

Aros Kapital Limited UK Privacy Notice

Last updated: July 2024

Aros Kapital Limited is part of the Aros Kapital Group and respects your right to privacy. This Privacy Notice explains who we are, how we collect, share and use personal information about you, and how you can exercise your privacy rights.

This Privacy Notice applies to personal data we collect through our website at <https://aroskapital.co.uk/> ("**Website**") and personal data we process as part of your engagement with us and the services and products we offer ("**Services**").

If you have any questions or concerns about our use of your personal information, then please contact us using the contact details provided at the bottom of this Privacy Notice.

Quick links

We recommend that you read this Privacy Notice in full to ensure you are properly informed. However, if you only want to access a particular section of this Privacy Notice, then you can click on the relevant link below to jump to that section.

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What does Aros Kapital Limited do?

Aros Kapital Limited is part of the Aros Kapital Group and specialises in the provision of finance to small and medium sized companies by lending directly to them and also through provision of financing to other partner funders, who in turn make this type of financing available. We are established in the UK and our parent company, Aros Kapital AB is established in Sweden, with its headquarters in Gothenburg.

For more information about Aros Kapital Limited, please see the ["About Us"] section of our Website at <https://aroskapital.co.uk/>

Personal data we collect and process

The personal data we collect from you, either directly or indirectly, will depend on how you interact with us and our Website. We collect personal information about you from the following different sources:

- *Information that you provide directly*

We collect personal data directly from you when you choose to provide us with this information online and through your other interactions with us. We also collect personal data from you when you engage with us as part of our Services, and in order for us to fulfil our Services, such as information provided as part of your application process for a loan or financial product.

- *Information that we collect indirectly*

When you visit our Website, we may collect certain information automatically from your device. In the UK, this information may be considered personal information under applicable data protection laws. Some of the information we collect indirectly is captured using cookies and other tracking technologies.

Specifically, the information we collect automatically may include information like your IP address, device type, unique device identification numbers, browser-type, broad geographic location (e.g. country or city-level location) and other technical information. We may also collect information about how your device has interacted with our Website, including the pages accessed and links clicked.

Collecting this information enables us to better understand the visitors who come to our Website, where they come from, and what content on our Website is of interest to them. We use this information for our internal analytics purposes and to improve the quality and relevance of our Website to our visitors.

Please see our Cookie Notice for more information <https://aroskapital.co.uk/cookies>

- *Information that we obtain from third party sources*

When we accept you as a client or are considering an application for a borrower, guarantor, security provider, client or associate, we may collect further information about you from third party sources (including credit reference agencies, fraud prevention agencies, insurers, debt brokers and other similar intermediaries, public information sources such as Companies House or Government or law enforcement agencies or information from social media sites which is relevant to your professional activities) but only where we have checked that these third parties either have your consent or are otherwise legally permitted or required to disclose your personal information to us.

The types of information we collect from third parties may vary depending on the service we are offering. They may include your credit and insurance history, and information to verify your identity. We use the information we receive from these third parties to maintain and improve the accuracy of the records we hold about you, to ensure that the products we offer are suitable, and to prevent fraud and money-laundering.

The table below describes the categories of personal data we collect from and about you through our Website and Services.

Personal Data Description	Source
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<p>Contact Data such as your name, email address, phone number, current/previous addresses.</p>	<ul style="list-style-type: none"> • Directly from you • Third parties
<p>Identity Data such as your gender, marital status, nationality, residency status, date of birth, copies of your passport, driving licence, national insurance number or other proof of identity, electoral register information, occupancy and employment status.</p> <p>This may include biometric information, where your identity is verified through use of biometrics.</p>	<ul style="list-style-type: none"> • Directly from you • Third parties
<p>Business Data such as your business name and contact information, information about your directors, partners, members, shareholders, beneficial owners and guarantors.</p>	<ul style="list-style-type: none"> • Directly from you • Third parties
<p>Financial Data such as bank or building society account details and details of debit cards used to make payment to us, your accounts, details of your mortgage including the account number, balance outstanding and cost of service, income and expenditure details, sales records, previous records, previous credit applications and the conduct of your accounts and other management information concerning the performance of your business. Information about the nature of your business and the assets you hold or liabilities you have incurred and any other financial indebtedness or security that you have entered into with third parties; source of wealth and source of funds.</p>	<ul style="list-style-type: none"> • Directly from you • Third parties
<p>Communications Data such as your communications with us (including when you interact with our customer service agents offline), any queries you raise, chat, email or call history. This will include information as to how you contact customer services and the channel of communication that you use or any information that you send to us as part of such communication.</p>	<ul style="list-style-type: none"> • Directly from you
<p>Credit Data such as credit reference checks.</p>	<ul style="list-style-type: none"> • Third parties
<p>Background Check Data such as any fraud prevention information (including personal data relating to political and/or religious affiliations and criminal convictions).</p>	<ul style="list-style-type: none"> • Third parties
<p>Relationship Data such as information about your family members (including your next of kin), dependents and associates.</p>	<ul style="list-style-type: none"> • Directly from you • Third parties
<p>Account Data such as any login information (including mail and password), security questions and profile information.</p>	<ul style="list-style-type: none"> • Directly from you

<p>Device Data collected using tags and pixels, including your IP address, your ISP, and the browser you use to visit our website, device type, unique device identification numbers or other identifiers.</p>	<ul style="list-style-type: none"> • Automatic collection
<p>Website Usage Data such as activity and Website interaction, information that we capture using cookies and similar technologies This will include page views and searches, clicks, operating system, information about content viewed, length of visits to certain pages, and other functional information on Website performance (for example, application version information, diagnostics, and crash logs).</p>	<ul style="list-style-type: none"> • Automatic collection

Some of the personal data we collect about you, such as when we carry out background checks, may reveal personal information which is considered sensitive personal data under UK data protection laws. This can include biometric data, where we or third parties use biometrics to verify your identity. Additionally, this includes where we carry out checks against sanction lists which may reveal information about your political or religious affiliations. We may also obtain information relating to criminal convictions or offences where we carry out a criminal record check.

The provision of this sensitive personal data is necessary for the performance of our contract with you and/or to enter into a contract with you. We may also be required to process this information in compliance with our own legal obligations pursuant to the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 as amended by The Money Laundering and Terrorist Financing (Amendment) Regulations 2019 and the Money Laundering and Transfer of Funds (Information) (Amendment) (EU Exit) Regulations 2019.

If we do not collect this data, then unfortunately we cannot provide our Services to you.

How we use your personal data (our purposes) and our legal basis for processing it

We use the personal data that we collect from and about you only for the purposes described in this Privacy Notice or for purposes that we explain to you at the time we collect your information.

Depending on our purpose for collecting your information, we rely on one of the following legal bases:

- **Contract** - we require certain personal data in order to provide and support the Services you engage with us for;
- **Consent** – in certain circumstances, we may ask for your consent (separately from any contract between us) before we collect, use, or disclose your personal data, in which case you can voluntarily choose to give or deny your consent without any negative consequences to you;
- **Legitimate interests** – we will use or disclose your personal data for the legitimate business interests of either Aros or a third party, but only when we are confident that your privacy rights will remain appropriately protected. If we rely on our (or a third party's) legitimate interests, these interests will normally be to: operate, provide and improve our business, including our Services and Website; communicate with you and respond to your questions; detect or prevent illegal activities (for example, fraud); and/or to manage the

security of our IT infrastructure, and the safety and security of our employees and clients. Where we require your data to pursue our legitimate interests or the legitimate interests of a third party, it will be in a way which is reasonable for you to expect as part of the running of our business and which does not materially affect your rights and freedoms. We have identified below what our legitimate interests are. To obtain information from the associated balancing test please contact us using the contact details provided under the “How to contact us” heading below. [Go to section](#)

- **Legal obligation** – there be instances where we must process and retain your personal data to comply with laws or to fulfil certain legal obligations.

The following table provides more details on our purposes for processing your personal data and the related legal bases. The legal basis under which your personal data is processed will depend on the data concerned and the specific context in which we use it.

Purpose/Activity	Type of personal data	Lawful basis for processing including basis of legitimate interest
To provide you with our Services and manage our relationship during the course of your engagement with us.	Contact Data Identity Data Account Data Correspondence Data Business Data Relationship Data	Performance of a contract
Informing you of changes to our Services, issuing invoices, providing updates, support and other administrative messages.	Contact Data Correspondence Data	Performance of a contract Otherwise, as necessary for our legitimate interests to operate our business and communicate with you where our communications are not necessary to perform or enter into a contract with you.
Developing and improving our Services and business, including analysing and improving our credit risk models and our customer service offering	Business Data	Necessary for our legitimate interests to operate, provide and improve our Services and business.
Ascertaining borrowing needs	Business Data Financial Data	Performance of a contract
Assessing creditworthiness and making credit-related decisions	Financial Data Credit Data Identity Data	Performance of a contract

<p>Where you miss any loan payment or repayment of any other financial product provided by us, we may trace your whereabouts and recovering debts or enforcing a loan contract, security interest or personal guarantee and to verify any payment plan proposed or income and expenditure form submitted.</p>	<p>Contact Data Identity Data Business Data Financial Data Credit Data Relationship Data</p>	<p>Performance of a contract</p> <p>Necessary for our legitimate interests to operate our business.</p> <p>In the case of identity verification, where required by applicable law, in accordance with our legal obligations.</p>
<p>To transfer money as part of the Services</p>	<p>Contact Data Business Data Financial Data</p>	<p>Performance of a contract</p>
<p>To carry out mandatory or other regulatory checks</p>	<p>Contact Data Identity Data Business Data Financial Data Credit Data Background Check Data</p>	<p>Compliance with a legal obligation to which we are subject.</p> <p>To the extent that such personal data includes sensitive personal data we carry out such processing for where processing is necessary for the purposes of the prevention or detecting of an unlawful act; or where the processing is necessary for the purposes of complying with, or assisting other persons to comply with a regulatory requirement.</p>
<p>Complying with our legal and regulatory obligations</p>	<p>Contact Data Identity Data Business Data Correspondence Data Financial Data Credit Data Background Check Data</p>	<p>Compliance with a legal obligation to which we are subject.</p> <p>To the extent that such personal data includes sensitive personal data we carry out such processing for where processing is necessary for the purposes of the prevention or detecting of an unlawful act; or where the processing is necessary for the purposes of complying with, or assisting other persons to comply with a regulatory requirement.</p>

<p>To carry out statistical analysis, market research and testing</p>	<p>Contact Data Identity Data Business Data Correspondence Data Financial Data Credit Data Background Check</p>	<p>Our legitimate interests to improve our Services and business.</p>
<p>To contact you (including by SMS and e-mail) with products and services which we think may interest you (at all times taking into consideration your rights at law including your right to opt-out from receiving marketing</p>	<p>Contact Data Business Data</p>	<p>Consent (where required under applicable law). Otherwise, as necessary for our legitimate interests to promote our Services and business.</p>
<p>To verify your identity and the other information you have provided to us, including your bank account information and (if relevant) the identity of your business associates</p>	<p>Identity Data Business Data Financial Data Credit Data Background Check Data</p>	<p>Performance of a contract and where applicable as required under a legal obligation to which we are subject. To the extent that such personal data includes sensitive personal data we carry out such processing for where processing is necessary for the purposes of the prevention or detecting of an unlawful act; or where the processing is necessary for the purposes of complying with, or assisting other persons to comply with a regulatory requirement. To the extent that such personal</p>
<p>For the prevention and detection of fraud, money laundering, or other illegal or criminal activity</p>	<p>Background Check Data</p>	<p>For the purposes of the prevention or detecting of an unlawful act; or where the processing is necessary for the purposes of complying with, or assisting other persons to comply with a regulatory requirement.</p>

To protect our legal rights (including where necessary, to share information with law enforcement and others), for example, to defend claims against us and to conduct litigation to defend our interests.	Identity Data Contact Data Business Data Communications Data Financial Data Credit Data	Our legitimate interests to protect our business interests.
To administer and maintain our Website and our IT systems	Device Data Website Usage Data Account Data	Our legitimate interests to operate our business and to detect or prevent illegal activities on
Manage our use of tracking technologies such as cookies (including enabling you to manage your cookie preferences) and analyse collected data to learn about our Website, to improve our Website. This includes website analytics, identifying browsing trends and identifying this on an aggregated and individual	Device Data Website Usage Data	Consent (where required under applicable law) Otherwise (for strictly necessary cookies) our legitimate interests to operate, provide and improve our Website and to use insights to improve or develop marketing activities and promote our business and Services.

Who does Aros Kapital Limited share my personal information with?

We may disclose your personal information to the following categories of recipients:

- to our **group company (Aros Kapital AB)**, as we are part of the Aros Kapital Group and who may process personal data for purposes described in this Privacy Notice.
- to any **third party services providers and partners** who provide data processing services to us as necessary to provide you with our Services and Website or who otherwise process personal information for purposes that are described in this Privacy Notice or notified to you when we collect your personal information. The following table list the main third party service providers we engage to process your personal data, the categories they provide and the types of personal data they receive in order to provide us these services:

Service Provider	Services	Personal data
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<p>LexisNexis Risk Management Solutions and LexisNexis Bridger Insight https://risk.lexisnexis.com/corporate/privacy-policy Please see their Privacy Notice for more information on how they process your personal data and to contact them directly with respect to their processing</p>	<p>Customer (borrower) KYC screening (including AML, sanctions, PEPs, adverse media and enforcement checks)</p>	<p>Contact Data Identity Data</p>
<p>Experian (Business IQ and ID HUB) https://www.experian.co.uk/privacy/bi-data-privacy-policy Please see their Privacy Notice for more information on how they process your personal data and to contact them directly with respect to their processing</p>	<p>Customer credit checking (including alerts related to a wide range of risk events such as adverse information, changes in shareholders/directors, bankruptcy, serious adverse information notification and verification of bank account(s) (or account that will be used for loan transactions) of a borrower</p>	<p>Contact Data Identity Data</p>

- to any **third party services** when you use a third party service linked through our Website, your personal data will be collected by the provider of such services. Please note that when you use third party services, their own terms and privacy notices will govern your use of their services.
- to any **competent law enforcement body, regulatory, government agency, court or other third party** (such as our professional advisers) where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person;
- to an actual or **potential buyer** (and its agents and advisers) in connection with any actual or proposed purchase, merger or acquisition of any part of our business, including the transfer or sale of any loan or other financial product, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Privacy Notice;
- (if we are unable to provide a loan or other financial product and if you consent), to third parties who may be in a position to arrange credit;
- to any **other person with your consent** to the disclosure.

How does Aros Kapital Limited keep my personal data secure?

We use appropriate technical and organisational measures (TOMs) to protect the personal data that we collect and process about you. The measures that we have implemented are designed to provide a level of security appropriate to the risk of processing your personal data but involve ensuring the confidentiality, integrity, availability and traceability of data. Our TOMs are updated from time to time but a copy of our current TOMs can be provided on request.

International data transfers

We aim to keep your data in the UK and the European Economic Area. In some situations, your personal information may be transferred to and processed in countries outside the UK or the European Economic Area by our third party service providers and partners. It is important to us to protect your personal information. We therefore take all appropriate legal, technical and organisational measures to ensure that your personal information is kept safe. We ensure that appropriate security measures are taken which are comparable to and of the same standard as the protections afforded to individuals in the UK and the European Economic Area.

Data retention

We retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).

In certain circumstances, we will need to keep your information for legal reasons after our contractual relationship has ended. The specific retention periods will depend on the nature of the information we collect and why it is collected and processed and the nature of the legal requirement. Specific retention periods are more fully described in our data retention policy and our Article. 30 register.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

Automated processing

We make very limited use of automatic processing of your data in the provision of our services to you. Examples of some automated processing that we may undertake include:

- Identify verification, anti-money laundering and sanctions checks.
- Screening of individuals who may be classed as “Politically Exposed Persons”.
- Transaction monitoring for the purposes of preventing fraud and other forms of financial crime.

In all instances this automated processing does not lead to automated decision making: the outcomes of the automated processing are reviewed by a human being who will make any necessary decisions.

Your data protection rights

You have the following data protection rights:

- If you wish to **access, correct, update or request deletion** of your personal information, you can do so at any time by contacting us using the contact details provided under the “How to contact us” heading below. [Go to section](#).

- In addition, you can **object to processing** of your personal information, ask us to **restrict processing** of your personal information or **request portability** of your personal information. Again, you can exercise these rights by contacting us using the contact details provided under the “How to contact us” heading below. [Go to section.](#)
- You have the right to **opt-out of marketing communications** we send you at any time. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing e-mails we send you. To opt-out of other forms of marketing (such as postal marketing or telemarketing), then please contact us using the contact details provided under the “How to contact us” heading below. [Go to section.](#)
- Similarly, if we have collected and process your personal information with your consent, then you can **withdraw your consent** at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- You have the **right to complain to a data protection authority** about our collection and use of your personal information. For more information, please contact your local data protection authority.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

Updates to this Privacy Notice

We may update this Privacy Notice from time to time in response to changing legal, technical or business developments. When we update our Privacy Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make.

You can see when this Privacy Notice was last updated by checking the “last updated” date displayed at the top of this Privacy Notice.

How to contact us

If you have any questions or concerns about our use of your personal information, please contact us using the following details: dpo@aroskapital.co.uk or by post at DPO, Third Floor, 8 Pollen Street, W1S 1NG, London.

The data controller of your personal information is Aros Kapital Limited.