

# Privacy Policy GDPR (and CCPA)

## General Principles:

Turnford Systems Inc (dba "Leasepath") understands that your privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone who visits this website, <http://www.leasepath.com> ("Our Site") and will only collect and use personal data in ways that are described here, and in a manner that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy and Our Cookie Policy which constitutes part of this agreement carefully and ensure that you understand it. Your acceptance of our Privacy Policy is deemed to occur upon your first use of Our Site. If you do not accept and agree with this Privacy Policy, you must stop using our Site immediately.

## What Does This Policy Cover?

This Privacy Policy applies only to your use of our site. Our site may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

## What Data is Being Collected?

### Our Websites:

[leasepath.com](http://leasepath.com), [turnford.com](http://turnford.com)

Data we collect from you through our websites include your name, job title, business / company name, email and phone number. These are details you provide when engaging with us on our contact us / demo request forms. Our site may also place and access certain first party cookies on your computer or device. These cookies are detailed in our [Cookie Policy](#). This policy is incorporated into this Privacy Policy by this reference.

### Job applicants, current and previous

Leasepath has a legitimate interest to collect information including curriculum vitae (résumés), covering letters and other information provided as part of the application process, including data input on an application form or information provided during the interview process.

We may collect this information via our website, recruitment fairs, recruitment agencies, third party recruitment tools such as LinkedIn and Indeed, and during the application process. We will use this information only for our recruitment process.

The information you provide will be retained by our HR department and will be shared with other Leasepath employees conducting interviews. Leasepath will keep a history of applicants to help us manage where we receive applications from multiple sources.



We use secure cloud systems from Microsoft to manage our recruitment process and recordkeeping (for example SharePoint). These systems are used by Leasepath employees and covered by our responsibilities under this policy. If we outsource the review of any part of this process, they will have access to all of the personal data that you submit as part of any application. Your details will not be revealed by us to any other external persons or organizations unless we have your permission or are under a legal obligation or any other duty to do so.

For successful applicants, as part of our pre-employment screening checks we will ask for additional information. Since our clients are financial institutions, this normally includes criminal background and adverse credit history checks. We will tell you more about this if you are successful.

With your consent, we may also collect personal contact details for future candidates, for example from recruitment fairs and other industry events. We will use this information to keep you informed about our recruitment process and recruitment events. You can opt out of this by contacting us at [info@leasepath.com](mailto:info@leasepath.com).

### Information collected during software demonstrations

With your consent, Leasepath may collect and process your personal data during demonstrations of our software. The data we collect will be dependent on the demonstration. For example, as part of an end customer self-service credit application, our software might capture images of documents and your photo to verify your identity. We will clearly identify the processing that we will perform as part of any demonstration.

We will only use this data during the software demonstration, and where possible will overwrite it with dummy data. We will not use this data for any other purpose, and will regularly purge data from our demonstration environment.

### How Do We Use Your Data?

All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with our obligations and safeguard your rights under the GDPR at all times.

Our use of your personal data will always have a lawful basis, either because it is necessary for our performance of a contract with you, because you have consented to our use of your personal data (e.g. by subscribing to emails), or because it is in our legitimate interests. Specifically, we may use your data for the following purposes:

- Providing and managing your Account.
- Providing and managing your access to our Site.
- Supplying our products and services to you (please note that We require your personal data in order to enter into a contract with you).
- Personalizing and tailoring our products and services for you.
- Replying to emails from you.
- Supplying you with emails that you have opted into (you may unsubscribe or opt-out at any time by clicking unsubscribe).

- Analyzing your use of our Site and gathering feedback to enable us to continually improve our Site and your user experience.

With your permission and/or where permitted by law, we may also use your data for marketing purposes which may include contacting you by email and/or telephone with information, news and offers on our products and services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that we fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003.

You have the right to withdraw your consent to us using your personal data at any time, and to request that we delete it. You can do this by using the contact details provided in this Privacy Policy.

## How Long Do We Keep Your Data?

We will only retain 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 unauthorized 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.

We periodically review the data that we hold to ensure that we are not holding any information for any longer than necessary for its purpose.

## How and Where Do We Store Your Data?

We only keep your personal data for as long as we need to in order to use it as described above and/or for as long as we have your permission to keep it.

Some or all of your data may be stored outside of the European Economic Area (“the EEA”) (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein). You are deemed to accept and agree to this by using our site and submitting information to us. If we do store data outside the EEA, We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under the GDPR including using GDPR Compliant suppliers to process and store Personal Data.

## Do We Share Your Data?

We take your privacy seriously and the information we hold about you is confidential. We may share your information with other companies in our group for providing you with our products and services, maintaining your account and monitoring the use of our products and services. This includes our parent companies and its subsidiaries

We may sometimes contract with third parties to supply products and services to you on our behalf. These may include payment processing, delivery of goods, search engine facilities, advertising, and marketing. In some cases, the third parties may require access to some or all of your data. Where any of your data is required for such a purpose, we will take all reasonable steps to ensure that your data will

be handled safely, securely, and in accordance with your rights, our obligations, and the obligations of the third party under the law.

We may compile statistics about the use of our site including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymized and will not include any personally identifying data, or any anonymized data that can be combined with other data and used to identify you. We may from time to time share such data with third parties such as prospective investors, affiliates, partners, and advertisers. Data will only be shared and used within the bounds of the law.

We may sometimes use third party data processors that are located outside of the European Economic Area (“the EEA”) (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein). Where we transfer any personal data outside the EEA, we will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under the GDPR.

In certain circumstances, we may be legally required to share certain data held by us, which may include your personal data, for example, where we are involved in legal proceedings, where we are complying with legal requirements, a court order, or a governmental authority.

## Links to Other Websites

Please note that this data Privacy Policy only applies to Turnford Systems Inc and Leasepath websites. If you follow a link to another site from this one, we are not responsible for the safety of the information you give there. You are responsible for reviewing and abiding by the privacy policies of these third party sites to ensure they comply with the data protection requirements.

## What Happens If Our Business Changes Hands?

We may, from time to time, expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of our business. Any personal data that you have provided will, where it is relevant to any part of our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use that data only for the same purposes for which it was originally collected by Us.

In the event that any of your data is to be transferred in such a manner, you will not be contacted in advance.

## Your Rights and How to Contact Us:

As a data subject within the EU, you have the following rights under the GDPR, which this Policy and our use of personal data have been designed to uphold:

- The right to be informed about our collection and use of personal data
- The right of access to the personal data we hold about you.
- The right to rectification if any personal data we hold about you is inaccurate or incomplete.
- The right to be forgotten – i.e. the right to ask us to delete any personal data We hold about you (We only hold your personal data for a limited time, as explained in this policy but if you would like us to delete it sooner, please contact us.
- The right to restrict (i.e. prevent) the processing of your personal data.

- The right to data portability (obtaining a copy of your personal data to re-use with another service or organization).
- The right to object to us using your personal data for particular purposes and Rights with respect to automated decision-making and profiling.

You can exercise any of these rights by contacting us at [info@leasepath.com](mailto:info@leasepath.com)

We'll respond to your request without delay and at the latest within one month of your request.

You can use the same contact details if you have any cause for complaint about our use of your personal data. We will do our best to solve the problem for you. If we are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office <https://ico.org.uk>. For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau.

## How Can You Control Your Data?

When you submit personal data via our site, you may be given options to restrict our use of your data. In particular, we aim to give you strong controls on our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from us which you may do by unsubscribing using the links provided in our emails and at the point of providing your details).

You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service ("the TPS"), the Corporate Telephone Preference Service ("the CTPS"), and the Mailing Preference Service ("the MPS"). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

## How Can You Access Your Data?

You have the right to ask for a copy of any of your personal data held by us (where such data is held). Under the GDPR, no fee is payable and we will provide any and all information in response to your request free of charge. Please contact us using the contact details provided in this privacy policy.

## Your Right to Withhold Information

You may access our site without providing any data at all. However, to use all features and functions available you may be required to submit or allow for the collection of certain data.

You may restrict our use of Cookies. For more information, see our [Cookie Policy](#).

## Changes to Our Privacy Policy

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on our site and you will be deemed to have accepted the terms of the Privacy



Policy on your first use of our site following the alterations. We recommend that you check this page regularly to keep up-to-date.

## **Privacy Notice for California Residents**

Please review our privacy notice for California Residents at:

<https://leasepath.com/about-us/company-policies/>