



## **PRIVACY, DATA PROTECTION AND DATA RETENTION STATEMENT**

### **OUR CONTACT DETAILS**

Name: Coventry & Warwickshire Reinvestment Trust (CWRT)  
Address: Enterprise Centre Coventry University Technology Park, Puma Way, Coventry  
CV1 2TT  
Phone Number: 02476 551777 E-mail: [compliance@cwrt.uk.com](mailto:compliance@cwrt.uk.com)

All the data CWRT collects and stores will be in accordance with Data Protection legislation as amended and updated from time to time. We are the Data Controller, and we are registered with the Information Commissioner's Office. Our data protection registration number is Z9306273.

### **THE TYPE OF PERSONAL DATA WE COLLECT**

We will collect and process the following information:

- Personal identifiers, contacts, and characteristics (for example, name and contact details)
- Documentation for Identification Verification

### **THE TYPE OF SPECIAL CATEGORY DATA WE COLLECT**

We will collect and process the following information:

- Personal data revealing ethnic origin
- Personal data concerning health

### **HOW WE GET THE PERSONAL INFORMATION AND WHY WE HAVE IT**

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- Product eligibility
- Data verification and credit referencing
- Legal and policing reasons including intellectual property and FCA certification requirements
- Accounting purposes
- Providing data to funders as specified in contracts
- Sharing with partners and suppliers
- Assessing suitability to join initiatives
- For ongoing review and improvement of our services

We may share personal data internally as necessary. We will always ensure that personal data is only shared with authorised persons and is shared in accordance with the purposes stated in any privacy notice or consents. Extra care and security will be taken when sharing special categories of data.

### **USE STORAGE, AND RETENTION OF YOUR DATA**

**General** - CWRT will make every effort to delete information no longer needed whether it be held in hard copy or digital format. In pursuit of this aim the organisation will define the retention period for each type of record and ensure that this timing is notified to information providers.

Your information is securely stored, and we will not keep your data for longer than it is required, as directed by the UK General Data Protection Regulation (UK GDPR).

We may disclose your personal data to our funders and third parties working in partnership with CWRT (for example for to support project/research evaluation and audit purposes) or where we are required to do so by law to comply with our contractual obligations.

This may include sharing information with the British Business Bank (BBB), the Department for Business and Trade (DBT), and other accredited lenders participating in joint government-backed initiatives such as CEF, where this is required for audit, monitoring, reporting or compliance.

## **WHO WE WILL SHARE YOUR DATA WITH AND WHY**

**Experian Commercial CAIS** In order to process your application, we will supply your personal information to credit reference agencies (CRAs) and they will give us information about you, such as about your financial history. We do this to assess creditworthiness and product suitability, check your identity, manage your account, trace and recover debts and prevent criminal activity. We will also continue to exchange information about you with CRAs on an ongoing basis, including about your settled accounts and any debts not fully repaid on time. CRAs will share your information with other organisations.

The identities of the CRAs, and the ways in which they use and share personal information, are explained in more detail at <http://www.experian.co.uk/crain/index.html>

**Business Support Programme** - all personal information that is provided to us as part of the Coventry & Warwickshire Business Support Programme will be dealt with in accordance with this policy and our funders policy. Our funders privacy policy may be obtained from <https://www.warwickshire.gov.uk/privacy> and <https://www.coventry.gov.uk/freedom-information-environmental-information-regulations/coventry-city-council-privacy-notice>

**European Regional Development Funded (ERDF) Project** - Information collected as part of an ERDF funded project such as Creative Springboard will be kept for a period of 10 years after the end of the ERDF funded project. The details collected as part of our current projects will be stored securely and retained until 2033 in compliance with the ERDF requirements. We will only use your data for this programme and not for marketing or commercial purposes.

**Government backed initiatives and guarantees:** DBT (The Department for Business and Trade) through The British Business Bank (BBB) offers accredited lenders like us with guarantees to partially cover the credit risk of CWRT which enables us to provide debt finance to SMEs. The cover does not remove borrower's liability, each borrower remains 100% liable for the repayment of each facility. In some accredited programmes, such as the Community ENABLED Fund (CEF), operational systems provided by third parties (for example banking or reporting platforms) may allow access by the British Business Bank and other accredited lenders where required for monitoring, audit, reporting and compliance purposes. CWRT participates in these systems on the basis of contractual obligation and legitimate interest, and only the minimum necessary information is shared for these purposes.

Information collected as part of a government back initiative such as the Enterprise Finance Guarantee (EFG) or the Coronavirus Business Interruption Scheme (CBILS), Recovery Loan

Scheme (RLS) and Government Guarantee Scheme (GGS) will be kept for 10 years after the loan is repaid. The information collected is shared with DBT and BBB and used for data analytics, meeting reporting obligations to the UK government. Our patron's data protection policy can be found on the BBB Privacy Notice.

**System and software** - all personal information that is provided to us using these systems will be dealt with in accordance with this policy and our suppliers policy.

SOAR Open Banking and Loan Case Management System - <https://www.soar.tech/privacy-policy>

Signable - <https://www.signable.co.uk/privacy-policy>

### **SHARING WITH REGULATORS, GOVERNMENT BODIES, ACCREDITED LENDERS AND PROGRAMME PARTNERS**

In addition to the partners and suppliers referenced elsewhere in this statement, CWRT may share personal data with the following organisations where this is necessary to deliver our services, comply with our legal or contractual obligations, or fulfil the requirements of government-backed programmes:

- Regulators, including the Financial Conduct Authority (FCA) and the Information Commissioner's Office (ICO).
- Government departments, including the Department for Business and Trade (DBT).
- The British Business Bank (BBB) and its subsidiaries, in line with the requirements of government-backed guarantee schemes and accredited programmes.
- Accredited lenders and delivery partners participating in programmes such as the Community ENABLED Fund (CEF), where sharing of information is required for monitoring, reporting, audit, risk management or compliance with scheme rules.
- Banking, reporting and operational system providers, where shared infrastructure is used to administer government-backed lending schemes.

Where CWRT participates in shared systems or platforms administered for government-backed initiatives, certain data may be visible to the BBB or other accredited lenders where this access is necessary to operate, monitor or audit the programme. CWRT only shares the minimum data required for these purposes and ensures that all data is accessed, used and retained strictly in accordance with contractual and regulatory requirements.

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

- Your consent
- We have a contractual obligation
- We have a legal obligation
- We have a vital interest
- We have a legitimate interest

### **YOUR DATA PROTECTION RIGHTS**

Under data protection law, you have rights including:

**Your right of access** - You have the right to ask us for copies of your personal information.

**Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

**Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.

**Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

**Your right to object to processing** - You have the right to object to the processing of your personal information in certain circumstances.

**Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances. You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

### **How to complain**

If you have any concerns about our use of your personal information, you can make a complaint to us at [customercomplaints@cwrt.uk.com](mailto:customercomplaints@cwrt.uk.com)

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:  
Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>