Privacy Policy

March 2026

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CLAUSE

Introduction

This is the ThinCats Group privacy policy. The terms “privacy policy” and “privacy notice” are used interchangeably.

The ThinCats Group respects your privacy and is committed to protecting your personal data. This privacy notice explains how we look after your personal data, tells you about your privacy rights and how the law protects you.

“You/your” means:

- An individual associated with a “Lender” - an individual who is a director, company secretary, partner, member, shareholder, beneficial owner, trustee or other controlling official or an employee or contractor within a firm, partnership, company or other entity that has mandated a member of the ThinCats Group to act on its behalf in relation to lending activities.
- An individual associated with a “Borrower” - an individual who is a director, company secretary, partner, member, shareholder, beneficial owner, trustee or other controlling official or an employee or contractor within a business that is or has made an application to borrow monies through facilities arranged by a member of the ThinCats Group.
- An individual associated with a “Third Party” - any individual other than an individual associated with a Lender or with a Borrower who has provided personal data to us in connection with a or in connection with a business relationship between a member of the Thincats Group and another business.
- An individual who visits any website operated by the Thincats Group.

Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

1. Important information and who we are

Purpose of this privacy notice

This privacy notice explains how ThinCats Group collects and processes your personal data.

Any website operated by the Thincats Group (“a TC 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 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

The ThinCats Group is made up of different legal entities, details of which can be found in the Glossary to this Policy. This privacy notice is issued on behalf of the ThinCats Group so when we mention The ThinCats Group "we", "us" or "our" in this privacy notice, we are referring to the relevant company in the ThinCats Group responsible for processing your data. Thincats is the controller and responsible for any TC Website.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise *your legal rights*, please contact the DPO using the details set out below.

Contact details

Our full details are:

Full name of legal entity: Thincats Limited

Email address: dataprotectionoffice@shawbrook.co.uk

Postal address: Lutea House, Warley Hill Business Park, The Drive, Great Warley, Brentwood, Essex, CM13 3BE

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator 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 in March 2026.

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.

Third-party links

Any TC 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 a TC Website, we encourage you to read the privacy notice of every website you visit.

2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

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

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, gender, passport details, nationality, photographs and images, signatures and electoral roll data.

- **Contact Data** includes home address, historical address information, email address and telephone numbers.

- **Directorship information** includes directorship role of business.

- **Shareholding Information** includes beneficial ownership of business.

- **Credit Information** includes credit history, credit and risk scoring.

- **Risk and/or Fraud Information** includes information held by fraud prevention and risk management agencies which may include information about your identity, activities, credit information, allegations or criminal convictions.

- **Financial Data** includes bank account and payment details together with details of your financial position, status and history.

- **Transaction Data** includes details about payments to and from any account (including but not limited to bank accounts, savings accounts and trading accounts).

- **Technical Data** includes internet protocol (IP) address, cookies, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access any TC Website.

- **Profile Data** includes your username and password, feedback and survey responses.

- **Usage Data** includes information about how you use any TC Website.

- **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 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 (or with a Lender or Borrower connected to 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, the Lender, Borrower or Third Party connected to you (for example, to provide services to such a Lender or Borrower). In this case, we may have to cancel a product or service a Lender or Borrower has with us (or we may be unable to offer such a product or service). We will notify the relevant Lender, Borrower or Third Party 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 personal data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you or a business connected to you:
  - ask us to provide 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 any TC Website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs, and other similar technologies.
- **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 UK;
    - (b) advertising networks based inside or outside the UK; and
    - (c) search information providers based inside or outside the UK.
  - Contact, Financial and Transaction Data from providers of technical, payment and delivery services based inside the EU.
  - Identity and Contact Data from data brokers or aggregators based inside the EU.
  - Identity and Contact Data from publicly availably sources such as Companies House and the Electoral Register based inside or outside the UK.
  - Risk and/or fraud information from fraud prevention and risk management agencies and report providers.
  - Credit reference agencies such as Callcredit, Equifax and Experian.
  - Fraud prevention agencies such as CIFAS, National Hunter and National SIRA.

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.
- 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.

Please see the Glossary 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 contacting us.

As part of our commitment to improving our services, we may use your personal data in generative or agentic AI systems within our operations. This enables us to improve customer support, streamline internal processes and deliver a personalised customer experience.

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 contact us 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 process and manage financial transactions of a Lender which you are connected to: (a) Manage payments, fees and charges (b) Collect and recover money	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Directorship (f) Shareholding (g) Risk and/or Fraud (h) Credit	(a) Performance of a contract with a Lender (b) Necessary for our legitimate interests (c) Comply with a legal or regulatory obligation
To undertake a risk assessment of a Borrower i that has made an application to us to become a Borrower. We may use credit reference agencies to assist us with this and in doing so we will share your personal information with them and they will give us information about you and your business	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Directorship (f) Shareholding (g) Risk and/or Fraud (h) Credit	(a) Performance of a contract with a Borrower (b) Necessary for our legitimate interests (assessing whether a business is suitable to be a borrower, verify information you have told us, and detect and prevent financial crime) (c) Comply with a legal or regulatory obligation
To accept a business in relation to a company or other entity which you are associated with . This may be acceptance as a borrower or another contractual relationship	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Directorship (f) Shareholding (g) Risk and/or Fraud (h) Credit	(a) Performance of a contract with a Borrower or other business (b) Necessary for our legitimate interests (to enter into an agreement with a borrower or other contract counterparty) (c) Comply with a legal or regulatory obligation
To process and manage the loan account of a Borrower which you are associated with. This may include (i) internal reporting, (ii) external reporting (for compliance with any legal or regulatory obligations) and (iii) continuing to share your information with credit reference agencies, risk management agencies and report providers, auditors (whether statutory, engaged by us or engaged by a third party), professional advisors, actual and	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Directorship (f) Shareholding (g) Risk and/or Fraud (h) Credit (i) Marketing and Communications	(a) Performance of a contract with a Borrower (b) Necessary for our legitimate interests (detect and prevent financial crime, our relationship with a Borrower, trace and recover debts) (c) Comply with a legal or regulatory obligation

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
potential lenders and/or institutional investors for so long as your business remains as a borrower with us		
To protect our business against fraudulent conduct we may share your information with fraud prevention agencies and they will give us information about you and your business To prevent or detect money laundering, fraud or other illegal activity we can carry out verification check, politically exposed person financial crime and sanctions checks Complying with any other legal or regulatory requirements including legitimate requests from law enforcement or regulatory bodies and agencies	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Directorship (f) Shareholding (g) Risk and/or fraud (h) Credit	(a) Performance of a contract with a Lender, a Borrower or another contract counterparty (b) Necessary for our legitimate interests (detect and prevent financial crime, manage our relationship with a Borrower or a Lender, trace and recover debts) (c) Comply with a legal or regulatory obligation
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey (c) responding to queries and communications with Borrowers in relation to loans applied for and/or received	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with a Borrower, a Lender or another contract counterparty (b) Necessary to comply with a legal obligation (c) Comply with a legal or regulatory obligation (d) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and any TC Website (including troubleshooting, data analysis, testing, system maintenance, support, reporting, institutional investor on-boarding 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 (c) Comply with a legal or regulatory obligation

Purpose/Activity	**Type of data**	**Lawful basis for processing including basis of legitimate interest**
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 customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve any TC Website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep any TC Website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)
Record keeping as required by laws, regulations and/or regulatory bodies	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Directorship (f) Shareholding (g) Risk and/or Fraud (h) Credit	(a) Comply with a legal or regulatory obligation
Developing the products and services we provide	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Directorship (f) Shareholding (g) Risk and/or Fraud (h) Credit (i) Technical (j) Profile (k) Usage	(a) Necessary for our legitimate interests

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

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 if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside the ThinCats Group for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Cookies

Any TC Website uses some cookies. A cookie is a small file of letters and numbers that we put on your computer if you agree. These cookies allow us to distinguish you from other users of a TC Website, which helps us to provide you with a good experience when you browse a TC Website and also allows us to improve our site. The cookies we use are "analytical" cookies. They allow us to recognise and count the number of visitors and to see how visitors move around the site when they are using it. This helps us to improve the way a TC Website works, for example by ensuring that users are finding what they are looking for easily. 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 a TC Website may become inaccessible or not function properly.

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 contact us.

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 in paragraph 4 above.

- Internal Third Parties as set out in the *Glossary*.
- External Third Parties as set out in the *Glossary*. See further below regarding credit reference agencies.
- Specific third parties listed in the table in *paragraph 4* above.
- 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.

When a loan to a Borrower is funded by more than one Lender (or an additional Lender is considering acquiring all or part of a loan) we may be required to share personal data for legal and tax purposes, including for the purposes of preventing financial crime and fraud.

When we ask credit reference agencies about you or your business, we may supply personal data relating to you to those credit reference agencies (CRAs) and they will give us information about you or your business, such as your financial history. We do this to assess creditworthiness and product suitability, check identities, manage your accounts, trace and recover debts and prevent criminal activity. The CRAs may note it on your credit file as a credit search. Other organisations that may see such note and we can see searches done by other organisations.

We will continue to exchange information about you or your business with CRAs on an ongoing basis, including any debts not paid in time. CRAs will share this information with other organisations. If there are other individuals relevant to a particular business then we may link your records with theirs. Credit reference agencies may also link your records together. These links will stay on your records unless you or the other relevant individuals linked to you ask the credit reference agency to break the link. You will normally need proof that you are no longer financially linked.

You can find out more about the CRAs and the ways in which they use and share personal data on their websites. The following are links to the information notice of the three main credit reference agencies:

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

Fraud Prevention Agencies – Fair Processing

The personal information we have collected from you will be shared with fraud prevention agencies 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 fraud prevention agencies, and your data protection rights, can be found in our Fair Processing Notice, a copy of which is set out in the Schedule to this Policy. *www.cifas.org.uk/fpn*.

6. International transfers

We do not transfer your personal data outside the UK, but it is possible that personal data may be transferred outside the UK in future.

In the event that we are required to transfer any personal data to any external third party which may be based outside the UK their processing of your personal data will involve a transfer of data outside the UK.

Whenever we transfer your personal data out of the UK, 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.
- Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.
- Where we use providers based in the US, we may transfer data to them only in accordance with UK GDPR, as defined below (i.e, one of a limited number of exceptions applies, or rights of individuals are protected in another way as specified by UK GDPR).

UK GDPR means the retained General Data Protection Regulation (*(EU) 2016/679*), and more particularly has the meaning given to it in section 3(10) (as supplemented by section 205(4)) of the Data Protection Act 2018. Personal data is subject to the legal safeguards specified in the UK GDPR.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

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, contractors 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.

Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting, or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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, regulatory, tax, accounting or other requirements.

By law we have to keep certain information in relation to Lenders (including Contact, Identity, Financial and Transaction Data) for seven years after they cease being Lenders for legal and tax purposes. Likewise, in the case of Borrowers, we retain this information for the lifetime of the loan and seven years after the loan term ends, again, for legal and tax purposes.

In some circumstances you can ask us to delete your data: see *Request erasure* below for further information.

In some 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.

8. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. In particular you may:

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.

If you wish to exercise any of the rights set out above, please contact us.

No fee usually required

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. Alternatively, we may refuse to comply with your request in these circumstances.

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.

9. 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 contacting us.

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

Internal Third Parties

- Other companies in the ThinCats Group acting as joint controllers or processors and who are based in the UK and provide IT and system administration services and undertake leadership reporting.

- **Thincats** Thincats Limited (Company No. 09707863) whose registered office is at 2 Snowhill, Snowhill Queensway, B4 6GA.

- **ThinCats Group** Thincats Group Limited (Company No. 13393055), Thincats, Business Loan Capital Limited (Company No. 09867563), ESF Loans Limited (Company No. 10725890), TC Loans I Limited (Company No. 097212350, TC Loans II Limited (Company No. 11680000), TC Loans Limited (Company No. 13031559), TC Security Trustee Limited (Company No. 12633574).

External Third Parties

- Service providers acting as processors based in the UK or the European Economic Area (**EEA**) who provide IT and system administration services.
- Service providers based in the UK or the EEA who act as agents or servicers in relation to the business activities of the Thincats Group.
- Professionals acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the UK or EEA who provide 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.
- Potential institutional investors acting as processors who require reporting of processing activities and loan portfolios in certain circumstances. These are usually based in the UK or EEA.
- Lenders based in the UK or EEA who require information regarding lending activities in relation to which they are actual or prospective lenders.
- Financial processing providers acting as processors or joint controllers based in the United Kingdom who provide transactional and administration services.
- Identity agencies acting as processors or joint controllers based in the United Kingdom who provide identity checking services.
- Credit reference agencies (CRAs) such as Callcredit, Equifax and Experian.
- Fraud prevention agencies such as CIFAS, National Hunter and National SIRA.

Schedule – Fraud Prevention Agencies Fair Processing Notice

GENERAL

(a) Before we provide services, goods or financing to you, we undertake checks for the purposes of preventing fraud and money laundering, and to verify your identity. These checks require us to process personal data about you.

(b) The personal data you have provided, we have collected from you, or we have received from third parties will be used to prevent fraud and money laundering, and to verify your identity.

(c) Details of the personal information that will be processed, for example: name, address, date of birth, address, contact details, financial information, employment details, device identifiers including IP address and vehicle details.

(d) We and fraud prevention agencies may also enable law enforcement agencies to access and use your personal data to detect, investigate and prevent crime.

(e) We process your personal data on the basis that we have a legitimate interest in preventing fraud and money laundering, and to verify identity, in order to protect our business and to comply with laws that apply to us. Such processing is also a contractual requirement of the services or financing you have requested.

(f) Fraud prevention agencies can hold your personal data for different periods of time, and if you are considered to pose a fraud or money laundering risk, your data can be held for up to six years.

(g) You can request confirmation of which fraud prevention agencies we use from time to time. If you require this confirmation please contact us at dataprotectionoffice@shawbrook.co.uk or Date Protection Office, Lutea House, Warley Hill Business Park, The Drive, Great Warley, Brentwood, Essex, CM13 3BE.

(h) If we, or a fraud prevention agency, determine that you pose a fraud or money laundering risk, we may refuse to provide the services and financing you have requested, or to employ you, or we may stop providing existing services to you.

(i) A record of any fraud or money laundering risk will be retained by the fraud prevention agencies, and may result in others refusing to provide services, financing or employment to you. If you have any questions about this, please contact us on the details above.

DATA TRANSFERS

(j) Fraud prevention agencies may allow the transfer of your personal data outside of the UK. This may be to a country where the UK Government has decided that your data will be protected to UK standards, but if the transfer is to another type of country, then the fraud prevention agencies will ensure your data continues to be protected by ensuring appropriate safeguards are in place.

YOUR RIGHTS

(k) Your personal data is protected by legal rights, which include your rights to object to our processing of your personal data; request that your personal data is erased or corrected; request access to your personal data.

(l) For more information or to exercise your data protection rights, please contact us using the contact details above.

(m) If you are unhappy about how your personal data has been used please refer to our complaints policy. A copy can be obtained by contacting us at complaints@thincats.com or Complaints, Thincats, Arca, Temple Row, Birmingham, B2 5AF. You also have a right to complain to the Information Commissioner's Office (www.ico.org.uk), which regulates the processing of personal data.

Version No.	Policy Approval and Sign Off log		
v.1	Management Committee	TBC	TBC
v.7	Mark Guttridge	October 2021	Approved (minor amendments not requiring risk committee approval)
v.8	Mark Guttridge	January 2022	Approved (minor amendments not requiring risk committee approval)
v.9	Management Risk Committee	September 2022	Approved
v.10	Management Risk Committee	May 2023	Approved
v.11	Management Risk Committee	May 2024	Approved
v.11.1	Management Risk Committee	August 2024	Approved
v.12	Management Risk Committee	23 September 2025	Approved
v.12.1	Management Risk Committee	18 March 2026	Approved
v.12.2	Ian Ilersic	26 March 2026	No approval required

Version No.	Version History		
v.1	Samantha Gray	August 2018	Drafted
v.1.1	Samantha Gray	May 2019	
v.2	Samantha Gray	February 2020	Amendments re DD collection
v.3	Samantha Gray	April 2020	Amendments to include CATO CRA wording for Experian
v.4	Samantha Gray	July 2020	General Review
v.5	Samantha Gray	January 2021	To extract BLN from for separate Platform Privacy Policy
v.6	Mark Guttridge	March 2021	General Review
v.7	Ian Ilersic	October 2021	Update Thincats registered office. Update definition of ThinCats Group
v.8	Ian Ilersic	January 2022	General Review
v.9	Ian Ilersic	September 2022	Update to reflect change of company name
v.10	Ian Ilersic	May 2023	Update to add fair processing notice provisions relating to use of fraud prevention agencies
V.11	Ian Ilersic	May 2024	Annual review and revision
V.11.1	Ian Ilersic	August 2024	Updated to reflect change of address only

			(no substantive review)
v.12	Ian Ilersic	August 2025	Annual review and revision
v.12.1	Ian Ilersic	March 2026	Minor revision
v.12.2	Ian Ilersic	March 2026	Change of contact details only

The owner of this document is Ian Ilersic. If you have any queries or comments regarding the information contained in the document, please contact:

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