



2020-8-10

Data Protection Policy – www.lilyheadfinance.co.uk

Lily Head Finance takes its responsibilities about the management of the requirements of the General Data Protection Regulation (GDPR) very seriously. This policy sets out how we manage those responsibilities.

Lily Head Finance obtains, uses, stores and otherwise processes personal data relating to potential and actual clients.

When processing personal data, we are obliged to fulfil individuals' reasonable expectations of privacy by complying with GDPR and other relevant data protection legislation (data protection law).

This policy therefore seeks to ensure that we:

1. Are clear about how personal data must be processed.
2. Comply with the data protection law and with good practice.
3. Protect the reputation of Lily Head Finance by ensuring the personal data entrusted to us is processed in accordance with data subjects' rights.
4. Protect Lily Head Finance from risks of personal data breaches and other breaches of data protection law.

Personal data protection principles

When you process personal data, you should be guided by the following principles, which are set out in the GDPR. Lily Head Finance is responsible for, and must be able to demonstrate compliance with, the data protection principles listed below:

Those principles require personal data to be:

1. Processed lawfully, fairly and in a transparent manner (Lawfulness, fairness and transparency).
2. Collected only for specified, explicit and legitimate purposes and not further processed in a manner incompatible with those purposes (Purpose limitation).
3. Adequate, relevant and limited to what is necessary in relation to the purposes for which it is Processed (Data minimisation).
4. Accurate and where necessary kept up to date (Accuracy).
5. Not kept in a form which permits identification of data subjects for longer than is necessary for the purposes for which the personal data is processed (Storage limitation).
6. Processed in a manner that ensures its security, using appropriate technical and organisational measures to protect against unauthorised or unlawful processing and against accidental loss, destruction or damage (Security, integrity and confidentiality).



Your Rights as the 'Data Subject'.

1. **The data subject's right of access.** You have the right to know whether data concerning you is being processed and if so, to have access to it.
2. **The data subject's right to rectification.** When personal data is inaccurate, then you can expect us to promptly correct it.
3. **The data subject's right to be forgotten.** Please message us on funding@lilyheadfinance.co.uk if you would like to be forgotten.
4. **The data subject's right to restriction of processing.** This is the right to limit the scope of the processing of your data.
5. **The data subject's right to data portability.** You have the right to transfer personal data from one electronic processing system to and into another electronic processing system.
6. **The data subject's right to object.** You have the right to decline to have your personal data processed.

Our legal basis for collecting personal data is as a 'Legitimate Interest'.

We have considered the following three criteria and completed a Legitimate Interests Assessment (LIA).

1. **Purpose test:** We are pursuing legitimate interests
2. **Necessity test:** The processing is necessary for that purpose
3. **Balancing test:** The individual's interests do not override the legitimate interests
 - We process personal data to match up prospective purchasers of dental practices with our bank lending panel and dentists who want to sell their dental practice(s). The processing of their data is of mutual benefit
 - We process personal data to understand which clients require business funding in order to purchase a dental practice
 - The processing of personal data enables us to efficiently and accurately search and match thousands of records
 - We would be unable to manually review thousands of records to find the one person or company who is able to help our clients
 - We do not hold any sensitive personal information
 - We do not process data for anyone who we believe is under 18 years of age.
 - We do not process data which is particularly private
 - We do process data that refers to people in their professional capacity. This is to help with accurately sharing industry information

Personal identification information

We collect personal identification information from Users in a variety of ways, including, but not limited to, when Users visit our site, register on the site, subscribe to the newsletter, fill out a form, and in connection with other activities, services, features or resources we make available on our Site. Users may be asked for, as appropriate, name, email address, postal address, phone number, GDC number and an indication if they wish to purchase a dental practice of secure asset funding.

Lily Head Finance Limited t/a Lily Head Finance – Reg. in England & Wales – Co. No. 12394352

Reg. Office: c/o Ollis & Co, 2 Hamilton Terrace, Leamington Spa, Warwickshire CV32 4LY

Authorised & Regulated by the Financial Conduct Authority. FRN: 923905

Lily Head Finance is a Credit Broker and not a Principal Lender. VAT No: 353405909

Lily Head Finance is a member of the NACFB (National Association of Commercial Finance Brokers)



We also ask for your position or status (if the application is made on behalf of an incorporated business), your business name, your day-time contact telephone number and a private phone number.

We may also collect personal information on you from places such as business directories and other commercially or publicly available sources e.g. to check or improve the information we hold (like your address), or to give better contact information if we are unable to contact you directly.

Users may, however, visit our site anonymously. We will collect personal identification information from Users only if they voluntarily submit such information to us. Users can always refuse to supply personally identification information, except that it may prevent them from engaging in certain Site related activities.

Technical information

We may collect technical information about Users whenever they interact with our Site. This may include the browser name, the type of computer and technical information about Users means of connection to our Site, such as the operating system and the Internet service providers utilised and other similar information.

Web browser cookies

Our Site may use “cookies” to enhance User experience. User’s web browser places cookies on their hard drive for record-keeping purposes and sometimes to track information about them. Users may choose to set their web browser to refuse cookies, or to alert you when cookies are being sent. If they do so, note that some parts of the Site may not function properly.

Please review our cookie policy here: <https://www.lilyheadfinance.co.uk/privacy-centre/cookie-policy/>



How we use collected information

- To improve customer service:
 - Information you provide helps us respond to your customer service requests and support needs more efficiently.
- To personalize user experience:
 - We may use information in the aggregate to understand how our Users as a group use the services and resources provided on our Site.
- To improve our site:
- We may use feedback you provide to improve our products and services.
- To run a promotion, contest, survey or other Site feature
- To send Users information they agreed to receive about topics we think will be of interest to them.
- To send periodic emails
- We may use the email address to respond to their inquiries, questions, and/or other requests.
- If User decides to opt-in to our mailing list, they will receive emails that may include company news, updates, related product or service information, etc.
- If at any time the User would like to unsubscribe from receiving future emails, we include detailed unsubscribe instructions at the bottom of each email or User may contact us via our Site.

How we protect your information

We adopt appropriate data collection, storage and processing practices and security measures to protect against unauthorized access, alteration, disclosure or destruction of your personal information, username, password, transaction information and data stored on our Site.

Sensitive and private data exchange between the Site and its Users happens over an SSL secured communication channel and is encrypted and protected with digital signatures.

Sharing your personal information

We do not sell, trade, or rent Users personal identification information to others. We may provide generic aggregated demographic information not linked to any personal identification information regarding visitors and users with our business partners, trusted affiliates and advertisers.

If you have agreed or are in negotiation on the financing of the purchase of a dental practice through Lily Head Finance we will share your personal information with our client and their legal team in order to facilitate a transaction. It will extend to your name, e mail address, GDC number (if applicable) and your private phone number.

Third party websites

Users may find advertising or other content on our Site that link to the sites and services of our partners, suppliers, advertisers, sponsors, licensors and other third parties. We do not control the content or links that appear on these sites and are not responsible for the practices employed by websites linked to or from our Site. In addition, these sites or services, including their content and links, may be constantly changing. These sites and services may have their own privacy policies and

Lily Head Finance Limited t/a Lily Head Finance – Reg. in England & Wales – Co. No. 12394352

Reg. Office: c/o Ollis & Co, 2 Hamilton Terrace, Leamington Spa, Warwickshire CV32 4LY

Authorised & Regulated by the Financial Conduct Authority. FRN: 923905

Lily Head Finance is a Credit Broker and not a Principal Lender. VAT No: 353405909

Lily Head Finance is a member of the NACFB (National Association of Commercial Finance Brokers)



customer service policies. Browsing and interaction on any other website, including websites which have a link to our Site, is subject to that website's own terms and policies.

Data Retention Policy

We will keep your personal information only where it is necessary to provide you with our products or services while you are a customer.

We may also keep your information after this period but only where required to meet our legal or regulatory obligations. The length of time we keep your information for these purposes will vary depending on the obligations we need to meet

Changes to this privacy policy

Lily Head Finance has the discretion to update this privacy policy at any time. When we do, we will revise the updated date at the bottom of this page. We encourage Users to frequently check this page for any changes to stay informed about how we are helping to protect the personal information we collect. You acknowledge and agree that it is your responsibility to review this privacy policy periodically and become aware of modifications.

Your acceptance of these terms

By using this Site, you signify your acceptance of this policy. If you do not agree to this policy, please do not use our Site. Your continued use of the Site following the posting of changes to this policy will be deemed your acceptance of those changes.

Data Privacy Manager

James Head (Director) is our appointed Data Privacy Manager.

If you have any questions about this Privacy Policy then please contact him on funding@lilyheadfinance.co.uk or use the details below.

Lily Head Finance Ltd
Bull Market
Bull Ring Business Centre
Church Terrace
Harbury
CV33 9HL

Tel: 0333 772 9078

funding@lilyheadfinance.co.uk

Contact the Information Commissioners Office (ico.)

If you wish to complain to the ico please use this link: <https://ico.org.uk/make-a-complaint/>

Lily Head Finance Limited t/a Lily Head Finance – Reg. in England & Wales – Co. No. 12394352
Reg. Office: c/o Ollis & Co, 2 Hamilton Terrace, Leamington Spa, Warwickshire CV32 4LY
Authorised & Regulated by the Financial Conduct Authority. FRN: 923905
Lily Head Finance is a Credit Broker and not a Principal Lender. VAT No: 353405909
Lily Head Finance is a member of the NACFB (National Association of Commercial Finance Brokers)