processors including lawyers, bankers, auditors and insurers based in the UK who provide HR consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Lenders, fraud prevention agencies, credit reference agencies, the FCA and NACFB.
- Sendinblue (Email marketing, in EU), and Signable (electronic acceptance of documents, in EU).

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request 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 continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.