

Gemstone Legal Privacy Notice

Who we are:

We are **Gemstone Legal** and we can be contacted using the following details:

- Telephone Number: 07785 503 007
- Address: Our registered office is at Abbey House, 51 High Street, Saffron Walden, Essex, CB10 1AF]
- Email address: info@gemstonelegal.co.uk
- Data Protection Officer/ contact: Paul McCluskey
- ICO Registration Number: ZA791611

Our legal grounds for holding your data:

The UK's data protection laws allow us to use your personal data provided we have a lawful basis to do so. This includes sharing it in certain circumstances, as described below.

We consider we have the following reasons (legal bases) to use your personal data:

- Performance of contract with you: we need to use your personal data to be able to successfully legally contract with you.
- Compliance with our legal obligations: we need to use your personal data so as to comply with certain legislation such as financial crime legislation.
- Legitimate interests: these are our business and commercial reasons for using your data, which we have balanced against your interests. We have certain legitimate interests in using your data which are not outweighed by your interests, fundamental rights or freedoms. These legitimate interests are to help prevent and detect financial crime, fraud and money laundering, to promote responsible lending, to support our tracing, collection and litigation procedures and to assist our compliance with the legal and regulatory requirements placed upon us.
- Your consent: You can withdraw this consent at any time, in which case we will cease to use it, unless we have a right and a need to continue processing it for one of the other reasons set out above.

More information on how we use your personal data and for what purposes is set out below.

What data do we collect?

Data provided by you:

Funder application details: for example but not limited to:

- a) your name,
- b) national insurance number,
- c) postal address,
- d) your email address,
- e) telephone numbers,
- f) date of birth,
- g) bank account details,
- h) equipment requirement details,
- i) home ownership details,
- j) reason for borrowing,
- k) your assets and liabilities,
- l) details of your proof of identity documentation,
- m) proof of address documentation, evidence of additional equity available and evidence of any other business interests

When you talk to us: for example on the phone, or in person including call recordings and voice messages. We may monitor or record calls with you to check we have carried out your instructions, to resolve queries or disputes, to improve the quality of our service or for regulatory or fraud prevention purposes:

- **In writing:** for example letters, emails, texts and other electronic communications
- **Online:** for example when you use our website or mobile app
- **In financial reviews:** for renewals and in any surveys etc

Data we collect when you use our services?

- a) Transaction data: for example what sort of products you are selecting, the length of term, the types of asset you are looking at financing, business type and geographical location
- b) Payment data: for example, the amount, origin, frequency, history and method of your payments
- c) Usage and profile data: for example, the profile you create to use our website and mobile app and how you use it. We gather this data from the devices you use, using cookies and other software
- d) Register online or other communication methods for our services.
- e) Voluntarily complete a customer survey or provide feedback on any of our message boards or via email.
- f) Use or view our website via your browser's cookies.

Data provided to and by third parties

Data from persons that introduce you to us: for example brokers, product suppliers, financial advisers, agents, finance providers or other third parties

- a) Data from credit reference agencies, most likely to be either Experian, Creditsafe, Equifax or CallCredit
- b) Data from fraud prevention agencies
- c) Publicly available information: for example, from the land registry, companies house, the electoral register, other information available online or in the media, including social media

****We may also require a statement signed by an independent qualified accountant as to your financial worth which may include information such as your gross and net worth, your assets and liabilities and information as to your available collateral or security. You will be asked to consent to the provision of this information.**

Special Category Data

In the course of your interactions with Gemstone Legal you may share information that is classified as 'Special Category Data'. This could include data about:

- a) Race
- b) Ethnic origin
- c) Politics
- d) Religion
- e) Trade union membership
- f) Genetics
- g) Biometrics
- h) Health
- i) Sex life
- j) Sexual orientation

Where you do share information relating to any of these categories e.g., when you may share information about your health or a characteristic of vulnerability Gemstone Legal will always seek explicit consent from you to store and process such information.

Why is personal data collected by us

Gemstone Legal collects personal data for a number of reasons

From time to time, we may contact you to ask for your consent to use your personal data for other purposes. Your personal data may also be used for other purposes where required or permitted by law.

When we and fraud prevention agencies process your personal data, we do so on the basis that we have a legitimate interest in preventing fraud and money laundering, and to verify identity, in order to protect our business and to comply with laws that apply to us. Such processing is also a contractual requirement of the services or financing you have requested. We, and fraud prevention agencies, may also enable law enforcement agencies to access and use your personal data to detect, investigate and prevent crime. Fraud prevention agencies can hold your personal data for different periods of time, and if you are considered to pose a fraud or money laundering risk, your data can be held for up to six years.

In order to process your application, we may supply your personal information to credit reference agencies (CRAs) in which case they will give us information about you, such as about your financial history. We do this to assess your creditworthiness and product suitability, check your identity, manage your account, trace and recover debts and prevent criminal activity. When CRAs

receive a search from us they may place a search footprint on your credit file that may be seen by other lenders and used to assess applications for finance from you and members of your household. The CRA may also share your personal information with other organisations. We may 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. Your data will also be linked to the data of your spouse, any joint applicants or other financial associates. We can provide you with the identities of the CRAs and the ways in which they use and share personal information upon your request.

From time to time, we may provide your information to our partners, third parties and customer service agencies for research and analysis purposes so that we can monitor and improve the services (or as the case may be) we provide. We may contact you by post, e-mail or telephone (or as required) to ask you for your feedback and comments on our services (or as the case may be). We may also contact you about our other goods or services that may be of interest to you (delete if not applicable).

How will we use your data?

Our Company collects your data so that we can:

- 1) Process your application and manage your request.
- 2) Email you with special offers on other products and services we think you might like.
- 3) To monitor the performance of our products and services to ensure consumer outcomes are being achieved

Lawful Basis for Processing Data

Data Type	Lawful Basis for Processing
Personal details	Identifying individuals
Employment Details	Verifying finance affordability
Financial Details	Verifying finance affordability
Spouse details	Understand household income
Other financial Loans	Understand financial liabilities

When Personal Data is shared

Your personal data may be used by our partners, lenders, brokers, agents, sub-contractors, lawyers and by any of our or their subsidiary or associated companies before, during and after your agreement facilitated by us. We may also use organisations to perform tasks on our behalf including information technology service providers, repossession agents, banks and transportation companies who we will then be sharing your personal data with and who may also process and retain your data both before, during and after your agreement facilitated by us. Any of these third parties may contact you by post, e-mail or telephone (or as required).

We may also share your personal data with CRAs, fraud prevention agencies, law enforcement agencies, regulators and other authorities, the UK Financial Services Compensation Scheme, any agent that you have given us authority to communicate with and persons you ask us to share your data with, companies that we introduce you to, market researchers tracing and debt recovery agencies and customer service agencies for the purposes set out above. These agencies and firms may also share your personal data with others.

Your personal data may also appear on the V5, service history, manufacturers record, insurance documentation or within receipts in relation to the asset which may be shared by us with third parties who store, transport, advertise, sell, express interest in purchasing, own or later hire the asset.

If, in the future, we sell, transfer or merge all or part of our business or assets, including the acquisition of other businesses, we may share your data with other parties. We will only do this if they agree to keep it safe and private and to only use it in the same ways as set out in this notice.

What are your data protection rights and choices?

Your personal data is protected by legal rights, which include:

- a) **Right to be informed** – Individuals have the right to be informed about the collection and use of their personal data
- b) **The right of access** to your personal data – Individuals have the right to access and receive a copy of their personal data and other supplementary information.
- c) **The right to rectification**- Individuals have the right to have inaccurate personal data rectified or completed if incomplete.
- d) **The right to erasure** – Individuals have the right to have their personal data erased.

- e) **The right to restrict processing** – Individuals have the right to request the restriction or suppression of their personal data.
- f) **The right to portability** – This allows individuals to obtain and reuse their personal data for their own purposes across different services.
- g) **The right to object** – this gives individuals the right to object to the processing of their personal data in certain circumstances, it also gives individuals the absolute right to stop their data being used for direct marketing
- h) **The right in relation to automated decision making and profiling** – this allows individuals to object to their data being used in an automated individual decision-making process (making a decision solely by automated means without any human involvement) and profiling (automated processing of personal data to evaluate certain things about an individual). Profiling can be part of an automated decision-making process.

There may be reasons why we need to keep or use your data, but please tell us if you think we should not be processing your data.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us at our email info@gemstonelegal.co.uk

For further information on how your information is used, how we maintain the security of your information and your rights in relation to it, please contact us via email info@gemstonelegal.co.uk or call us on **07785 503 007**

How long is your data kept

We will retain your personal data as long as you are a customer with us. We may retain your personal data beyond this date for the purposes mentioned above and will in any case at all times retain your personal data for the minimum period required by law. We may also retain your data to deal with any disputes, to maintain records and to show we have dealt with you fairly.

We may also retain your data for research and statistical purposes in which case we will ensure it is kept private and used only for these purposes.

Data about live and settled accounts is kept on credit files for six years from the date they're settled or closed. If the account is recorded as defaulted, the data is kept for six years from the date of the default.

Marketing

Gemstone Legal understands that with the introduction of the Consumer Duty, it is likely the level of communications issued by our business will increase. This will be necessary to support customers to understand the products and services offered and to provide support to customer throughout the lifecycle of the relationship.

Our Company would like to send you information about products and services of ours that we think you might like. If you have agreed to receive marketing, you may always opt out at a later date.

You have the right at any time to stop Gemstone Legal from contacting you for marketing purposes or giving your data.

Cookies

Gemstone Legal does not use cookies to track and test customer engagement and actions throughout the customer journey or customer communications. Gemstone Legal understand that under the Privacy and Electronic Communications Regulation ([PECR](#)) opt-in consent is required when these types of cookies are used.

Cookies are text files placed on your computer to collect standard Internet log information and visitor behaviour information. When you visit our websites, we may collect information from you automatically through cookies or similar technology.

For further information, visit www.allaboutcookies.org].

How do we use cookies?

Our Company uses cookies in a range of ways to improve your experience on our website.

What types of cookies do we use?

There are a number of different types of cookies, however, our website uses:

Functionality – Our Company uses these cookies so that we recognize you on our website and remember your previously selected preferences. These could include what language you prefer and location you are in. A mix of first-party and third-party cookies are used.

Advertising – Our Company uses these cookies to collect information about your visit to our website, the content you viewed, the links you followed and information about your browser, device, and your IP address. Our Company sometimes shares some limited aspects of this data with third parties for advertising purposes. We may also share online data collected through cookies with our advertising partners. This means that when you visit another website, you may be shown advertising based on your browsing patterns on our website.

Cookie Key	Domain	Cookie Type	Expiration	Description
ssr-caching	www.gemstonelegal.co.uk	First-party	12 seconds	Indicates how a site was rendered
XSRF-TOKEN	www.gemstonelegal.co.uk	First-party	Session	This cookie is written to help with site security in preventing Cross-Site Request Forgery attacks.
hs	www.gemstonelegal.co.uk	First-party	Session	Used for security reasons
cf_bm	.hubspot.com	Third-party	29 minutes 53 seconds	This cookie is used to distinguish between humans and bots. This is beneficial for the website, in order to make valid reports on the use of their website.
svSession	www.gemstonelegal.co.uk	First-party	1 year 1 month	Identifies unique visitors and tracks a visitor's sessions on a site
cfuid	.hubspot.com	Third-party	Session	This cookie is used for purposes of tracking users across sessions to optimize user experience by maintaining session consistency and providing personalized services.

First-party

How to manage cookies

You can set your browser not to accept cookies, and the above website tells you how to remove cookies from your browser. However, in a few cases, some of our website features may not function as a result.

Changes to our privacy policy

Our Company keeps its privacy policy under regular review and places any updates on this web page. This privacy policy was last updated on 29th October 2025

How to contact us

If you have any questions about Our Company's Privacy Policy, the data we hold on you, or you would like to exercise one of your data protections rights, please do not hesitate to contact us in the follow way:

- a) Contact: Paul McCluskey
- b) Email us at: info@gemstonelegal.co.uk
- c) Call us: 07785 503 007

How to make a complaint and contact the appropriate authority

If you are unhappy about how your personal data has been used by us, please contact us and we will be happy to register a complaint.

You also have a right to complain to the Information Commissioner's Office which regulates the processing of personal data. You can contact them at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, on 0303 123 1113 or by email to casework@ico.org.uk. See also <https://ico.org.uk/global/contact-us/>.