



PRIVACY POLICY

Blacksmiths Technology Ltd (trading as Finch) is committed to protecting your personal data. Blacksmiths Technology Ltd's (trading as Finch) registered office address is Blacksmiths Technology Ltd, Pure Offices, Lake View Drive, Sherwood Business Park, Nottingham, NG15 0DT. The company registered number is 12014186 and ICO registration is ZB009051. The details you provide will only be used by Blacksmiths Technology Ltd (Data Controller). We will never swap, share or sell your details without your consent. We protect any personal data that you share with us, or that we get from other organisations and we keep it safe. We always aim to be clear with you about how we will use your data and we promise not to do anything with it that you would not reasonably expect. We collect, use and are responsible for certain personal information about you. When we do so, we are subject to current Data Protection Legislation, specifically The Data Protection Act 2018 (DPA 2018) and are responsible as "controller" of that information for the purposes.

WHAT IS THE DEFINITION OF PERSONAL DATA?

Personal data is any information that can be used to identify you. It can include information such as your name, gender, date of birth, personal or professional interests, e-mail address, postal address, telephone numbers or bank details. The type and quantity of information we collect and how we use it depends on why you are providing it. We promise that we will only gather information from you that is adequate and relevant to be used for an explicit and specific purpose.

WHERE DO WE OBTAIN PERSONAL DATA FROM?

When you give it to us directly

We collect personal data about you when you register with us as customer, use the Finch app, sign up for news/marketing materials from us, or when you choose to communicate with us electronically, such as by email or phone. We will collect this information in person, over the telephone, by post, by email or via our websites.

When you give it to us indirectly

We also collect information about you from publicly available sources. We may combine this information with personal data provided by you. This helps us update, expand, and analyse our records, identify new customers, and create more tailored advertising to provide services that may be of interest to you. We also use this for the purposes of targeted advertising, delivering relevant email content, event promotion and profiling, determining eligibility and verifying contact information.

Social Media

We will only contact you through social media sites such as Facebook, Linked In, Instagram or Twitter if your privacy settings give us access to your contact details.

Third Parties

We may also collect information directly from a third party such as a credit reference agency or customer due diligence provider or directly from a third party with your consent such as a bank or building society.

Website

We may collect cookies on our website. Please see our [cookie policy](#).

HOW DO WE USE YOUR PERSONAL DATA?

We use your personal data in a number of ways depending on your instructions and contact preferences. These may include but not limited to, the following:

1. Telephone contact to inform you about changes to Finch.
2. Telephone contact to inform you about changes to products or in relation to a commercial relationship.
3. Email contact to inform you about changes to Finch.
4. Email contact to inform you about changes to products or in relation to a commercial relationship.
5. Postal contact to inform you about changes to Finch.
6. Postal contact to inform you about changes to products or in relation to a commercial relationship.
7. We use your information for internal administrative purposes (such as our accounting and records, and to let you know about changes to our services or policies.
8. We may use your personal information to look into, and respond to, complaints, legal claims or other issues.
9. We will use your bank account details to process payments, contractual fees and costs associated with our services.



WHERE YOUR PERSONAL INFORMATION IS STORED AND HOW LONG WE KEEP IT.

Information is stored in data centres managed in the UK and United States.

We will retain your personal data for the period necessary to fulfil the purposes outlined in this Policy and as otherwise needed to comply with applicable law and internal company policies.

YOUR STATUTORY RIGHTS

You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your personal information (the right of access).
Rectification	The right to require us to correct any mistakes in your personal information.
To be forgotten	The right to require us to delete your personal information – in certain situations.
Restriction of processing	The right to require us to restrict processing of your personal information – in certain circumstances, eg if you contest the accuracy of the data.
Data portability	The right to receive the personal information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party – in certain circumstances.
To object	The right to object: <ul style="list-style-type: none">• at any time to your personal information being processed for direct marketing (including profiling)• in certain other situations to our continued processing of your personal information, eg processing carried out for the purpose of our legitimate interests.
Not to be subject to automated individual decision-making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you.

For further information on each of those rights, including the circumstances in which they apply, please contact us or see the Guidance from the UK Informational Commissioner's Office (ICO) on individuals' rights under the General Data Protection Regulation.

SUBJECT ACCESS REQUEST

If you wish to make a request for access to a copy of your personal data, then please notify us by email, by phone or by post. We will endeavour to respond to and comply with your request as quickly as possible. We are aware of the statutory deadline for a subject access request, however we will always try to send your information before the legal deadline.

HOW CAN YOU ASK US TO STOP USING YOUR PERSONAL DATA?

You have the right to withdraw consent for us to contact you at any time by the following methods:

By email: support@finch-app.com

By phone: +44 (0) 20 8142 5212

By post: **Blacksmiths Technology Ltd, Pure Offices,
Lake View Drive, Sherwood Business Park,
Nottingham, NG15 0DT**

We will endeavour to make sure that your preferences are updated as soon as possible and within a maximum 3 working days. Withdrawing this consent may limit the services you receive from us and our ability to communicate effectively with you. Your rights will not be affected.



HOW CAN YOU UPDATE OR CORRECT THE PERSONAL DATA THAT WE HAVE HOLD ON YOU?

You can contact us at any time to update the personal details that we have on our database - in fact, that would be a great help to us.

Again, contact us on one of the following methods:

By email: support@finch-app.com

By phone: +44 (0) 20 8142 5212

By post: **Blacksmiths Technology Ltd, Pure Offices,
Lake View Drive, Sherwood Business Park,
Nottingham, NG15 0DT**

We will endeavour to make sure that your preferences are updated as soon as possible and within a maximum of 3 working days.

YOUR RIGHT TO ACCESS THE DATA WE HOLD ON YOU

You will always have control over your personal data. You have the right to request information about the data we hold on you at any time for free. We promise to provide access to that data, free of charge and within 1 month of your request. You have the right to correct your data and update your preferences at any time. You have the right to have your data erased at any time.

You have a right to ask us to stop processing your personal data at any time.

If at any time you wish to withdraw your consent and tell us not to contact you then please contact a member of the Data Compliance team:

By email: support@finch-app.com

By phone: +44 (0) 20 8142 5212

By post: **Blacksmiths Technology Ltd, Pure Offices,
Lake View Drive, Sherwood Business Park,
Nottingham, NG15 0DT**

HOW CAN YOU LODGE A COMPLAINT ABOUT THE WAY IN WHICH THE WE HAVE USED YOUR DATA?

If you have contacted us and you are unhappy with the way in which we have dealt with your query regarding the use of your data then it is within your rights to lodge a complaint with a supervisory authority.

The ICO (Information Commissioner's Office) is the UK's independent authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals.

You can find out more information or report a concern through the ICO website:

www.ico.org.uk/concerns/handling/

HOW WILL I KNOW IF YOU MAKE CHANGES TO THIS PRIVACY POLICY?

The date in the footer of this document indicates when this document was last updated. When we make changes to this privacy policy we will make an announcement in the News section of our website.