Privacy Notice

Who we are:

We are Bramley Commercial Finance Ltd. We are a commercial finance broker based in the United Kingdom and can be contacted using the following details:
Telephone Number: 07498 258260
Address: 1 Top Farm Court Top Street, Bawtry, Doncaster, South Yorkshire, DN10 6TF
Email: info@bramleycf.co.uk
We are registered with the Information Commissioners office (ICO), and this can be checked at:
Information Commissioner's Office - Register of data protection fee payers
Company Registration Number: 17522634

Bramley Commercial Finance Ltd is an Appointed Representative of Alfred Vaughan & Co Limited trading as Vaughans who are authorised and regulated by the Financial Conduct Authority under FRN 966356 and are members of the National Association of Commercial Finance Brokers (NACFB). Member No: 30347. Alfred Vaughan & Co Limited trading as Vaughans are our 'Principal Firm'.

Alfred Vaughan & Co Limited trading as Vaughans can be contacted using the following details :
Telephone Number: 0330 122 2247
Address: Belmont House, 75 Church Street, Bentley, Doncaster, DN5 0BE
Email: Info@vaughans.co
Data Protection contact: Paul Brookes
ICO Registration Number: ZB278346
Company Registration Number: 13630524
Authorised and regulated by the Financial Conduct Authority, FRN: 966356

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 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 and how?

Data provided by you:

- Funder application details: for example but not limited to, your name, national insurance number, postal address, your email address, your IP address, telephone numbers, date of birth, bank account details, equipment requirement details, home ownership details, reason for borrowing, your assets and liabilities, details of your proof of identity documentation, 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 :

- 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.

- Payment data: for example, the amount, origin, frequency, history and method of your payments.
- 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.
- Register online or other communication methods for our services.
- Voluntarily complete a customer survey or provide feedback on any of our message boards or via email.
- Use or view our website via your browser's cookies.

Data provided to and by third parties

- Data from our principal firm.
- Data from persons that introduce you to us: for example, brokers, product suppliers, financial advisers, agents, finance providers or other third parties.
- Data from credit reference agencies, most likely to be either Experian, Creditsafe, Equifax or CallCredit
- Data from fraud prevention agencies.
- 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.
- Data from your representatives where relevant: for example, your legal and financial advisers such as lawyers and accountants.**
- Data from your employers and medical data where relevant.*

*In certain circumstances we may ask you to provide us with medical information if we determine that this is a requirement for us to either proceed to enter into the agreement with you or once we have entered into the agreement with you determine that the same is necessary for whatever reason. Full details as to the reason for our request and how we will use this information will be given to you at the time should we request such information from you. You will be asked to consent to the provision of this information.

**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

During your interactions with us and Alfred Vaughan & Co Limited trading as Vaughans you may share information that is classified as 'Special Category Data'. This could include data about:

- Race
- Ethnic origin
- Politics
- Religion
- Trade union membership
- Genetics
- Biometrics
- Health
- Sex life
- 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, we and our principal firm will always seek explicit consent from you to store and process such information.

Why is personal data collected by us

We collect personal data for several 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.

How will we use your data?

Our Company collects your data so that we can:

- Process your application and manage your request
- Email you with special offers on other products and services we think you might like
- To monitor the performance of our products and services to ensure consumer outcomes are being achieved
- To collate survey data
- Meet our obligations to our principal firm, whose own privacy notice can be viewed here Privacy Policy - Alfred Vaughan & Co Limited
- We may also process your personal information to allow us to comply with certain legal obligations to which we are subject to

Lawful Basis for Processing Data

Data Type	Lawful Use for Processing
Personal identification information	Used as part of the due diligence process of the client.
Contact information	Used to contact the client.
Special category data	Used as part of the due diligence process, if applicable.
Financial information	Used as part of the due diligence process to source finance.

Products and services	Used to inform the client about relevant products and/or services.
Direct marketing	Used to market to the client, if relevant consent is held.
Relationship management	Used to maintain our relationship with the client.
Regulatory	Used to meet our regulatory responsibilities.
Anti-money laundering	Used to comply with our anti-money laundering and know your client requirements.

Where we store your personal data

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

All information you provide to us is stored on our secure servers. Any payment transfers will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site: any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try and prevent unauthorised access.

When Personal Data is shared

Your personal data may be used by our principal firm, 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:

- Right to be informed – Individuals have the right to be informed about the collection and use of their personal data
- 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.
- The right to rectification- Individuals have the right to have inaccurate personal data rectified or completed if incomplete.
- The right to erasure – Individuals have the right to have their personal data erased.
- The right to restrict processing – Individuals have the right to request the restriction or suppression of their personal data.
- The right to portability – This allows individuals to obtain and reuse their personal data for their own purposes across different services.
- 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
- 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@vaughans.co

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@vaughans.co or call us on 0330 122 2247.

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

We understand that with the introduction of the Consumer Duty, it is likely the level of communications issued by our businesses 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, as well as those of our partner companies.

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 us from contacting you for marketing purposes.

Cookies

We do use cookies to track and test customer engagement and actions throughout the customer journey or customer communications. We 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, www.allaboutcookies.org

How do we use cookies?

Our Company use cookies in a range of ways to improve your experience on our website(s), including:

- Keeping you signed in
- Understanding how you use our website
- Remembering your search settings
- Determining if you are logged on or not

What types of cookies do we use?

There are several different types of cookies, however, our website(s) use:

Necessary – Our Company and our principal firm use these cookies to enable the basic features of our sites, such as providing secure log-in or adjusting your consent preferences. These cookies do not store any personally identifiable data.

Functionality – Our Company uses these cookies so that we recognize you on our website(s) 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.

Visitor Statistic – Our Company use these cookies to compile visitor statistics such as how many people have visited our websites, what type of technology they are using, how long they spend on the site, what page they look at etc. This helps us to continuously improve our website. These so called “analytics” programs also tell us how people reached this site (e.g. from a search engine) and whether they have been here before.

Advertising – Our Company uses these cookies to collect information about your visit to our websites, 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 websites.

Third Party - Our site, like most websites, include functionality provided by third parties. A common example is an embedded Google Map. Our site includes the following third-party functions which use cookies:

Google Analytics
LinkedIn
YouTube

Disabling these cookies will likely break the functionality offered by these third parties.

Uncategorised – Other uncategorised cookies are those that are being analysed and have not been classified into a category yet.

Social Media Website - If you take the opportunity to share website content on social media, then you may well be sent cookies from the relevant website. The privacy implications on this will vary depending on the social network and will be dependent on the privacy settings you have chosen on these networks.
We don't control the setting of these cookies, so we suggest you check the third-party websites for more information about their cookies and how to manage them.

How to Manage Cookies and Preferences

You can set your browser not to accept cookies, and this website www.allaboutcookies.org 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.

Cookie Policy and Settings

As an appointed representative of our principal firm, where we also have our own hosted website(s), you can view our company's cookie policy(s) and change your preferences any time by clicking the links on that website. This will let you revisit the cookies consent banner and change your preferences or withdraw your consent right away.

You can view our principal firms' cookie policies and change your cookies preferences any time by clicking the links below. This will let you revisit the cookies consent banner and change your preferences or withdraw your consent right away.

For www.vaughans.co please click https://vaughans.co/cookie-policy/
For www.commercialfinancebroker.com please click https://commercialfinancebroker.com/cookies-policy/

In addition to this, different browsers provide different methods to block and delete cookies used by websites. You can change the settings of your browser to block/delete the cookies (please see our Cookie Policy for further details).

Privacy Policies and Cookie Policies of other websites

Our website(s) and documentation may contain links to other websites. If you access another website, our privacy policy and cookies policy no longer apply, and we recommend you review that sites privacy policy and cookies policy to establish how they will process your data.

Changes to our privacy policies

Our company keeps our privacy policy under regular review and places any updates on this web page. This privacy policy was last updated on 2nd September 2026.

Use of Artificial Intelligence

We may use artificial intelligence (AI) and AI-enabled technology to assist us in processing your personal data for the following purposes.

AI may be used as an assistive technology by us, our employees and our Principal in connection with the administration and delivery of our commercial finance broking services. AI may assist with reviewing, organising and summarising information, identifying patterns or inconsistencies, preparing draft content and communications, and supporting administrative, operational and compliance activities.

Capacity in which AI is used	Specific purpose of processing
Administrative and operational support	To assist us, our employees and our appointed representatives with the administration and management of finance enquiries, applications, client information and related activities.
Information review and summarisation	To assist with reviewing, organising, extracting and summarising information provided in connection with finance enquiries, applications and the provision of our services.
Analysis and pattern	To assist in identifying patterns, trends, discrepancies or inconsistencies in

identification	information which may require further human review or consideration.
Content and document preparation	To assist in preparing draft correspondence, documents, reports, summaries and other business content used in connection with our services.
Employee and appointed representative support	To assist our employees and appointed representatives in carrying out their functions and providing commercial finance broking services to clients efficiently and effectively.
Compliance and quality assurance	To assist with compliance, quality assurance, monitoring and fraud-prevention activities where appropriate.
Service and process improvement	To assist us in improving the efficiency, consistency and quality of our internal processes and the services we provide.

AI is used to support and assist our employees and appointed representatives and does not replace appropriate human judgement. We do not rely solely on AI to make decisions that have a legal or similarly significant effect on you, including decisions regarding your eligibility for finance.
Where we use third-party AI-enabled technology providers, we will take appropriate steps to ensure that the processing of personal data is carried out in accordance with applicable data protection legislation and that appropriate security and contractual safeguards are in place.

How to contact us

If you have any questions about our Company 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.

Email us at: info@bramleycf.co.uk
Call us: 07498 258260
Or write to us at: 1 Top Farm Court Top Street, Bawtry, Doncaster, South Yorkshire, DN10 6TF

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/.