# Fair Processing Notice.

Version 5.1 (August 2026)

Together Financial Services Limited

Customer and applicant fair processing notice: Your personal data and what we do with it.

## 1. Introduction

You may have provided, or authorised a third party to provide, your personal data to us. This notice applies to customers and applicants of: Together Commercial Finance Limited (Company Number: 02058813) and Together Personal Finance Limited (FCA Reference: 305253, Company Number: 02613335) trading as Together ("**Together**").

The information within this fair processing notice tells you how we will use the personal data provided to us as a "controller" under data protection laws.

Together is part of a larger corporate group ("**Group**") that includes a number of other companies who are under common control with Together (referred to as "we" "us"). Currently, the members of this Group include (but are not limited to) Together Commercial Financial Limited, Together Personal Finance Limited, and Together Financial Services Limited. You should check our website (www.togethermoney.com) from time to time in case of any changes to our Group.

We will collect your personal data where either you or a company, person or other entity with whom you are associated or are acting as a guarantor for is applying to enter into a loan agreement (the "Agreement") with us. This fair processing notice sets out how we will use that data in considering the application and subsequently administering any loan.

This fair processing notice may be updated from time to time. We will notify you of any material changes either via a banner on our website, by email or by post.

## 2. What is personal data?

Personal data means information that relates to an identified or identifiable living individual ("identifiable" refers to being able to identify the living individual when the information held is combined with other information).

## 3. What types of personal data might we hold about you?

We will collect and use personal data about you that is provided to us throughout the duration of your application and any resulting loan. For example, by filling in any forms or applications relevant to your loan, or by communicating with us by phone, e-mail, post, via our webpage or via our mobile applications, customer portals, broker portals, secure document upload facilities and other digital services that we make available from time to time. We may also collect and use personal data about you that we obtain from third parties such as brokers, intermediaries or from agencies (as set out in Section 7 below).

We may hold any or all of the following personal data about you:

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- Personal details such as your name, title, gender, age, date of birth, contact details (e.g. your address and previous addresses, email, telephone and mobile numbers).
- Details contained within your passport, or any other identification provided to us as part of the loan application.
- Records of how you have contacted us and, if you visit our webpage, technical information (including IP address, device details and your login information) and information about each visit you make to the website (such as page response times and length of visit). Please refer to our online Website Privacy and Cookies Policy for further details.
- Details of your family, lifestyle and social circumstances. This could include details about your current marriage or civil partnership, any previous relationships and details of your family and dependents.
- Employment details such as your earnings, length of service, employment and career history, job title and retirement status.
- Your financial details such as income, salary, savings, expenditure, existing loans / borrowings, assets, investments, bank account details, financial status, tax position, existing or previous bankruptcies, CCJs or other insolvency arrangements and whether you are receiving benefits.
- Occupier status, residency or citizen status and/or nationality.
- Special category personal data such as racial or ethnic origin, a description of or information regarding your physical or mental health.
- Photographs, video recordings and other visual media where you participate in case studies, testimonials, events, public relations activities or other corporate communications.
- Any information that you choose to provide us with in connection with your loan. We will only store this information to the extent it is necessary to manage your loan or any complaint.

If you are applying for a loan on behalf of a company or other entity, or if you have a guarantor, then we may also hold and process the personal data of any company director(s) or, where applicable, the guarantor(s).

## 4. How long do we hold your personal data for?

We will hold your personal data on our systems for:

- as long as is necessary for the processing of your application and where your application is not accepted or you decide not to take out a loan with us, for a further 12 months

  or
- where you take out a loan with us, for the duration of your loan and an additional 6 years after your loan has concluded.

We will never retain your personal information for longer than is necessary. However, we may keep your data longer than 6 years if we cannot delete it for legal or regulatory reasons.

We may anonymise your information at the end of the retention period. This means that we will remove all information that allows us to identify you individually. We use this type of information to help us understand our business better and improve our products and services.

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## 5. Using your information in accordance with data protection laws

Data protection laws require that we meet certain legal grounds and that we explain to you the reasons why we have met those legal grounds before we are allowed to use your personal data as set out in this fair processing notice. Here are the legal grounds that are relevant to us:

a) **Contract:** We must process your personal information to be able to provide you with your loan in accordance with its terms and to process any application for a loan. Without your information we cannot provide you with a loan.

b) **Legitimate interests:** The processing is necessary for us to conduct our business, but not where our interests are overridden by your interests or rights.

c) **Consent:** You have told us you are happy for us to process your personal information for a specific purpose(s). We only rely on consent in limited, specific circumstances (for example, if you advise us of a health condition, we will seek your consent to record and process this information).

d) **Legal obligation:** We are required to process your personal information by law. Where there is a legal requirement upon us to record, retain or share your personal data with authorities, we must do so. For example, to comply with laws and regulations which govern our business, such as the Financial Services and Markets Act 2000 and the Proceeds of Crime Act 2002.

e) **Substantial public interest:** Where you have a health issue and are unable to provide consent to us, we may record special category data where it is necessary for reasons of safeguarding your economic wellbeing.

f) **Vital interests:** The processing of your personal information is necessary to protect you or someone else's life.

## 6. What we do with your personal data

We will use your information to consider your application for a loan with us and where your application is successful, for the subsequent administration and management of your loan. We may also use your information to improve the operation of our businesses and enhance our product offering. For example, we may use your personal data to:

- confirm your identity and other application details, such as your address and income
- prevent and detect crime, including fraud and money laundering
- comply with legal and regulatory obligations
- contact you about products/services
- decide whether or not to give you a loan and the terms and conditions of your loan (please see section 7f below)
- carry out financial (including credit), income and insurance risk assessments and for risk reporting and risk management

- calculate your payments
- respond to requests from you enforcing your rights under data protection laws (an explanation of these rights is set out at section 10) that you may submit to us directly or via a third party
- recover debts
- understand if you have further financing requirements
- deal with queries relating to your loan
- communicate with you or third parties (see sections 7 and 8 below) about your loan
- improve our loan product and customer service experience
- improve our understanding of our customer base
- understand how customers interact with our website and marketing activities, helping us improve customer journeys and understand which activities lead to customer enquiries and applications
- conduct staff training and quality assurance checks
- improve our processes in an internal and secure testing environment, to improve our systems and test new products
- produce and distribute marketing materials, corporate communications, public relations content, case studies, testimonials and event-related communications
- provide you with relevant marketing communications (including but not limited to by email, phone, or post), relating to other products and services, and those of the Together Group.

## 7. How we use your personal data

As well as you providing us with personal data when you apply for and throughout the duration of your loan, in processing your application and managing your loan, we will also search your records at credit reference and fraud prevention agencies ("Agencies") and share information with Agencies as set out below.

The identities of the Agencies, their role also as fraud prevention agencies, the data they hold, the ways in which they use and share personal data, data retention periods, and your data protection rights with the Agencies, are explained in more detail in the Credit Reference Agency Information Notice. You can find out more about how these Credit Reference Agencies collect, use and share personal information they hold about you, and what your rights are in relation to that information on the following websites:

www.equifax.co.uk/crain
www.experian.co.uk/crain
www.transunion.co.uk/crain

Further, we may process your personal data with the credit reference agencies to ensure our systems operate as required, to improve our processes, and to test new products. Your data will only be used internally and will be managed securely. In this scenario, your credit rating will not be impacted, nor will this result in a footprint on your credit reference report.

### a. Receiving information from Agencies

The Agencies may supply us with your personal data including credit information, such as previous applications, identity checks, income checks, credit checks, the conduct of accounts in your and your financial associate's name, any business accounts you have, fraud prevention information and

public information such as County Court Judgments, bankruptcies and the Electoral Register. We may receive this information via a search we make whilst we are considering your application (an '**Application Search**') and on an ongoing basis during your loan. A record of our Application Search will be made by the Agencies and seen by other lenders on any future searches made. If you are a director or partner in a small business, we may also carry out a check on your business and in doing so we may obtain your personal data from Agencies.

**b. Receiving "associated records" from Agencies**

Before entering into any agreement with you we may search your records at an Agency, which may be linked to records relating to your spouse or partner, or other persons with whom you have, or have had a joint finance
agreement, or made a credit application ("**Associate**"). For the purpose of approving or rejecting this application you and any Associates may be treated as financially linked and your application will be assessed with reference to Associates' records.

**c. Sharing information with Agencies**

We will add to your records with the Agencies details of any agreement with us, your loan, the payments you make under it and any arrears, default or failure to make payments and any change of name or address. In doing so, we will provide the Agencies with your personal data, including your account information. Account information given to Agencies remains on file for 6 years after the account is closed, whether settled by you or upon default.

These records will be shared by the Agencies with other organisations (such as lenders and fraud prevention agencies), who may access your information from other countries and may be used and searched by us and them to:

i. consider applications for credit and credit related services, such as insurance, for you and any Associates (please see above) or members of your household
ii. trace debtors, recover debts, prevent or detect money laundering and fraud, to manage your account(s).

If you are a director or partner in a small business, we may also complete a check on your business and in doing so supply your personal data to Agencies.

**d. Sharing information with Agencies in respect of Joint Applications**

Where you are applying for a loan jointly with (an) other applicant(s), by making this application jointly (whether or not this joint application proceeds) Agencies may create an association between you and the other applicant(s), which will link your financial records and the Agency may treat you as Associates. Your Associate's information held by Agencies may be taken into account when a future search is made by us or another company, until you tell the Agencies that you are no longer financially linked, and the Agencies accept this.

**e. Law enforcement and fraud protection**

It is important that you provide your broker or intermediary and us with accurate information. Before your broker or intermediary submits an application to us, it is important that you satisfy yourself that they have captured your information accurately and it matches the information you provided them.

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The personal data we have collected from you will be shared with fraud prevention agencies ("FPAs") who will use it to prevent fraud and money laundering and to verify your identity. If fraud is detected, you could be refused certain services, finance, or employment. Further details of how your information will be used by us and these FPAs, and your data protection rights, can be downloaded from www.cifas.org.uk/fpn or obtained from Group Risk, Together Financial Services Limited, Lake View, Lakeside, Cheadle, SK8 3GW.

**f. Automated decision-making**

Automated decision-making means that software analyses the information that has been provided and returns a decision without human intervention. We may use automated decision making to carry out the following activities:

- To determine your financial situation and to make decisions about whether to accept your loan application, the products that you are eligible for and the terms and conditions of your loan (including the price).
- For account management purposes (e.g. to manage arrears or to contact you).
- To efficiently manage our portfolio of lending.
- To obtain and collate information from Agencies (in the manner set out in section 7a above).
- To send you alerts and communications about your loan that may be appropriate for you and your circumstances.

Application decisions may be taken based on solely automated checks of information from Agencies and our records. However, you do have the right to ask us to look at this manually. If you think we may have missed some relevant information during the decision-making process and would like this to be taken into account, please contact us.

**g. Processing involving artificial intelligence (AI)**

We may use artificial intelligence (AI) technologies, such as machine learning algorithms and automated tools, to support some of our activities. These technologies help us to analyse information, detect patterns, improve our services, and make certain processes more efficient. AI may be used as a standalone tool or be embedded within other systems, including tools that generate human-like text, assist with interpreting information, or support us in responding to queries in a conversational way.

In some circumstances, the use of AI technologies may contribute to automated decision-making. This may include assessing your application, managing your account or assisting us in detecting potential fraud. Where this happens, we apply appropriate safeguards to protect your rights and freedoms. These safeguards may include human review, routine accuracy checks, and governance processes to ensure technology is used appropriately.

Where we use third-party providers to deliver AI-assisted services, we ensure they are contractually required to process your personal data securely and in compliance with data protection laws.

If we introduce new AI technologies, begin using AI in a materially different way, or make significant changes to how AI interacts with personal data, we will update this notice.

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## 8. How we share your personal data

As well as passing information within the Group, we may pass your personal data to other third parties. We will not pass your personal data to any third party except where:

- you have been introduced to us through them, such as a broker or intermediary
- they are our professional advisors such as valuers, accountants, surveyors, solicitors, Law of Property Act (LPA) Receivers, debt collection agencies or other third parties assisting with any recovery action (such as utility companies)
- we share data with third party companies to understand and analyse the profile of our customer base to improve our communications to our customers
- it is required for the purposes of assessing or dealing with your loan application or any subsequent queries relating to your loan and/or enforcement action
- we are required by law and/or by law enforcement agencies, government entities, tax authorities or regulatory bodies
- to third party suppliers acting on our behalf, such as, but not limited to; companies that provide cloud hosting services, mobile application providers, to conduct surveys or research about your experience of our products, and services that print out and distribute customer communications on our behalf
- to credit reference and fraud prevention agencies.
- we are required to for a sale, reorganisation, transfer or other transaction relating to our business
- we are responding to or assisting in the response to your submission of a Data Subject Request to us or a third party
- we provide data to companies that provide data hosting and website management services
- in anonymised form as part of statistics or other aggregated data shared with third parties for the purposes of analysing and managing our loan portfolio, managing the associated risks and developing risk management tools.

We will only share your information with third parties in limited circumstances, where we have a lawful basis to do so and, where appropriate, following due diligence in accordance with our internal procedures.

## 9. Transferring information overseas

In providing your loan, we may be required to transfer your personal data to third parties and organisations who hold data outside of the United Kingdom ("**UK**") or European Economic Area ("**EEA**"). For example, some third party suppliers may have back up or disaster recovery data centers that are located in multiple jurisdictions outside the UK or EEA. This may mean that in certain limited circumstances personal data is transferred to countries which do not inherently provide the same level of protection for personal data as the UK or EEA.

Where your personal data is being transferred outside the UK or EEA, we will ensure that appropriate safeguards are in place, such as the use of International Data Transfer Agreements ("**IDTA**") or, where appropriate, standard contract clauses, to protect your information in accordance with data protection laws. We will also ensure that the appropriate transfer risk assessment is completed.

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## 10. Your rights

You have a number of rights under data protection laws in relation to the way we process your personal data. These are set out below. You may contact us using the details below to exercise any of these rights and we will respond to any request received from you within one month from the date of the request. The information will usually be provided free of charge, although in certain circumstances, we may request that you pay a small fee.

You have the right to request human intervention in decisions made using AI-assisted or fully automated processing, to express your point of view, and to contest the decision.

You have a number of rights under the data protection laws, which are set out in the table below.

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| **The right to be informed** | As a data controller, we are obliged to provide clear and transparent information about our data processing activities. This is provided by this Fair Processing Notice and in any related communications we may send you. |
| **The right of access** | You may request a copy of the personal data we hold about you free of charge. Once we have verified your identity, we will provide access to the personal data we hold about you. If there are exceptional circumstances that mean we might have to refuse to provide the information, we will explain them. If requests are frivolous or vexatious, we reserve the right to refuse them. If answering requests is likely to require additional time or unreasonable expense (which you may have to meet), we will inform you. |
| **The right to rectification** | When you believe we hold inaccurate or incomplete personal information about you, you may exercise your right to correct or complete this data. This may be used with the right to restrict processing to make sure that incorrect/incomplete information is not processed until it is corrected. |
| **The right to erasure** (the 'right to be forgotten') | Where no overriding legal basis or legitimate reason continues to exist for processing personal data, you may request that we delete the personal data. We will take all reasonable steps to ensure erasure. |
| **The right to restrict processing** | You may ask us to stop processing your personal data. We will still hold the data but will not process it any further. This right is an alternative to the right to the right to erasure. If one of the conditions applies you may exercise the right to restrict processing:<br>a) The accuracy of the personal data is contested<br>b) Processing of the personal data is unlawful<br>c) We no longer need the personal data for processing but the personal data is required for part of a legal process<br>d) The right to object has been exercised and processing is restricted pending a decision on the status of the processing |
| **The right to object** | You have the right to object to our processing of your data where:<br>a) Processing is based on legitimate interest<br>b) Processing is for the purpose of direct marketing<br>c) Processing involves automated decision-making and profiling |
| **Right regarding automated decision making and profiling** | You have the right not to be subject to a decision based solely on automated processing, including profiling, which has legal effects for you or affects you in any other significant way. This includes the right to request human intervention in decisions made using AI-assisted or fully automated processing, to express your point of view, and to contest the decision. |

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## 11. Any complaints?

If you are not happy with the way in which your personal data is held or processed by us, or if you are not satisfied with our handling of any request by you in relation to your rights or any automated profiling that we carry out, our Group Data Protection Officer would be happy to help. You can contact our Data Protection Officer at Lake View, Lakeside, Cheadle SK8 3GW or email dpo@togethermoney.com.

Alternatively, you have the right to complain to the Information Commissioner's Office (ICO) by calling 0303 123 1113. The ICO is the UK's independent body set up to uphold information rights. You can find out more about the ICO on its website (https://ico.org.uk).

If you would like to exercise the rights listed above, you can send a request:

- **By post:** Customer Services, Lake View, Lakeside, Cheadle, Cheshire, SK8 3GW - enclosing details of your account number(s) or application date.
- **By e-mail:** datarightsteam@togethermoney.com
- **By telephone:** 0161 333 7403