



Privacy Notice for Business Referrals

This privacy notice explains how your personal information will be used when your business is referred by Responsible Finance to a Community Development Finance Institution (CDFI) for business support and finance options and services, through a business referral pilot. The pilot is supported by Lloyds Banking Group.

Who is collecting your information?

Your information is initially collected by **Lloyds Banking Group**, and shared with:

- **Responsible Finance** (RF), who coordinate the business referral pilot, and
- **One of the following CDFIs**, who will contact you about relevant business support and finance options and services.
 - ART Business Loans
 - BCRS Business Loans
 - Business Enterprise Fund
 - Business Enterprise Fund, North East
 - Coventry & Warwickshire Reinvestment Trust
 - DSL Business Finance
 - Enterprise Answers
 - Finance for Enterprise
 - First Enterprise
 - The FSE Group
 - The Growth Company
 - Let's Do Business Group
 - River Capital
 - SWIG Finance Ltd

These organisations are independent data controllers under UK GDPR and each is separately responsible for how they process your data.

What personal data do we collect?

The following personal data is shared between these organisations:

- Business name
- Contact name
- Email address
- Business address,

relating to a business which has been referred under the business referral pilot.



No financial information is collected at the point of referral to the CDFI.

Why do we collect this data?

Your data is collected to:

- Assess your eligibility for business support or finance options and services via the CDFI.
- Allow the CDFI to contact you and offer relevant business support or finance options and services.
- Occasionally invite you to provide feedback through surveys or questionnaires, to help us and our partners understand your experience and improve our services. Participation is always optional.

By referring businesses to a CDFI we are aiming to improve access to finance for organisations that may benefit from a more relationship-based, inclusive lending approach.

Referral Determination

Responsible Finance will determine the most appropriate Community Development Finance Institution (CDFI) to refer you to. This decision is based not only on your geographic location, but also on our extensive sector knowledge and experience in supporting CDFIs across the UK. We take into account factors such as the type of financial support you may require, the specialisms and capacity of CDFIs in our network, and our understanding of where you are most likely to receive the right support. This ensures that referrals are made fairly, appropriately, and in a way that maximises the likelihood of achieving a positive outcome for you.

What is the lawful basis?

We rely on the lawful basis of **legitimate interest** to process your personal data. We believe this referral to the CDFI is in your interest as an owner or other contact of the referred business with an interest in its success, and the process has been designed to minimise risk to you and uphold your rights. We also rely on our **legitimate interest** to invite you to take part in occasional surveys or feedback exercises. This helps us to understand your experience and improve our services. Participation is always optional, and you may choose not to respond or opt out of future invitations at any time.

You may also be asked for consent by the CDFI before further processing or carrying out eligibility checks.



Who will see your data?

Your data will only be seen by authorised staff at:

- Lloyds Banking Group
- Responsible Finance
- The CDFI

It will **not** be sold or used for marketing purposes without your explicit consent.

How long is your data kept?

Each organisation will only retain your data for as long as necessary, in accordance with their respective retention policies. If your application progresses with the CDFI, they will inform you of their data retention approach separately.

What are your rights?

Under UK data protection law, you have rights including:

- Access to your data
- Correction of inaccurate data
- Objection to processing
- Erasure of your data (in certain circumstances)
- Raising a complaint with the Information Commissioner's Office (<https://ico.org.uk/make-a-complaint/data-protection-complaints/>)

For questions or to exercise your rights, you may contact:

- **Responsible Finance:** info@responsiblefinance.org.uk
- **Lloyds Banking Group:** Ravi.Mehan@LloydsBanking.com
- **Your CDFI contact**