

# Initial Disclosure Document

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## **Who we are**

EFT Finance Limited is an independent credit broker, not a lender, and has commercial relationships with a range of lenders. We can introduce you to one of the lenders we work with, based on factors such as your financial position and the type of credit you need. Please consider alternative finance options before entering into a credit agreement.

EFT Finance Limited is authorized and regulated by the Financial Conduct Authority, Registration No. 667290. The Financial Conduct Authority does not regulate all our credit broking activities. Please ask your EFT Finance Limited contact for any further information.

EFT Finance Limited Company Registration Number 07215828. Registered office: Solo House, The Courtyard, London Road, Horsham, West Sussex, RH12 1AT. Main trading address: Milnwood, 13 North Parade, Horsham, West Sussex, RH12 2BT.

## **Commission Arrangements**

EFT Finance Limited do not charge you a fee for our services. If you sign a credit agreement with the lender we introduce you to, the lender will pay EFT Finance Limited a commission for our work.

The commission will be a percentage of the amount borrowed or the asset cost. This commission affects the amount you pay under your agreement. Before you sign, the lender will tell you how much commission they will pay us, either in a commission disclosure document or in the agreement. They will also explain how the commission amount was calculated.

If you have any questions, please ask your contact at EFT Finance Limited.

## Privacy Policy

This privacy policy explains how we and potential lenders use the personal information we ask you to provide. Please distribute this document to all directors and partners (where applicable). Carefully read this policy and if you have any questions, contact us on [compliance@eftfinance.co.uk](mailto:compliance@eftfinance.co.uk). By sending us the information we have requested, we understand that you have read and are happy with EFT Finance Limited processing your personal data.

Our legal basis for processing your information, under the UK's data protection laws, is the **Legitimate Interests** basis. You provide us with your information so that we may find suitable financing for your needs.

We may ask if you have any personal circumstances which may affect your financial journey. Any information you give us and the lender(s) will help us support you better. We would need your **Consent** to record this information and to pass it onto any potential lender we contact for you. If you prefer to tell the lender directly, we will be happy to let you know the lender's contact details.

We may also use the data you give us or that we get from a specialist data broking service, to send you direct marketing about our finance broking services. Our legal basis for direct marketing is **legitimate interests**.

### What information we may need from you

The following are examples of the information we may ask you to provide:

- Your full name and home address
- Your date of birth
- A copy of your passport
- A copy of your driving licence
- A recent utility bill detailing your home address
- Details of your personal means and liabilities
- Any additional support you may need

### Information from other sources

We may also obtain information from other sources, for example:

- Companies House
- Your website and social media
- Specialist provider of company credit analysis
- Specialist provider of data broking services
- Government sites such as VOSA

### **How we will use your information**

We use Customer Relationship Management tools ([CRM's](#)) to record, for example: your contact details, details of any promotional material you may have received and if you tell us that you do not want to get any more promotion material from us.

Some of our Appointed Representatives record telephone calls. For further information, please ask your EFT Finance contact.

We will pass your information on to potential lender(s). Please contact either our Data Protection Officer on [compliance@eftfinance.co.uk](mailto:compliance@eftfinance.co.uk) or your usual EFT Finance Limited contact, if you would like to know all the potential lenders we approached on your behalf. EFT Finance Limited strongly recommends that you review the Privacy Policy notices on the websites of any lenders approached on your behalf.

We will never sell your information to third parties for marketing purposes.

Potential lenders:

To process your application, the potential lender(s) will perform credit and identity checks (also called a 'search') on you and your business partners. They will send the information on your application to one or more Credit Reference Agency ([CRA](#)). The potential lender will then use the information provided by the [CRA's](#) to check the data you have provided, assess your creditworthiness and if necessary, prevent criminal activity.

In their data protection notices, potential lenders will state if they use automated credit assessment and decision making or use personal data for marketing and related activities. You have a right to ask any lender(s) approached on your behalf to manually review any automated decision and you have the right to object to your information being processed by the lender for marketing or marketing related activities.

Credit Reference Agencies ([CRA's](#)):

[CRA's](#) will record the information about you, your business and its proprietors that they receive from the potential lenders. When the [CRA](#) receives a search from a potential lender, they place a footprint on your credit file which may be seen by other lenders. The [CRA's](#) may supply the potential lender with both public (including electoral register) and shared credit, financial situation and financial history information and fraud prevention information.

If you are a director, the potential lender may seek confirmation, from [CRA's](#), that the residential address you provide is the same as that shown on the restricted register of directors' usual addresses at Companies House. The potential lender may search all directors as individuals as well as in their role as directors / guarantors.

If you are making a joint application or you tell us that you have a spouse or financial associate, you must discuss your credit requirements with them before we send the application to a lender, as the [CRA's](#) may link your records together.

If you borrow from a lender, the details of your accounts and how you manage it/them will be passed by the lender to [CRA's](#). If you borrow and do not repay in full and on time, [CRA's](#) will record the outstanding debt and may supply this information to other organizations or Fraud Prevention Agencies ([FPA's](#)) who may perform similar checks to trace your whereabouts and recover debts that you owe. This information remains on the [CRA's](#) record of you, for 6 years after your credit agreement has ended, whether repaid in full or failed to repay.

If you provide false or inaccurate information and there is any suspicion of fraud, [CRA's](#) will record this and may also pass this information to [FPA's](#) and other organizations. If your request for funding is declined by a lender, the decline may be recorded on your credit record.

Finance companies use different [CRA's](#) and 3 of the [CRA's](#) are listed below. You can get details about these [CRA's](#) and their data protection policies from the below addresses which will take you to the same Credit Reference Agency Information Notice ([CRAIN](#)) document. If you wish to know which [CRA](#) has been contacted by a lender, please ask us and we will find out for you.

- TransUnion (previously called Callcredit Limited):  
[www.transunion.co.uk/legal/privacy-centre?#pc-credit-reference](http://www.transunion.co.uk/legal/privacy-centre?#pc-credit-reference)
- Equifax Limited: [www.equifax.co.uk/privacy-hub/crain](http://www.equifax.co.uk/privacy-hub/crain)
- Experian Limited: [www.experian.co.uk/crain](http://www.experian.co.uk/crain)

The information held by the [CRA's](#) in the UK may not be the same. If you wish to contact any of the [CRA's](#), it is worth considering contacting them all.

- TransUnion (previously Callcredit Limited) – Consumer Services Team – 0330 024 7574 [UKConsumer@transunion.com](mailto:UKConsumer@transunion.com)
- Equifax Limited – [www.equifax.co.uk/Contact-us/Contact\\_Us\\_Personal\\_Solutions](http://www.equifax.co.uk/Contact-us/Contact_Us_Personal_Solutions)
- Experian Limited – <https://ins.experian.co.uk/contact>

## **Direct Marketing**

Where you receive direct marketing communication from us, we will give you the opportunity to opt-out of receiving further direct marketing from us.

We check the information obtained from a specialist data broker against the Telephone Preference Service and Corporate Telephone Preference Service registers and our Do Not Contact list.

You have the right to object to the processing of your information for direct marketing purposes.

## **How long we store your information**

We store your information in our live systems for 6 years from the end of our contact with you or the end of your last credit agreement, whichever is longer. We keep any information we get from a specialist data broker for 2 years in our live systems, unless you become a customer.

We also store your information in encrypted back-ups. The back-ups are stored in a secure off-site location and will only be accessed for business continuity purposes. Information is deleted from the back-ups 10 years after the last processing of your information. It is not currently technically possible to delete individual records from the encrypted back-ups.

## **Your information security**

We take steps to protect your personal data against loss or theft, unauthorized access / disclosure / copying / use or alteration.

## **Access to your information and correction**

You have the right to request a copy of the information that we hold about you. If you would like a copy of some or all your personal information, please contact us:

- by email: [compliance@effinance.co.uk](mailto:compliance@effinance.co.uk)
- by post: EFT Finance Limited, Milnwood, 13 North Parade, Horsham, West Sussex, RH12 2BT

You have the right to ask us to update, correct or remove information you think is inaccurate or incomplete. Where you ask for changes to the information we have, we will also tell any lenders who hold your information. When your finance period ends or if you do not sign a credit agreement, you may ask us to delete your personal information.

## **Your right to erasure**

If you ask us to delete your information, we will remove your information from our live systems within one month of receiving a valid request. Our back-ups will only be accessed for emergency business recovery situations. Due to the way information is stored in encrypted back-ups, it is not possible to delete your information from our back-ups as quickly as from our live systems. We are committed to the deletion of individual encrypted information held in back-ups if, and when, this becomes possible.

## **Your right to object (legitimate basis processing only)**

You can tell us to stop processing your information. We will stop processing your application for credit, unless there are legitimate reasons to continue, for example: the exercise or defence of legal claims.

## **Your right to withdraw Consent**

You can withdraw your consent for our processing of your information regarding any

additional support needs you may have. We will continue to process your application for credit without the additional information. We will also advise any lender we have sent your credit application, that you have decided to withdraw your consent.

### **Your right to complain**

If you wish to complain about how we process your personal information, please let us know on the above contact details. You can also complain to the Information Commissioner's Office:

[ICO](#),  
Wycliffe House,  
Water Lane,  
Wilmslow,  
SK9 5AF.

Telephone helpline: 0303 123 1113

Website: <https://ico.org.uk/make-a-complaint/data-protection-complaints/>

### **Changes to our privacy policy**

This privacy policy was last updated 18 May 2026. We keep our privacy policy under review and will place any updates on our website [www.eftfinance.co.uk](http://www.eftfinance.co.uk).

## **Complaints Policy**

EFT Finance Limited aim to provide all our customers with the best levels of customer service and we will always want to hear when you feel that any service or product does not meet your satisfaction. You can let us know using any method e.g., verbally, by email, text or post. Please give us as much information as possible so that we can investigate your complaint.

### **Our Complaints Process:**

When you have sent us as much information as possible, we will send you a letter to confirm that we have received your complaint and we will confirm our understanding your complaint. If you feel that we have not understood your complaint, please let us

know.

If your complaint may be covered by the Financial Ombudsman Service (an '[eligible complaint](#)'), we will send you a copy of their leaflet. We will then investigate your complaint.

## **Complaints about finance providers**

If you complain to us about a finance provider, we will check that we have all the details of your complaint and will then pass them onto the finance provider, who will follow their own complaints process and contact directly to you.

## **Timescales**

If your complaint is about EFT Finance Limited and the Complaints Director can resolve your complaint within 3 working days, a Summary Resolution Communication will be sent to you which will include the following information:

- A summary of the complaint and the resolution.
- A statement that EFT Finance Limited consider the complaint has now been resolved.
- If your complaint may be covered by the Financial Ombudsman Service, we will send you a copy of their consumer leaflet with the letter. If you are not satisfied with EFT Finance Limited's Summary Resolution Communication and you are an [eligible complainant](#), you can complain to the Financial Ombudsman Service. You must send your complaint to the Financial Ombudsman Service within six months of the date of our Summary Resolution Communication.

If your complaint cannot be resolved in 3 days, we will keep you informed of our progress and will work to resolve the matter as quickly as possible.

## **Final Response**

We will try to give you our findings and decision as quickly as possible. For an [eligible complaint](#), we must give you our written Final Response within 8 weeks. The Final

Response will include the following:

- A summary of the complaint.
- Acknowledgement of any mistakes made.
- Whether the complaint is accepted or rejected.
- Where applicable, the reasons for rejecting the complaint.
- Where the complaint has been accepted and we intend to offer redress or take remedial action, details will be provided.
- Where applicable, we will advise you how to complain to the Financial Ombudsman Services if you disagree with the EFT Finance Limited's Final Response.

Our contact details:

**Address:** Milnwood  
13 North Parade  
Horsham  
West Sussex  
RH12 2BT

**Telephone:** 01403 258934

**Email:** [compliance@eftfinance.co.uk](mailto:compliance@eftfinance.co.uk)

## Financial Ombudsman Service

The **Financial Ombudsman Service** is a free and easy-to-use service that settles complaints between consumers and businesses that provide financial services. EFT Finance Limited will fully co-operate with the Ombudsman in resolving any complaints made against it and agrees to be bound by any awards made by the Ombudsman.

## Contact details for The Financial Ombudsman Service:

- **Online form:** <https://www.financial-ombudsman.org.uk/make-complaint>
- **Telephone:** 0800 023 4567
- **Calls using Relay UK:** (18002) 020 7964 1000
- **Email:** [complaint.info@financial-ombudsman.org.uk](mailto:complaint.info@financial-ombudsman.org.uk)
- **Accessibility:** <https://www.financial-ombudsman.org.uk/accessibility>



- **Facebook:** @financialombuds
- **Twitter:** @financialombuds
- **Website:** [www.financial-ombudsman.org.uk](http://www.financial-ombudsman.org.uk)

## Asking for Extra Help

There are times when we all need help. It could be that we have had health issues, been made redundant, or experienced other life events. We may need the help for a short period, or it may be a life-long need.

When you are looking to finance a purchase, EFT Finance Limited and the proposed lender may be able to make your journey easier by, for example, providing documents in large print or in a format that can be screen read or by giving you more time to consider your options.

It is not always easy to ask for this extra help but rest assured that we and any lender we approach on your behalf, will keep confidential any information you give us and do our best to provide the extra help you need.

If you would like to have extra help, but you would prefer to give the lender this information directly, please ask your EFT Finance Limited contact for the proposed lender contact details.