

Privacy Policy

Who we are

Our website address is: <https://pitch4finance.co.uk>.

Pitch 4 Finance is a trading style of Yellow Stone Finance Group Ltd.

Collection and Use of Personal Information

This privacy policy applies to www.pitch4finance.co.uk (Pitch 4 Finance is a trading style of Yellow Stone Finance Group Ltd/us/we/our) and its related mobile applications. It tells you (the customer) what to expect when we collect and process personally identifiable information about you and what information we will share with mortgage lenders and third parties such as solicitors and surveyors at application stage.

We will not collect any personally identifiable information about you unless it is in response to you using our application(s) or actively applying for one of our online products or services. We value your privacy and the security of your personally identifiable information is extremely important to us. The lawful basis by which we are collecting information from you is the Data Protection Act 2018 ('DPA') and the European General Data Protection Regulation ('GDPR'). This Privacy Policy explains how we process your information and your rights under both the DPA and GDPR.

The DPA and GDPR apply to 'personal data' we process, and the data protection principles set out the main responsibilities we are responsible for.

We must ensure that personal data shall be:

- a) Processed lawfully, fairly and in a transparent manner
- b) Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes
- c) Adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed
- d) Accurate and where necessary kept up to date
- e) Kept for no longer than is necessary for the purposes for which the personal data are processed. We operate a data retention policy that ensures we meet this obligation. We only retain personal data for the purposes for which it was collected and for a reasonable period thereafter where there is a legitimate business need or legal obligation to do so. **For details of our current retention policy contact our privacy officer at info@pitch4.com**
- f) Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organisational measures

To meet our Data Protection obligations, we have established comprehensive and proportionate governance measures.

We ensure data protection compliance across the organisation through:

- a) Implementing appropriate technical and organisational measures including internal data protection policies, staff training, internal audits of processing activities, and reviews of internal HR policies
- b) Maintaining relevant documentation on processing activities
- c) Implementing measures that meet the principles of data protection by design and data protection by default including data minimisation, pseudonymisation, transparency, deploying the most up-to-date data security protocols and using data protection impact assessments across our organisation and in any third party arrangements

This privacy policy is regularly reviewed to make sure that we continue to serve your privacy interests. We reserve the right to update this privacy policy as we deem necessary. Any changes will be posted on our site and if you have an account with us we will contact you directly if we deem it necessary.

For the purpose of the General Data Protection Regulation (GDPR) 2018, the registered data controller is Pitch 4 Finance (Company Registration No. 11224486) a trading style of Yellow Stone Finance Group Ltd (Company Registration No. 10734241).

Our registered and trading address is Unit 1, Verney House, 1b Hollywood Road, London SW10 9HS

Our Information Commissioner's Office (ICO) registration number is ZA361922.

The Data Protection Officer is Miranda Khadr. If you require more info on GDPR and your rights under Data Protection or would like to make a complaint about the firm. Please contact Miranda Khadr directly.

Email: mkhadr@pitch4.com Telephone: 0203 824 2275.

You can contact the ICO directly on 0303 123 1113 or email dataprotectionfee@ico.org.uk. Alternately you can write to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

What information we collect:

When you create an account and complete a Business or Property Loan Enquiry form on our website, we collect the following information from you:

- Name and contact details;
- Residential Address;
- Directors name and contact details
- Residency and legal status;
- Employment and Remuneration details;
- Financial information such as income, financial commitments and credit history
- Any other personally identifiable information and any other information of the corporate customer that may be necessary for the completion of a loan enquiry. This may depend on and vary with the type of loan you are enquiring about.

In addition to the above Pitch 4 may prompt you to provide/upload additional information during the subsequent stages of the matching and loan application process as well as that information may be collected via direct communication with

our platform and client administrators by phone, email or the platform's live chat feature – for example:

- Identification and address verification;
- Payslips and contracts of employment;
- Company Accounts, SA302s and tax year overviews;
- Personal and Business Bank statements;
- Business or Personal Credit report;
- Any other information that may be relevant and necessary for the completion of a loan application. This may depend on and vary with the type of loan you are enquiring about;

We also collect information about your computer, including your browser type, your operating system, your device type and your IP address. We collect this information for site optimisation, product and service improvements and statistical purposes. For more information on this please refer to our cookie policy.

As we may also collect personal information from you over the telephone, please note that telephone calls are recorded for training and monitoring purposes. How we will use your information:

The information we collect about you will in the main be used for the purpose of applying for a loan or any other product or service we offer.

Other ways in which we will use your information include:

We will use your information to:

- Operate and manage any Pitch4 Finance trading as Yellow Stone Finance Group Ltd account you hold with us;
- Operate and manage the matching process for your loan enquiries;
- Operate and manage the application process for your loan enquiries;
- Carry out market research, business and statistical analysis;
- Test our systems and develop our products and features (or any other similar purpose);
- Fraud and crime prevention
- Comply with any regulatory obligations or criminal investigations
- If you have consented, we will contact you by any medium you have agreed to or provided us with details of, in relation to our services.

We will hold your personal data on our systems as follows:

Your personal data will only be used and shared for its intended purpose only.

- Your basic account details such as your name and various contact information will be retained until such time that you delete your Pitch 4 Finance trading as Yellow Stone Finance Group Ltd account. It is your responsibility to ensure the information we hold is up to date.
- All data relating to a completed loan application will be kept on our systems for a minimum of 6 years after repayment of the loan in line with our regulatory requirements;

- All data relating to any loan enquiry that has progressed to loan application but that has not resulted in a drawdown of funds will be kept on our systems for 6 years or, if prior, until such time that you delete your Pitch4 Finance trading as Yellow Stone Finance Group Ltd account.
- All data relating to any loan enquiry that has not progressed to loan application will be kept on our systems for 6 years or, if prior, until such time that you delete your Pitch4 Finance trading as Yellow Stone Finance Group Ltd account.
- We may also use your anonymized data for internal statistical analysis purposes and reserve the right to do so even if you have deleted your Pitch4 Finance trading as Yellow Stone Finance Group Ltd account.

We may share your information with the following entities:

Data sharing with the entities listed below is for legitimate reasons, otherwise we will request consent from you to share data.

- Any Pitch4 Finance which is a trading style of Yellow Stone Finance Group Ltd group company;
- Any Pitch Black Technologies group company, Company number 11223755;
- Yellow Stone Finance Group Ltd – FCA authorized and regulated by the Financial Conduct Authority (FCA) No 814533.
- Any regulatory/governmental body, ombudsmen or law enforcement agency with relevant jurisdiction;
- Any firm we may use for electronic identification and address verification purposes, sanction searches or PEP monitoring;
- Any firm we may use for credit referencing and/or credit scoring;
- Any loan provider registered to Pitch4 Finance trading as Yellow Stone Finance Group Ltd to facilitate the loan application process;
- Any third parties that participate in your loan process (e.g. solicitors, valuers and conveyancers);
- Suppliers who process your data on our behalf; we will have written contracts in place with such entities which require them to process your data only in accordance with our instructions; and
- Any person or legal entity to whom we sell or transfer (or initiate discussions with to sell or transfer) our business or any part of it or any of our rights or obligations under any agreement we may have with you. If the transfer goes ahead, you agree that the purchaser can use your data in the same way as us.

We will ensure your data remains within the EEA and as a result is captured under the General Data Protection Regulation. If for any reason we use third parties that are domiciled outside of the EEA any such data storage or data processing will undergo further enhanced controls and checks, to ensure actual data storage and processing remains compliant with the General Data Protection Regulation. We will inform you of any such instance where this may occur.

Google Analytics

The Pitch 4 Finance (a trading style of Yellow Stone Finance Group Ltd) platform also uses Google Analytics to allow us to monitor how users use our Website. We use services provided by Google to do this including Google's Remarketing and

Advertising Reporting Features. The features that we use include Google Display Network Impression Reporting, Google Analytics Demographics and Interest Reporting and integrated services that require Google Analytics to collect data for advertising purposes including the collection of the data via advertising cookies and identifiers. As part of this activity, if you have a Google account and have allowed Google to associate your web and app browsing history so that you may receive personalised ads then Google may collect a Google identifier which allows them to identify your Google account when you are using this Website (including where you use different devices to access this website).

Google use this data alongside other data they may collect about you, which may include your location, search history, YouTube history and data from other sites that partner with Google, to provide us with aggregated and anonymised information which assists us in understanding how individuals are using our website. Alongside Google Analytics, this website uses Accelerated Mobile Pages (AMP), this is a service provided by Google which allows webpages to load more quickly on a mobile device by allocating a Client ID to your mobile device if you have loaded the web page before. **Please refer to our cookie policy for details of the cookies that are used in relation to Google Analytics activity.** If you require further information or wish to opt out of Google Analytics Remarketing and Advertising Reporting Features, then please visit [Google's currently available opt-outs](#).

Your rights under the General Data Protection Regulation (GDPR) 2018

Under the General Data Protection Regulation 2018, you have various rights in relation to your information. Detailed below are your rights and a description of each one.

You have the right to:

- **Be informed**

This means you have the right to be informed about the collection and use of your personally identifiable data.

You have the right to ask us not to process your personal data for marketing purposes. We will inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at info@pitch4.com.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers, and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

- **Have access to your information**

You have the right to access your personally identifiable data and supplementary information. This will be provided free of charge within one month upon request.

However, when a request is manifestly unfounded, excessive or repetitive we reserve the right to charge a fee. We may also charge a reasonable fee to comply with requests for further copies of the same information. You can request access to your information by emailing us at subjectaccessrequest@pitch4.com.

- **Have personally identifiable information rectified**

You have a right to have inaccurate personal data rectified, or complete it if it is incomplete. We will make any amendments or additions within one month of customer request and inform you when any inaccurate information is corrected.

- **Erase your personally identifiable information**

The right to erasure is also known as 'the right to be forgotten'. You can make a request for erasure of information verbally or in writing. This is information which is no longer needed, that was originally collected or processed, or where we have relied on consent to process the data; when the consent is withdrawn and there is no other legitimate reason for continuing to process the data. We will respond to your request within one month. The right is not absolute and only applies in certain circumstances. For example, it does not apply when we have statutory or regulatory obligations to keep your data.

- **Restrict processing of personally identifiable data**

You have the right to request the restriction or suppression of your personal data. This is not an absolute right and only applies in certain circumstances. Whilst we are reviewing the accuracy or completeness of data or deciding whether a request for data erasure is valid, the company will continue to store the data, but will not further process it until we have resolved the issue. Essentially, we are permitted to store the data, but not use it.

Port your personally identifiable data

This right allows you to obtain and reuse your personally identifiable data for your own purposes across different services. It allows you to move, copy or transfer personally identifiable data easily from one controlled IT environment to another in a safe and secure way, without hindrance to usability.

- **Object to the processing of your data**

You have a right to object to the processing of your data for purposes of scientific or historical research and statistics, as well as for the purposes of direct marketing (including profiling). You also have the right to object in cases where processing is based on legitimate interests, where our requirement to process the data is overridden by the rights of the individual concerned.

- **Challenge any decision made by automated decision making**

We will inform you when we employ automated decision making and when we do we will give you information about the processing activity. We will introduce simple ways for you to request human intervention or challenge a decision made by automated decision making.

If you have changed your mind about receiving marketing from us, you can opt out at any time by clicking the unsubscribe button or the link at the bottom of any of our marketing emails. Alternatively, you can email us at unsubscribe@pitch4.com

- **Retention of your data**

We will only keep your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. When you leave us as a client, we shall agree a data retention period with you and after expiry of this period, your personal data shall be deleted.

Information security

We pride ourselves on treating your data with the utmost care and security. Our systems have been designed to meet or exceed required standards and we are constantly monitoring these to provide improvements where available.

We will never store passwords in plain text, nor will we allow anyone to access your data unless they have a justifiable reason to do so. All of our employees are background checked before they are granted access to your data.

Credit decisions, the prevention of fraud and money laundering

Your lender may use credit reference and fraud prevention agencies to help them make decisions. A short and general guide on how a lender may use your information is detailed below. Access to a lender's privacy policy will be made available to you at the point of progressing an Agreement in Principle (AIP) to application stage with a selected lender. We recommend that you perform a read-across of the lender's privacy policy with this.

Please contact the lender direct should you require details beyond those set out in their privacy statement.

A condensed guide to the use of your personally identifiable information by a lender, credit reference and fraud prevention agencies.

If you apply for a loan via Pitch 4 Finance trading as Yellow Stone Finance Group Ltd, we will provide the information we hold about you to our registered lenders. The lenders will use this information to help make a decision about whether or not to lend to you. This may involve checking the following records about you and others:

- Its own records;
- Information that you have provided/uploaded to Pitch 4 Finance trading as Yellow Stone Finance Group Ltd for the purpose of a loan enquiry or loan application
- Those at Credit Reference Agencies (CRAs); and
- Those at fraud prevention agencies (FPAs).

When Credit Reference Agencies receive a search request from the lender, they will place a search footprint on your credit file that may be seen by other lenders. They

supply to lenders both public (including the electoral register) and shared credit and fraud prevention information. Having multiple search footprints on your credit file may affect your ability to borrow in the future.

The lender may make checks such as assessing your application for credit and verifying the applicants' identities to prevent and detect crime and money laundering. The lender may also make periodic searches at CRAs and FPAs to manage your account with them.

If you are making a joint application or tell us or the lender that you have a spouse or financial associate, the lender may link your records together, so you must be sure that you have their agreement to disclose their information. CRAs also link your records together and these links will remain on your and their files until such time as you or your financial associate successfully files for a disassociation with the CRAs to break that link.

Information on loan applications will be sent to CRAs and will be recorded by them. Where you borrow from a lender, the lender will give details of your accounts and how you manage it/them to CRAs. Hence if you borrow and do not repay in full and on time, CRAs will record the outstanding debt. This information may be supplied to other organizations by CRAs and FPAs to perform similar checks and to trace your whereabouts and recover debts that you owe. Records remain on file for 6 years after they are closed, whether settled by you or defaulted.

If you give false or inaccurate information and a lender suspects or identifies fraud, a lender may record this and may also pass this information to FPAs and other organisations involved in crime and fraud prevention.

If you have borrowed from a lender and do not make payments that you owe them, the lender will trace your whereabouts in order to recover debts. The lender and other organisations may access and use the information recorded by fraud prevention agencies based in other countries.

Automated credit decisions

Your loan application may be assessed by the lender by the means of automated decision making and if it is declined we will endeavour to request from the lender the actual reason why the application has been declined. Once we know this reason we will contact you as soon as we are able to convey this to you.

Marketing Consent

Pitch 4 Finance is committed to protecting and respecting your privacy, and we'll only use your personal information to administer your account and to provide the products and services you requested from us.

From time to time, we would like to contact you about our products and services, as well as other content that may be of interest to you. By entering your email into the platform you are agreeing to receive our marketing information.

You can unsubscribe from these communications at any time by following the unsubscribe link within the communications.

Complaints

If you have a complaint about how we handle your data please write to our Technical Director, Rafal Straburzynski:

- By email at info@pitch4.com
- By letter, addressed to: Pitch 4 Finance trading as Yellow Stone Finance Group Ltd, Unit 1, Verney House, 1b Hollywood Road, London SW10 9HS; or
- By telephone on 0207 495 6211.

Please include your name and address, a contact telephone number, the email address you signed up with and details of why you are unhappy. If we do not have enough information to investigate your complaint, we will contact you to ask for further information. We will investigate your complaint promptly and will respond to you as soon as we can detailing our findings of your complaint.

If we have been unable to resolve your information rights concern, you can raise the matter with Information Commissioner's Office ("ICO"). They will use the information you have provided, including our response to your concerns, to decide if your concern provides an opportunity to improve information rights practice.

You can contact the ICO by either by calling their helpline on 0303 123 1113 or by using their '[live chat](#)' system. Alternately you can write to:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

How to find out more

Your lender will have their own separate privacy policy, for more information on how they handle your personal information please refer to them direct.

If you wish, you can also contact the Credit Reference Agencies (CRAs) directly. The information they each hold about you may not be the same so you might need to contact them all. You should check with them if a fee is payable for this information.

- **Call Credit** Consumer Services Team, PO Box 491, Leeds, LS3 1WZ0870 0601414 – www.callcredit.co.uk
- **Equifax PLC** Credit File Advice Centre, PO Box 3001, Bradford, BD1 5US – 0870 010 0583 – www.myequifax.co.uk
- **Experian** Consumer Help Service, PO Box 8000, Nottingham NG – 800844 4818000 – www.experian.co.uk