Privacy Policy

Churchbridge Capital Limited
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Privacy Policy

1. Who We Are

1.1 Churchbridge Capital Limited ("Churchbridge", "we", "us" or "our") is a commercial finance broker incorporated in England and Wales with company number 16950432, whose registered office is at 51 Marloes Road, London, W8 6LA.

1.2 Churchbridge is an Appointed Representative (FRN 1050860) of WSP Capital Ltd (FRN 1040612), which is authorised and regulated by the Financial Conduct Authority.

1.3 Churchbridge is registered with the Information Commissioner's Office as a data controller under registration number ZC084857. This policy explains how we use your personal data and the rights available to you in relation to it.

1.4 If you have any question about this policy, or wish to exercise any of your rights, please contact us by email at georgew@churchbridgecapital.com or by post at Churchbridge Capital Limited, 51 Marloes Road, London, W8 6LA.

2. Personal Data We Collect

2.1 Depending on the nature of your relationship with us, we may collect and process the following categories of personal data:

(a) identity data, including your full name, date of birth, nationality and photographic identification documents;

(b) contact data, including your home or business address, email address and telephone numbers;

(c) financial data, including your income, assets, liabilities, credit history (including any adverse credit history), bank details and source of funds;

(d) business data, including details of company ownership and directorships where you are a business owner;

(e) transactional data, including details of finance enquiries, applications and completed transactions;

(f) verification data, including identity, sanctions and politically exposed person screening records and anti-money laundering records collected under our legal obligations;

(g) criminal offence data, being information about criminal convictions and offences that you disclose to us in an application;

(h) communication data, including records of emails, calls and other correspondence between us; and

(i) technical data, including your IP address and information about your device and browser, which is collected when you use the forms on our website. Information about cookies and similar technologies is set out in our Cookies Policy.

2.2 Save for the criminal offence data described in clause 5, we do not routinely collect sensitive personal data. Where such information is shared with us incidentally, we will handle it with particular care and use it only to the extent necessary.

2.3 Where you are a director, shareholder, beneficial owner, guarantor or other person connected with a borrower, we may obtain your personal data from that borrower or its representatives, from the intermediary who introduced the borrower to us, from identity verification and screening providers, and from public registers such as Companies House and HM Land Registry. When the company look-up on our website is used, the company name or number entered is sent to Companies House in order to retrieve information from its public register.

2.4 The provision of the personal data we request is necessary for us to act for you and to comply with our legal obligations, including those under the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017. If that personal data is not provided, we will be unable to act for you or to introduce your application to a lender.

3. Who We Share Your Data With

3.1 Where necessary, we may share your personal data with:

(a) lenders, in order to submit your application and to negotiate finance terms on your behalf;

(b) WSP Capital Ltd, as our principal firm, for regulatory oversight purposes;

(c) professional advisers, including solicitors, surveyors and accountants involved in your transaction;

(d) identity verification providers, which carry out know-your-customer and anti-money laundering screening;

(e) service providers that process personal data on our behalf, being Hostinger, which hosts our website and processes the forms submitted through it, Microsoft, which provides our email through Microsoft 365, and Cloudflare, which protects our website forms against spam and automated misuse; and

(f) regulatory and law enforcement bodies, including the Financial Conduct Authority, the National Crime Agency and the Information Commissioner's Office, where we are required by law to do so.

3.2 We do not sell your personal data, and we do not share it with any third party for marketing purposes without your consent.

4. Why We Use Your Data

4.1 We use your personal data for the purposes, and on the legal bases, set out below:

Purpose	Legal basis	UK GDPR Article
Arranging and managing finance transactions on your behalf	Contract	Article 6(1)(b)
Verifying your identity and carrying out anti-money laundering and know-your-customer checks	Legal obligation	Article 6(1)(c)
Complying with FCA regulatory requirements and reporting	Legal obligation	Article 6(1)(c)
Handling complaints and resolving disputes	Legal obligation and legitimate interests	Articles 6(1)(c) and 6(1)(f)
Maintaining our business records and accounts	Legitimate interests	Article 6(1)(f)
Protecting our website and its forms against spam and misuse	Legitimate interests	Article 6(1)(f)
Sending you information about our services, where you have consented	Consent	Article 6(1)(a)

4.2 Personal data that we receive from you for the purposes of the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 will be processed only for the purposes of preventing money laundering, terrorist financing or proliferation financing, or as otherwise permitted by those Regulations.

5. Criminal Offence Data

5.1 Where you disclose information about criminal convictions or offences in an application, we process that information only where it is necessary for the prevention or detection of unlawful acts, including fraud and money laundering, in accordance with Article 10 of the UK GDPR, section 10(5) of the Data Protection Act 2018 and paragraph 10 of Schedule 1 to that Act.

5.2 Access to criminal offence data is restricted to those who need it for that purpose. We may disclose it to a lender to which we submit your application, and we retain it only for the periods set out in clause 7.

6. International Transfers

6.1 Some of our service providers, including Microsoft and Cloudflare, may process your personal data outside the United Kingdom. Where they do so, the transfer is made to a country that is the subject of UK adequacy regulations or is protected by appropriate safeguards under the UK GDPR, such as the International Data Transfer Agreement or the International Data Transfer Addendum to the European Commission's standard contractual clauses. Further information about these safeguards is available on request.

7. How Long We Keep Your Data

7.1 We retain personal data for the periods set out below:

Category of data	Retention period
Client and transaction records, including applications that proceed to completion	Six years from completion of the transaction
Identity verification (anti-money laundering and know-your-customer) records	Five years from the end of the business relationship, after which they are deleted unless the law requires or permits us to retain them
Complaint records	Three years from the date of receipt
Marketing consent records	Until consent is withdrawn, and for three years thereafter
Unsuccessful enquiries and applications, including enquiry emails and online application forms that do not proceed	Two years from the date of the enquiry or application

8. Your Rights

8.1 Under the UK General Data Protection Regulation, you have the following rights in relation to your personal data:

(a) the right of access, to request a copy of the personal data we hold about you;

(b) the right to rectification, to ask us to correct inaccurate or incomplete data;

(c) the right to erasure, to ask us to delete your data where it is no longer needed, subject to our legal retention obligations;

(d) the right to restriction, to ask us to pause the processing of your data in certain circumstances;

(e) the right to data portability, to request your data in a portable format where processing is based on consent or contract; and

(f) the right to object to processing based on legitimate interests, and to direct marketing at any time.

8.2 Where we process your personal data on the basis of your consent, you may withdraw that consent at any time. The withdrawal of consent does not affect the lawfulness of any processing carried out before it was withdrawn.

8.3 To exercise any of these rights, please contact us using the details set out in clause 1.4. We will respond within one calendar month, and no charge will be made.

9. Complaints

9.1 If you are dissatisfied with the way in which we have handled your personal data, you have the right to complain to the Information Commissioner's Office at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, by telephone on 0303 123 1113, or through its website at www.ico.org.uk.

9.2 We would, however, welcome the opportunity to address your concern directly before you contact the Information Commissioner's Office.

10. Changes to This Policy

10.1 We may update this policy from time to time. The current version is available on request and on our website. Where we hold your contact details, we will notify you of any material change.

10.2 This policy is provided for information purposes only.