

Introduction

We are committed to safeguarding and respecting the privacy of your personal data. This Privacy Policy explains what personal data we will collect from you and how we will use it.

This policy applies where we are acting as a data controller with respect to your personal data; in other words, where we determine the purposes and means of the processing of that personal data.

Please read the following information carefully to understand our practices regarding your personal data.

When you provide your personal details to us we use your information for our legitimate business interests to carry out our credit broking services.

Date Published: 04th of October 2023

I need to know the details of the Data Controller

Why we collect your personal data?

What is our lawful basis for processing of your personal data?

How we obtain your personal Information?

Categories of data we collect from you

Will we conduct a credit check?

Do we conduct Fraud Prevention and Detection?

Who we share your information with?

Will your data be transferred out of the EU, and if so, will it be safe?

How long we keep hold of your information?

Will you be subject to automated decision making?

What rights do you have in respect of the personal data we hold about you?

How to contact us should you wish to exercise any of your rights

What happens if you don't provide your personal details?

I didn't give you my personal details, so what is its source and what types of personal data are you processing?

About cookies& Pixels

Amendments to this Privacy Policy

1. I need to know the details of the Data Controller

- 1.1 This website is owned and operated by *Aspire Money Limited, Citrus Loans* which is a trading name of *Aspire Money Limited*.
- 1.2 We are registered in England under FCA registration number 681346, and our registered office is at Unit 1, Castle Court 2, Castlegate Way, Dudley, West Midlands DY1 4RH
- 1.3 Should you wish to confirm our registration details please [click here](#)
- 1.4 We are also registered with the Information Commissioners Office; under registration number Z1262766. Should you wish to confirm our registration details please [click here](#)
- 1.5 If you would like any further information on this policy, please contact us:
 - (a) by post to the postal address: PO BOX 15799, Solihull, B93 3GA
 - (b) using our website [contact form](#)
 - (c) by email using compliance@aspiremoney.co.uk

2. Why we collect your personal data?

- 2.1 We are a credit broker, and in order to establish your general eligibility against the lenders on our panel product criteria, we will need to collect and process certain categories of your personal data.
- 2.2 We will process the information contained in any enquiry you submit to us regarding our services. This information will be processed for the purposes of providing our services to you which will be finding you a lender to assist you with the loan options you are searching for
- 2.3 We and the panel of lenders will retain and use the personal data you provide us for statistical analysis and analytics regardless of whether or not you take up a loan with one of the lenders on our panel. Where we do this, we take strict measures to ensure that your personal data cannot be identified

3. What is our lawful basis for processing of your personal data?

Activity	GDPR Lawful Basis for Processing
Assessing product eligibility As a credit broker, we match your personal and financial circumstances to the lenders on our panel products and lending criteria. In order to do this, we	We require your personal information so that we can obtain the options available to you from the lenders on our panel. It is also in our legitimate interests, when you approach us, to undertake a number of checks to

<p>collect information either directly from you or through an introducer you have approached.</p> <p>As the first stage in this process, we will assess your general eligibility for the lenders' products by undertaking a number of checks with credit reference agencies and fraud prevention agencies.</p>	<p>assess your eligibility for a loan against our panel of lenders products.</p> <p>In some cases, we must undertake these checks to comply with a legal obligation, for example under anti-money laundering regulations.</p> <p>We have a regulatory obligation to assess whether you will meet the lenders criteria for a loan and to ensure you do not over-commit yourself. Our vulnerability checks are also designed to protect your vital interests.</p> <p>In carrying out this initial assessment, we may use automated decision systems that enable us to speed up our assessment. However, if we do this, you can ask us to assess your application manually if you wish.</p>
<p>Matching you with a lender on our panel</p> <p>Once we have completed our own checks, we will assess which lender meets your requirements based on your circumstances.</p> <p>We do this by using the lenders' underwriting criteria and the process is very similar to our own checks and includes a soft credit search which is an initial review of your credit history that is held with the credit reference agencies.</p>	<p>At this stage, working on behalf of one or more of the lenders on our panel, we are processing your information because it is necessary for us to assess your application against lenders' criteria and provide you with any options that are available to you before your application is submitted to the lender.</p> <p>In carrying out this assessment, we may use automated decision systems based on one or more of the lenders' underwriting criteria. Again, this speeds up our assessment, but you can ask us to assess your application manually if you would prefer.</p>
<p>Maintaining records of your application</p> <p>For legal, regulatory and administrative purposes we shall retain your personal information securely on our systems until there is no longer any requirement to retain it.</p>	<p>We have legal and regulatory obligations in respect of identifying fraud, money laundering and financial crime. As a business regulated by the Financial Conduct Authority, we also have regulatory reporting obligations.</p> <p>We will also retain your information in other circumstances where we have a legitimate basis for doing so, such as record keeping, dealing with any</p>

	enquiries or complaints from you and internal administration.
<p>Keeping you up-to-date</p> <p>The lenders on our panel products and services, they have available, will change over time.</p> <p>We would like to keep in touch with you, whether you have taken out a loan with one of the lenders on our panel, or where we have been unable on this occasion to provide you with any suitable options.</p>	<p>Where you have applied for a loan, we may contact you to keep you up to date with products and services which may be of interest.</p> <p>It is in our legitimate interests to do this, but of course you can tell us you would prefer us not to contact you by clicking on this link, unsubscribe@aspiremoney.co.uk and providing us with your full name, contact number (s) and postcode, so we can action this for you</p>

You have the right to opt out, regarding the future processing of your information. Opting out will not affect the lawful basis for processing of your data before you opted out.

In order to do this, please use any of the preferred methods of communication below

- a) by post, to the postal address PO BOX 15799, Solihull, B93 3GA
- b) using our website [contact form](#)
- c) by email using compliance@aspiremoney.co.uk

4. How we obtain your personal information?

There are different ways in which we obtain your data

- From our website, if you complete our online application form
- If you telephone us to make a loan application
- Certain Lenders and Financial Brokers may pass your information to us, should they be unable to assist you with a loan. Please note that if this is the case we will provide you with the identity of these individual firms.

5. Categories of data we collect from you

The categories of data that we collect are as follows:

- Collecting and recording details about any health issues you may have which may affect your understanding of our application process. Our vulnerability checks are designed to protect your vital interests.

- Loan amount you require
- Your name and date of birth
- Partner name and date of birth (should you request a joint application)
- Address Details
- Employment Details
- Partner Employment Details (should you request a joint application)
- Mortgage Details or Tenancy Details
- Bank Details
- Other Income & Expenditure you might incur
- Your Financial Status I.e. Bankruptcy, Defaults & Missed Credit Payments, Court Court Judgements, Individual Voluntary Arrangement and Debt Management Plan

6. Will we conduct a credit check?

In order to process your application, we will perform a soft credit check on you with one or more Credit Reference Agencies (“CRAs”).

To do this, we will supply your personal information to CRAs and they will give us information about you. The information we will supply to the Credit Reference Agency will include information from your application and about your financial situation and financial history. CRAs will supply to us both public (including the electoral register) and shared credit, financial situation and financial history information and fraud prevention information.

The information which we and other organisations provide to the credit reference and fraud prevention agencies may be supplied by credit reference agencies to other organisations and used by them to perform similar checks.

If you are making a joint application or tell us that you have a spouse or financial partner, we will link your records together, so you should make sure you discuss this with them, and share with them this information, before completing the application.

Soft credit searches are not visible to other companies so it has no impact on your credit rating or any future applications you may make.

We will use this information to:

- Assess your application against our panel of lenders criteria;
- Verify the accuracy of the data you have provided to us;
- Prevent criminal activity, detect fraud and money laundering;
- Ensure any options provided to you are appropriate to your circumstances.

We have included definitions to Soft and Hard credit searches below, to help you understand how these work

What is a soft credit search?

Not every instance of your credit report being checked by a lender will result in a visible ‘footprint’ being left on your report. There is such a thing as a ‘soft credit search’ or a ‘soft credit check’, which is recorded in your credit

history, but is not visible to other lenders. This includes things such as identity checks and quotations, where a company confirms the details you have provided are correct when offering you a quote.

What is a Hard Credit Search?

Hard searches are initiated when you make a formal application to a credit product, like a credit card, loan, or mortgage. Hard searches provide the lender with full access to your credit report so they can make an informed decision regarding your application. Each formal credit application you make will initiate a hard search that will show on your credit report for a year. Too many of these marks in a short period of time can reduce your credit score and scare off potential lenders, as too many credit applications in a short period of time may be a sign you are struggling financially.

The identities of the CRAs, their role also as fraud prevention agencies, the data they hold, the ways in which they use and share personal information, data retention periods and your data protection rights with the CRAs are explained in more detail which is accessible from each of the three CRAs.

The credit reference agencies used by us and our panel of lenders are Experian, Call Credit and Equifax.

Clicking on any of these three links will also take you to the Credit Reference Agency Information (CRAIN) document:

- **Call credit** www.callcredit.co.uk/crain
- **Equifax** www.equifax.co.uk/crai
- [n](#)
- **Experian** www.experian.co.uk/crai
- [n](#)

7. Do we conduct Fraud Prevention and Detection?

We may make searches of records held at fraud prevention agencies. If you give us false or inaccurate information and we confirm fraud, we will record this and may pass this information to fraud prevention agencies and other organisations to prevent fraud and money laundering. Law enforcement agencies may access and use this information.

We share personal data for crime and fraud prevention and the apprehension and prosecution of offenders.

We and other organisations may access and use from other countries the information recorded by fraud prevention agencies.

The information which we, other organisations and fraud prevention agencies provide to the credit reference and fraud prevention agencies about you and your financial associates may be supplied by the credit reference and fraud prevention agencies to other organisations and used by us and them for example to:

- Prevent fraud and money laundering,
- Verify your identity if you or your financial associate applies for other facilities including all types of insurance applications and claims,

- Assist other organisations to make decisions on credit and credit related services or other facilities,
- Trace your whereabouts and recover debts that you owe,
- Managing credit and credit related accounts and other facilities; and
- Undertake statistical analysis and system testing.
- Checking details on applications for credit and credit related accounts or other facilities.
- Checking details of job applicants and employees.

8. Who we share your information with

a) The panel of Lenders and specialist companies we work with

We work closely with various lenders and specialist companies to bring you a range of products and services designed to meet your needs. When you enquire about one or more of these products, the relevant lender/company will use your details to provide you with information and carry out their obligations arising from any application or contract you have entered into with them. These companies will be acting as a data controller of your information and therefore we advise you to read their Privacy Policy. These companies may share your information with us which we will use in accordance with this Privacy Policy.

Please see below a list of companies that we may share your information with

Everyday Lending Limited	One Stop Money Shop
Motiv Finance	Financial Wellness Group
TM Advances	Norton Finance
One Plus One	DFH Financial Solutions, trading name of Bridgewater Support Solutions
Multa (Trading Style of Twibli Limited)	My Community Finance
Money Plus Group	Fluent Money
Loqbox	Toot Loans
Savvy.co.uk	
Finio Loans	
118 118 Money	
Salad Money	
Salary Finance	
Loans By Mal trading name of Monthly Advance Loans Limited	

Where we submit your personal data to the lenders on our panel to assess your application against the lenders' criteria and provide you with an option, to which you subsequently decide you do not want to proceed with, please take note of the below regarding the retention of your data by the lender.

Some lenders will retain your information for statistical analysis and analytics, to defend possible future legal claims, under applicable statutory requirements and any relevant industry guidelines. Where your information has been passed over to lender(s) on our panel you will need to contact them or refer to the lender privacy policy regarding the data retention timescales.

In some circumstances, you have the right to ask that the lender erase your personal information where it is no longer required.

Those circumstances include:

- the personal data that they hold is no longer necessary in relation to the purposes for which it was collected or otherwise processed;
- you object to the processing under certain rules of applicable data protection law;
- the processing is for direct marketing purposes;
- the personal data have been unlawfully processed

However, there are exclusions of the right to erasure.

The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.

If your information has been passed over to lender(s) on our panel you will need to contact them, requesting to exercise your right to erasure, regarding the information they hold about you.

b) Service Providers

We may provide your personal information to anyone who hosts or maintains data centres, service platforms and other infrastructure and systems on behalf of us, where your personal information is processed and/or stored;

Except as described above, we will not disclose your personal information to Third Parties, without your consent.

Please be reassured that we will not release your information to third parties beyond our firm and its trading styles for them to use for their own direct marketing purposes, unless you have requested us to do so, or we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime.

Measures will also be taken to safeguard against unauthorised or unlawful processing and accidental loss or destruction or damage to data.

We may transfer your personal information to a third party as part of a sale of some or all of our business and assets to any third party or as part of any business restructuring or re-organisation.

We may also disclose personal information about you to the extent required by Law, Court Order, by Government order or decree.

However, we will take steps with the aim of ensuring that your privacy rights continue to be protected.

The below table shows the list of Service providers that we will provide your personal information to

IomartHosting (Titan)	Connex One
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Car Finance Loan Options

Aspire Money works with Motiv Finance a company registered in the UK with company number 11517060. Motiv Finance is a credit broker and not a lender, their aim is to make financing a car cheaper, simpler and easier for customers looking to purchase a car. Motiv Finance operates an innovative price comparison site focused on helping you understand the options available to you when financing your next car.

Where you enquire with us for a loan option for purchasing a car, we will assess your application, based on the information you have or will provide, for a suitable loan option through Motiv Finance and their panel of lenders.

Motiv is registered with the Information Commissioners Office (registration number ZA477716).

Motiv works closely with various lenders and specialist companies to bring you a range of products and services designed to meet your needs

Please see below a list of companies that we may share your information with

Oodle
My Car Credit trading name of Evolution Funding LTD
CarFinance 247
CreditPlus
Moneybarn – A trading style of Moneybarn No.1 Limited.

To view Motiv Finances' Privacy Policy and Full terms and conditions, please click on the relevant link below

Aspire Money Privacy policy
V50 04.10.2023

(Privacy Policy) <https://motivfinance.co.uk/Privacy>

(Terms & Conditions) <https://motivfinance.co.uk/Terms>

Open Banking

Equifax and ConsentsOnline have been engaged by Aspire Money to share your account Transaction Data with the lenders on our panel as part of our Open Banking Service.

ConsentsOnline is registered with the Financial Conduct Authority as an Account Information Services Provider (AISP). ConsentsOnline will, with your permission:

- use your name and financial account details to request access to your financial account;
- collect your Transaction Data and (with the use of its subcontractor, AccountScore Limited – please see below) analyze and categorize your Transaction Data as instructed by you or the Approved Recipient;
- provide your Transaction Data and any Analysed Data to Equifax so that Equifax can make that information available to the Approved Recipient; and
- provide account information services directly to you, including by making your Transaction Data available to you via an online portal.

Equifax has an agreement in place with Aspire Money to provide the above noted services via ConsentsOnline. This means that Equifax's processing of your personal data is more limited, and includes:

- verifying your identity and financial account details by comparing this information with the financial data it already holds about you; and
- making the Transaction Data and analysis of that data (provided by ConsentsOnline) available to the Approved Recipient.

To view Equifax and ConsentsOnline Privacy Policy please click on the relevant link below

<https://consents.online/Privacy>

9. What happens if your enquiry has been declined with us?

Where we cannot assist you with a loan option through the lenders on our panel, we will share your information with one of our partner companies called StopGoNetworks. This option is entirely your decision and you will be given the opportunity to decide whether or not you want to proceed with them. This is an automated process which means you will not need to complete another enquiry with this company should you wish to proceed with them, your data will be shared with them via an automated process.

Once StopGoNetworks receives your data, they will send your data to the lenders on their panel and automatically refer you to the lender who is willing to provide you with an option. This is an online process, making it easier for you to manage on your own.

10. Will your data be transferred or processed out of the EU, and if so will it be safe?

As part of the services offered to you through this website, the information which you provide to us may be transferred to lenders in countries outside the European Union ("EU").

If we transfer your information outside of the EU in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this Policy.

Your data will be processed at our call centre based in South Africa.

If we process your information outside of the EU in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this Policy.

By submitting your personal data, you're agreeing to this transfer, storing or processing of your data.

11. How long we keep hold of your information?

- a) Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- b) **Personal data categories will be retained for a minimum period of 12 months following the date of your enquiry, and for a maximum period of 6 years following the date of your enquiry.**

12. Will you be subject to automated decision making?

We may use automated decision systems once your loan application is submitted to us. This is done in an effort to ensure that we are able to assess your eligibility for a loan against our panel of lenders criteria and ultimately provide you with the loan options available for you to consider.

13. What rights do you have in respect of the personal data we hold about you?

Your principal rights under data protection law are:

- 13.1 the right to access your information

- 13.2 the right to rectification
- 13.3 the right to erasure where records are no longer required
- 13.4 the right to object to Processing where this use is based on our legitimate interests
- 13.5 the right to restrict processing
- 13.6 the right to complain to a supervisory authority

13.1 The right to access your information

You have the right to confirmation as to whether or not we process your personal data and, where we do, access to that personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, at your request, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee.

If your information has been passed over to our panel of lender/s you will need to contact them requesting the information they will hold about you.

13.2 The right to rectification

You have the right to have any inaccurate personal data that we hold about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.

If your information has been passed over to lender(s) on our panel you will need to contact them requesting them to correct any inaccurate information they may hold about you.

13.3 The right to erasure, where records are no longer required

In some circumstances you have the right to the erasure of your personal data without undue delay.

Those circumstances include:

- the personal data that we hold is no longer necessary in relation to the purposes for which it was collected or otherwise processed;
- you object to the processing under certain rules of applicable data protection law;
- the processing is for direct marketing purposes;
- the personal data have been unlawfully processed

However, there are exclusions of the right to erasure.

The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.

If your information has been passed over to lender(s) on our panel you will need to contact them requesting to exercise your right to erasure, regarding the information they hold about you.

13.4 the right to object to Processing where this use is based on our legitimate interests

To the extent that we may contact you to keep you up to date with services that may be of interest to you and this is based on our legitimate interests to do so, you have the right to unsubscribe to this service at any time. Opting out of this will not affect the lawful basis for processing of your data before you opted out.

This does not automatically mean that we need to erase your personal data, and in most cases, it will be preferable to suppress your details. Suppression involves retaining just enough information about you to ensure that your preference not to receive future communications on products or services is respected.

If your information has been passed over to lender(s) on our panel you will need to contact them requesting to exercise your rights to object to any processing, regarding the information they hold about you and any other consent you may have provided to them over the use of your information.

13.5 The right to restrict processing

In some circumstances you have the right to restrict the processing of your personal data.

Those circumstances are:

- you contest the accuracy of the personal data;
- processing is unlawful but you oppose erasure;
- we no longer need the personal data for the purposes of our processing, but we require personal data for the establishment, exercise or defence of legal claims;
- you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data.

However, we will only otherwise process it, for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

If your information has been passed over to lender(s) on our panel you will need to contact them requesting to exercise your right to restrict processing, regarding the information they hold about you.

13.6 The right to complain to a supervisory authority

If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection, the Information Commissioners office.

Information Commissioners Office Contact Details

You can call their helpline on 0303 123 1113 (local rate – calls to this number cost the same as calls to 01 or 02 numbers).

We would welcome the opportunity to investigate any complaint you have, you can do this by:-

- a) emailing us at: compliance@aspiremoney.co.uk
- b) writing to us at: PO BOX 15799, Solihull, B93 3GA

14. How to contact us should you wish to exercise any of your rights

You may exercise any of your rights in relation to your personal data by specifying the details of your request to:-

- a) email us at: compliance@aspiremoney.co.uk
- b) write to us at: PO BOX 15799, Solihull, B93 3GA

15. What happens if you don't provide your personal details?

In order to process your loan enquiry, we will require you to complete our online loan application, or telephone our contact centre and complete an application with one of our consultants. We require this information to assist you in finding you loan options. If you do not provide us with this information, we will be unable to carry out our services to you as a credit broker.

To find out what personal data we require from you please click here {insert link to "[For what purposes are personal data being processed and what is the legal basis for it?](#)"} }

16. I didn't give you my personal details, so what is its source and what types of personal data are you processing?

We may receive information about you if you use any of our other websites i.e. Citrus Loans which is a Trading name of Aspire Money Limited.

We also work closely with third parties for example other Credit Brokers, Business partners and Lenders who you may have contacted you to assist you with your loan enquiry. These third-party companies may have been unable to assist you with your enquiry and may have noticed that we could possibly assist you, in this case they will have passed your information to us, ensuring that you have been informed and have agreed to your information been processed in this way.

17. About cookies

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

Like many other websites, this website uses cookies. 'Cookies' are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. They collect statistical data about your browsing actions and patterns and do not identify you as an individual. For example, we use cookies to store your preferences, and to record session information, such as length of visit. Depending on the type of cookie we use, cookies also allow us to make our web site more user friendly, for example, permanent cookies allow us to save your password so that you do not have to re-enter it every time you visit our web site.). This helps us to improve our website and deliver a better more personalised service.

Below is a table of information which lists all cookies used on our website.

OWNER COOKIE	COOKIE NAME	COOKIE DESCRIPTION
Google Analytics	_utma	A Google Analytics cookie, which keeps track of the number of times, a visitor has been to the site, when their first visit was, and when their last visit occurred.
Google Analytics	_utmb	A Google Analytics cookie, which creates a timestamp of the exact moment when a visitor enters a site.
Google Analytics	_utmc	A Google Analytics cookie, which creates a timestamp of the exact moment when a visitor leaves the site.
Google Analytics	_utmz	Used for reporting in Google Analytics classifying the visitor.
Google Analytics	_utmv	A Google Analytics cookie which tracks where the visitor came from, what search engine was used, what link was clicked on, what keywords used, and where in the world the site was accessed from.

Information regarding the use of Pixels

The pixels used, are not set up to collect personally identifiable data such as names, email addresses. As such the pixel tag can't be used to track anything back to an individual.

Third party media owner pixels – e.g. DBM, Quantcast etc

We have some of these pixels on our site, and these are used for the following techniques:

- Building an audience (retargeting, lookalike, exclusions)
- Optimising
- To model the data
- Reporting

18. Amendments to this Privacy Policy

We may update this policy from time to time by publishing a new version on our website.

You should check this page occasionally to ensure you are happy with any changes to this policy.