FOLK 2 FOLK

PRIVACY POLICY

Version 6 - September 2024

FOLK2FOLK Limited ("We") are committed to protecting and respecting your privacy.

This policy (together with our Website Terms of Use and any other documents referred to within it) sets out the basis on which any Personal Data we collect from you, or that you or your referees or credit check agencies or other third parties provide to us, will be processed by us and how the law protects you. Please read the following carefully to understand our views and practices regarding your Personal Data and how we will treat it.

This policy is provided in a layered format so that you can click through to the specific areas set out below. Alternatively, you can download a version of the policy *here*. Please also use the glossary to understand the meaning of some of the terms used in this privacy policy.

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1. IMPORTANT INFORMATION AND WHO WE ARE

Purpose of this privacy policy

This privacy policy aims to give you information on how FOLK2FOLK Limited collects and processes your Personal Data in person, in writing, by telephone, by email, or through your use of our website, including: any data you may provide via our website or our social media when you fill out any form, sign up to our newsletter or to an event, use our services, take part in a competition, or call us using the number that appears on the website. It also refers to data purchased via reputable third parties or via our own research from publicly available information. References in this policy to our "website" include FOLK2FOLK's website at www.folk2folk.com, and any and all associated FOLK2FOLK online portal, platform, social media channel, or app, as well as third-party online tools we may use that collect contact data such as EventBrite.

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 policy 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 policy supplements the other notices and is not intended to override them.

Controller

FOLK2FOLK is made up of different legal entities; Folk Group Limited (09732571), FOLK2FOLK Limited (08178576), Folk Nominee Limited (09939972) and Folk (UK) Limited (08931649) This privacy policy is issued on behalf of the FOLK2FOLK Group so when we mention "FOLK2FOLK", "FOLK2FOLK Limited", "we", "us" or "our" in this privacy policy, we are referring to the relevant company in the FOLK2FOLK Group responsible for processing your data. FOLK2FOLK Limited will be the controller for your data when you use our services and is responsible for this website.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, 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:	FOLK2FOLK Limited
Name or title of DPO:	Claire Richards
Email address:	DPO@FOLK2FOLK.com
Deputy DPO:	Andrew Marsh
Email address:	DPO@FOLK2FOLK.com
Postal address:	Number One Business Centre, Western Road, Launceston, PL15 7FJ
Telephone number:	(01566) 773296

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 policy and your duty to inform us of changes

This version was last updated on 26th September 2024 and historic versions can be obtained by contacting us.

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

Our 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. DATA WE COLLECT ABOUT YOU

We will collect and process the following data about you:

Information you give us

This is information about you that you give us by using our online platform; filling in forms online or on paper; or by corresponding with us in person, in writing, by phone, email or via our website or social media platforms.

It includes information you provide when you visit our website, register to use our website, download information from our website, fill out a form on our website, subscribe to our service, subscribe to our newsletters, search for a product, participate in discussion boards or other social media functions on our website or digital platforms, enter a competition, promotion or survey.

It includes information you provide when you apply to become an investor or borrower with us; supply documents to us in order to carry out anti-money laundering checks; supply information in the context of buying and selling existing loans on our secondary market; use our secure area where you can read and accept/sign documents; use any shareholder area that may be available to shareholders with registered shares; when you lodge a complaint; and when you report a problem with our website.

The information you give us may include your name, username or similar identifier, marital status, title, date of birth and gender, address, email address and phone number, financial and credit information, personal description, social media profile, photograph, company name, and job title.

Information we collect about you

On each of your visits to our website we will automatically collect the following information:

Technical information, including the Internet Protocol (IP) address used to connect your computer to the Internet, 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 this website.

- 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), methods used to browse to and away from the page, and any phone number used to call us.
- We also collect, use, and may 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 policy.

Information we receive from other sources

In applying to or becoming one of our customers, we will receive information about you from a wide variety of sources including credit reference agencies, anti-money laundering providers, brokers, accountants, solicitors, and other reference agencies. We are 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, your referees).

We may be provided with Special Categories of Personal Data about you strictly on the basis that you have given your explicit consent for this information to be shared with us. Typically, this will include details relating to your health which will form part of our decision-making process when deciding to approve your loan application. We ask for this information to ensure that we undertake a considered and sensible lending practice. We may also collect information about criminal convictions and offences.

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. In this case, we may have to cancel a service you have with us, but we will notify you if this is the case at the time.

3. HOW YOUR PERSONAL DATA IS 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 using our online platform, filling in forms or by corresponding with us in person, by post, phone, email, online or otherwise. This includes Personal Data you provide when you:

- enquire about our services by phone, in person, in writing, via email, or social media, our website or other online channels.
- apply to be an investor or borrower.
- communicate with us via social media.
- subscribe to our publications or newsletter.
- download information from our website that requires you to enter your details.
- register for a FOLK2FOLK webinar or event.
- fill out a website form, enter a competition, promotion, or survey.
- give us feedback.
- give us your business card or supply us with your contact details at an event.

Automated technologies or interactions

As you interact with our 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 including Google Analytics. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookies policy for further details.

Third parties or publicly available sources

We may source, purchase, or receive Personal Data about you from various third parties and public sources, including those parties set out below, as well as Technical Data from parties such as Google and Facebook based outside the UK, as well as information providers based inside the UK.

- Contact, Financial and Transaction data from providers of technical, payment and delivery services such as Experian, LexisNexis and Inkerman based inside the UK.
- Identity and Contact Data from publicly availably sources such as the Electoral Register based inside the UK and Companies House.
- Contact Data purchased from reputable UK based data sources or supplied as a referral or via word of mouth. Also Contact Data available publicly via websites, online directories, and membership organisations such as the CLA.
- Contact and Financial Data from UK based third party sources such as our Broker Partners, Marketing Partners and other introducers and intermediaries.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your Personal Data where the law allows us to. Most commonly, we will use your Personal Data in the following circumstances:

Information you give to us

We will use this information:

- to carry out our obligations arising from any agreements entered into between you and us and to provide you with the information, products and services that you request from us, which will include taking references from third parties such as a solicitor or accountant.
- to provide you with information about other goods, services, and activities we offer that are similar to those that you have already purchased, enquired about or been involved in where permitted by data protection law.
- to notify you about changes to our company and the service provided to you, including product, company, and industry updates.
- to ensure that content from our site is presented in the most effective manner for you and for your computer.
- 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 legal or regulatory obligations.

Information we collect about you

We will use this information:

- to administer our business and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.
- to improve our website to ensure that content is presented in the most effective manner for you and for your computer.
- to allow you to participate in interactive features of our service when you choose to do so.
- as part of our efforts to keep our website safe and secure.
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you.
- to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.

Information we receive from other sources

We will combine this information with information you give to us and information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

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 register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver our services including: (a) Manage payments, fees, and charges (b) Collect and recover money owed to us (c) Process loan applications	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)

To develop, manage and maintain our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Keeping you updated on our products, the company, our industry. (c) Inviting you to webinars and events we think may be of interest to you. (d) Asking you to leave a review, provide feedback, recommend a friend, take a survey, allow you to participate in a prize draw or competition. (e) To make other suggestions and recommendations to you about goods, services, events, or other relevant information that we think may be of interest to you	(a) Identity (b) Contact (c) Profile	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests, or where we have your consent to contact you with Marketing Communications, to develop, manage and maintain our relationship with you and to develop our products/services and grow our business
To administer and protect our business, website, our Investor Portal, any FOLK2FOLK Apps and other online platforms (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, 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) (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop relevant content, to grow our business and to inform our marketing strategy)
To use data analytics to improve our 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 our website updated and relevant, to develop our business and to inform our marketing strategy)
To process criminal convictions and offences data for the protection of vulnerable customers and for credit risk assessment purposes	(a) Special Categories Data	Necessary for our legitimate interests (to identify vulnerable customers as required by our regulatory body the FCA and effectively credit risk assess)

Marketing and Communications

We communicate with our customers and contacts via email, telephone, social media, our Portals, website (www.folk2folk.com), and post. We may also communicate via an App and SMS. The type of communication includes:

- **Operational Communications**

  We communicate with shareholders, customers, brokers, valuers and other contacts regarding their loan(s), their investment(s) and investment opportunities, their customer/user experience of our platform, their client(s) or other contractual business with FOLK2FOLK. We also communicate information and updates about FOLK2FOLK Limited, and platform and product/service developments to relevant parties as we deem necessary or relevant.

- **Marketing Communications** (also known as Direct Marketing)

  We communicate with our customers via our newsletter and marketing emails, letters, social media, and other marketing materials, informing them of relevant industry news, FOLK2FOLK news, opinion, and performance, new product information, special offers and incentives, selected third party informational/educational content that we believe to be of interest and relevance to our customers, investment opportunities, and with invitations to webinars and events. Customers may unsubscribe at any time.

  We communicate with our professional and individual contacts (non-customer) via our newsletter, marketing emails, social media, and other emails and letters as we deem appropriate and timely, informing them of relevant industry news, FOLK2FOLK news, opinion, and performance, new product information, special offers and incentives, selected third party informational/educational content that we believe to be of interest and relevance to our contacts, and with invitations to webinars and events. Contacts may unsubscribe at any time.

If there is anything you do not understand please contact 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 in order to decide which products, services, events and information may be relevant for you.

You may receive Marketing Communications from us if: you are a current or past FOLK2FOLK customer; you have contacted us; met us; requested information from us; expressed an interest in or purchased services from us; if you provided us with your details when you filled out a form on our website or registered for a FOLK2FOLK webinar or event, called us, entered a competition, given us your business card or (otherwise) supplied us with your details; engaged with us on social media; or we've obtained your details via a partner, referral, word of mouth, a publicly available source, or we have purchased your details from a reputable source - in all cases where we have received your consent to do so or otherwise where we are permitted to send such communications under data protection law.

Third-party marketing

We will get your express opt-in consent before we share your Personal Data with any third party for marketing purposes.

Opting out

You can ask us to stop sending you Marketing Communications at any time by following the unsubscribe links on any marketing message sent to you or by contacting us at enquiries@folk2folk.com at any time.

When you opt out of receiving these marketing messages, this will not opt you out of receiving Operational Communications. We will continue to send Operational Communications to customers, brokers, valuers, and others who are in a contractual relationship with FOLK2FOLK because it is relevant, and in some instances essential, to the service we provide you.

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 our website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookies Policy here.

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 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. DISCLOSURE OF YOUR INFORMATION

We have the right to share your personal information with:

Internal Third Parties

- Any member of the FOLK2FOLK Group, details of which are set out at the start of this policy.

External Third Parties

Third parties with whom we share your personal information with:

- Institutional Investors who invest through FOLK2FOLK and any related intermediaries, may be given personal information about our Borrowers, for the purpose of facilitating and providing loans.
- business partners, suppliers, and sub-contractors for the performance of any contract we enter into with you.
- our chosen marketing agencies who may view a version of your customer data in order to better understand our existing and potential customer-base.
- our chosen PR agency may view details of your personal and customer data to create customer case studies for use on our website, in our social media, printed and digital marketing materials and PR. In these instances, we will always obtain your consent to be a customer case study in advance and explain how and where your customer information will be used.
- our chosen marketing distribution providers such as mailing houses and printers.
- our online advertising network who may view a version of your customer data in order to assist us in serving relevant adverts to you and others similar to you.
- web developers, analytics and search engine providers that assist us in the improvement and optimisation of our site.
- credit reference agencies for the purpose of both assessing your credit score (where this is a condition of us entering into a contract with you) and to update them in relation to your payment history with us.
- when obtaining references for you from parties such as your accountant or solicitor or other named referee.
- our service providers acting as processors based within the UK who provide IT, outsourcing and system administration services.
- our professional advisers acting as processors or joint controllers including lawyers, surveyors, bankers, auditors, and insurers based in the UK who provide their services to us.
- HM Revenue & Customs, the Financial Conduct Authority, HM Land Registry, and other regulators and other authorities acting as processors or joint controllers based in the UK who require reporting of processing activities in certain circumstances.
- fraud prevention agencies and law enforcement agencies based in the UK who we must report to.

We will disclose your personal information to third parties:

- If we sell or buy any business or assets, in which case we will disclose your Personal Data to the prospective seller or buyer of such business or assets.
- If FOLK2FOLK Limited or substantially all its assets are acquired by a third party, in which case Personal Data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your Personal Data in order to comply with any legal obligation, or in order to enforce or apply our Website Terms of Use or Terms and Conditions of supply and other agreements; or to protect the rights, property, or safety of FOLK2FOLK Limited, our customers, or others. This includes exchanging information with other companies and organisations

for the purposes of the prevention of tax avoidance and evasion, fraud protection and credit risk reduction.

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 AND WHERE WE STORE YOUR PERSONAL DATA

We may transfer and store your Personal Data outside the UK. Third parties with whom we share data may also process that data outside the UK. Whenever any restricted transfers take place, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following legitimate and approved safeguards is implemented:

- Adequacy Decisions
- Standard Contractual Clauses
- 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.

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.

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site or Portal, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

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.

Details of retention periods for different aspects of your Personal Data are available in our retention policy which you can request from us by contacting us.

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.

9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your Personal Data. See section 10 below for more detailed explanation of the following 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 contact the DPO or Deputy DPO by using the contact details set out at the start of this policy.

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.

10. GLOSSARY

Special Categories means Personal Data that needs more protection because it is sensitive. This includes data that relates to an individual's:

- Racial or ethnic origin.
- Political opinions.
- Religious or similar beliefs.
- Trade union membership.
- Physical or mental health conditions.
- Criminal convictions and offences information that is received from third party sources.
- Sexual life.
- Sexual orientation.
- Biometric or genetic data.

LAWFUL BASIS

Legitimate Interest means the interest of our business in growing, conducting and managing our business to enable us to give you the best service/product, the best and most secure experience and keep you informed. 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).

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 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.

Consent means you have given clear consent for us to process your Personal Data for Marketing Communications

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 your 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 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 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.

- **Right to withdraw consent**

  At any time if 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.

Where a person is authorised by a retail customer or by law to assist in the conduct of the retail customer's affairs (such as a power of attorney), we will provide the same level of support to that person that we would have provided to the retail customer.