BLUEWAVE
FINANCIAL LTD

PRIVACY NOTICE

How we collect, use, share and protect personal information

Effective date	12 October 2026
Version	1.0
Status	Public - customer and business contact notice
Company number	16886354
Registered office	161 Forest Road, London, England, E17 6HE
ICO registration reference	ZC193691

In plain English

We use personal information to respond to enquiries, assess and arrange finance, verify identity, prevent fraud, meet legal and regulatory duties, manage our relationships and improve our services. We only use information where we have a lawful basis and we share it only where necessary or permitted by law.

This notice is designed for customers, prospective customers, guarantors, directors/shareholders of applicant businesses, introducers, suppliers and other business contacts.



SIGNED D.MCCLAFFERTY 27.10.2026 UPDATED TO NACFB STANDARD

1. Who we are and when this notice applies

Bluewave Financial Ltd ("Bluewave", "we", "us" or "our") is responsible for the personal information described in this notice where we decide why and how it is used. In those circumstances, we act as a data controller.

This notice applies when you contact us, ask us to source or arrange finance, act for or support a business seeking finance, provide a guarantee, are introduced to us by a third party, visit or interact with our online services, or otherwise deal with us in a business or professional capacity.

Other organisations may also be controllers

A lender, funder, lessor, insurer, credit reference agency, fraud prevention agency, open-banking provider or other third party may act as a separate controller of the information it receives. Its own privacy notice will explain how it uses that information.

How to contact us

Data Protection Contact: Director / Compliance
Bluewave Financial Ltd
161 Forest Road, London, England, E17 6HE
ICO registration reference: ZC193691

Telephone: 0203 813 6970 | Email: dylan@bluewavefinancial.co.uk
You may also use your usual Bluewave contact. Please mark any data protection request or complaint clearly for the attention of the Data Protection Contact.

2. The personal information we may collect

Category	Examples
Identity and contact	Name, date of birth, home/business address, email, telephone number, identification documents, signatures and contact preferences.
Business and professional	Job title, directorship/shareholding, trading history, company details, ownership/control information, business plans and professional relationships.
Financial and affordability	Income, turnover, accounts, management information, assets, liabilities, bank details, transactions, existing borrowing, tax information and finance requirements.
Credit, risk and due diligence	Credit information, searches, fraud indicators, sanctions/PEP information, KYC/AML checks, source-of-funds or source-of-wealth information where relevant.
Application and transaction	Products requested, quotes, lender responses, underwriting information, supporting documents, facility details, security, guarantees and transaction history.
Communications	Emails, messages, call notes, meeting notes, complaints, feedback and records of instructions or consent.
Technical and online	IP address, device/browser information, website usage, cookies and security logs where our systems collect them.
Special category data	Only where relevant and lawful, for example health information where it affects communication needs, vulnerability support or a specific application.

3. How we obtain personal information

We may collect information from you directly and from other sources where this is lawful and relevant to the service being provided.

- Directly from you - for example by phone, email, application forms, meetings, document uploads or online enquiries.
- Introducers, advisers and professional contacts - where you or the applicant has authorised an introduction or where information is provided as part of a transaction.
- Lenders, funders, lessors and insurers - including application status, underwriting questions, decisions and transaction information.
- Public and official sources - such as Companies House, public registers, property information, sanctions/PEP sources and other lawful due-diligence databases.
- Credit reference and fraud prevention agencies - where searches or checks are appropriate and permitted.
- Identity, KYC, bank-data or verification providers - where these services are used as part of an application or compliance process.
- Our systems and service providers - including CRM, communications, security and website systems.

If you provide information about another person - for example a co-director, shareholder, guarantor or beneficial owner - you should ensure you are entitled to provide it and, where appropriate, make this notice available to them.

4. Why we use personal information and our lawful bases

We only process personal information where we have a lawful basis under UK data protection law. More than one lawful basis may apply to the same activity.

Purpose	Typical lawful basis
Responding to enquiries and taking steps before an agreement	Contract / steps at your request; legitimate interests in providing and administering our services.
Assessing finance requirements and sourcing suitable lenders/funders	Contract / steps at your request; legitimate interests in operating a finance brokerage and progressing applications.
Submitting, packaging and managing applications or transactions	Contract / steps at your request; legitimate interests; legal obligations where applicable.
Identity, KYC, AML, sanctions and fraud checks	Legal obligation where applicable; legitimate interests in preventing fraud, financial crime and misuse of services.
Creditworthiness, risk and affordability assessment support	Legitimate interests; contract / steps at your request; and, where applicable, lender or statutory requirements.
Managing customer, introducer, lender and supplier relationships	Contract; legitimate interests in business administration and service delivery.
Accounting, commission, fees, audit and record-keeping	Contract; legal obligation; legitimate interests in financial administration and evidencing transactions.

Purpose	Typical lawful basis
Complaints, disputes, legal claims and regulatory enquiries	Legal obligation; legitimate interests in resolving issues, defending rights and demonstrating compliance.
Security, monitoring and fraud prevention	Legitimate interests in protecting customers, systems, staff and the business; legal obligation where applicable.
Service improvement and management information	Legitimate interests in improving services, quality, controls and business performance, using proportionate data.
Direct marketing and updates	Consent where required; otherwise legitimate interests where lawful and consistent with PECR. You can opt out at any time.

5. Consent and more sensitive information

We do not rely on consent for every use of personal information. Where we do rely on consent - for example for a particular type of marketing or where a specific legal condition requires it - you may withdraw that consent at any time. Withdrawal does not affect processing that was lawful before consent was withdrawn.

Special category information receives additional protection. We will only use it where we have both an Article 6 lawful basis and an appropriate special-category condition, and only to the extent reasonably necessary. We do not seek sensitive information simply because it is available.

6. Who we may share personal information with

Depending on your enquiry or transaction, we may share relevant information with:

- Lenders, funders, lessors, insurers and other finance providers to obtain indicative terms, submit applications, respond to underwriting questions and progress transactions.
- Introducers, co-brokers, packagers or professional advisers where they are legitimately involved in the transaction or service.
- Credit reference agencies and fraud prevention agencies where checks are necessary and lawful. A search may leave a footprint and lenders may conduct their own searches.
- Identity, KYC, AML, sanctions, electronic verification and open-banking providers where used. We will provide additional information or obtain any required permission where a service requires it.
- IT, CRM, cloud, document, communications, cyber-security and other service providers who support our operations and are subject to appropriate contractual and security requirements.
- Accountants, auditors, insurers, solicitors, consultants and other professional advisers where necessary for business, compliance or legal purposes.
- Regulators, law enforcement, courts, tax authorities or public bodies where disclosure is required or permitted by law.
- Potential purchasers, investors or restructuring parties if there is a genuine corporate transaction, subject to appropriate confidentiality and data protection safeguards.

We do not sell your personal information

We do not sell personal information as a commodity. Where information is shared in connection with arranging finance or providing a related service, the sharing is limited to what is reasonably necessary for that purpose.

7. Credit checks, fraud prevention and third-party decisions

Where appropriate, Bluewave or a lender/funder may use credit reference agencies or fraud prevention services to verify identity, assess creditworthiness, prevent fraud or support a lending decision. Those organisations may retain and use information under their own legal responsibilities.

Bluewave does not intend to make decisions that produce legal or similarly significant effects about you solely by automated means unless we specifically tell you and the law permits it. A lender or other finance provider may use automated or partly automated underwriting; its privacy information should explain this.

8. International transfers

Some service providers or group systems may store or access information outside the United Kingdom. Where personal information is transferred to a country without UK adequacy status, we will use an appropriate safeguard where required - for example the UK International Data Transfer Agreement, the UK Addendum to approved contractual clauses, or another lawful transfer mechanism - together with proportionate security measures.

9. How long we keep personal information

We keep personal information only for as long as reasonably necessary for the purpose for which it was collected, including legal, accounting, regulatory, fraud-prevention, complaints and dispute requirements. The exact period depends on the nature of the record and the transaction.

Record type	Typical approach
Enquiries that do not proceed	Kept only for a proportionate period for follow-up, audit, complaint and legal-risk purposes, then securely deleted or anonymised.
Finance applications and completed transactions	Retained for the period needed to service the relationship and meet contractual, regulatory, tax, audit, complaint and legal-claims requirements.
KYC/AML and fraud records	Retained for the period required or justified by applicable financial-crime and record-keeping rules.
Marketing preferences	Kept while relevant; suppression records may be retained to ensure an opt-out continues to be respected.
Complaints and disputes	Kept for an appropriate period to evidence the complaint, investigation, outcome and any legal or regulatory follow-up.

At the end of the relevant period, information is securely deleted, destroyed or irreversibly anonymised unless there is a lawful reason to keep it longer.

10. How we protect personal information

We use appropriate technical and organisational measures designed to protect personal information, including access and authentication controls, secure cloud services, device protection, backups, supplier due diligence, staff training and incident response. Controls are reviewed against the sensitivity of the information and the risks involved.

11. Your data protection rights

Subject to the conditions and exemptions in law, you may have the following rights:

Right	What it means
Access	Ask whether we process your personal information and receive a copy together with relevant supporting information.
Rectification	Ask us to correct inaccurate personal information or complete information that is incomplete.
Erasure	Ask us to delete information in certain circumstances. This right is not absolute and may not apply where we must or are entitled to retain the data.
Restriction	Ask us to limit how information is used in certain circumstances.
Portability	Receive certain information you provided to us in a structured, commonly used and machine-readable format, where the legal conditions are met.
Object	Object to processing based on legitimate interests in certain circumstances, and object at any time to direct marketing.
Withdraw consent	Where processing is based on consent, withdraw it at any time without affecting earlier lawful processing.
Automated decisions	Obtain safeguards and information where a legally significant decision is made solely by automated means and the relevant legal rules apply.

How to exercise a right

Contact the Data Protection Contact using the details in section 1. We may need to verify your identity and clarify the scope of a request. We normally respond within the statutory time limit, subject to any lawful extension or pause that applies.

There is usually no fee for exercising your rights. We may charge a reasonable fee or refuse to act where the law permits this, for example where a request is manifestly unfounded or excessive.

12. Marketing and communications

We may send service communications that are necessary to manage an enquiry, application or relationship. Where we send direct marketing, we will do so in accordance with applicable data protection law and PECR.

You can opt out of marketing at any time by using an unsubscribe option where provided or by contacting us. Opting out of marketing does not prevent us from sending non-marketing communications that are necessary to administer an existing enquiry, transaction or legal obligation.

13. Data protection complaints

If you are unhappy with how we have used your personal information, please contact us first so that we can investigate and try to resolve the issue.

Current UK complaint standard

For data protection complaints made under the current UK regime, organisations are required to provide a clear route to complain, acknowledge the complaint within 30 days, investigate it appropriately and communicate the outcome without undue delay.

Please provide enough information for us to understand the issue, including your name and contact details, what happened, the information or activity concerned, and what outcome you are seeking. We may ask for further information where reasonably necessary to investigate.

You also have the right to complain to the Information Commissioner, the UK supervisory authority for data protection. Information and complaint routes are available at ico.org.uk, and the ICO helpline is 0303 123 1113.

14. Cookies and online services

Where our website or online services use cookies or similar technologies, we will provide appropriate information and choices in accordance with PECR and UK data protection law. Some low-intrusion or strictly necessary technologies may not require consent, while other cookies may require a choice before they are used.

15. Changes to this notice

We may update this Privacy Notice to reflect changes in law, regulatory guidance, our services, technology or how we use personal information. The latest version should be made available through our normal customer-facing channels. Where a change materially affects how we use existing personal information, we will take reasonable steps to bring it to the attention of affected individuals before the new use begins.

16. Important information about this notice

This notice is intended to be concise and understandable while providing the core information required for transparency. Particular products, lenders, technologies or processes may require additional privacy information at the point of collection or use. Any such notice should be read together with this document.

Regulatory basis

Prepared for a UK finance-intermediary environment with reference to the UK GDPR, Data Protection Act 2018, Data (Use and Access) Act 2025, PECR and current ICO guidance as at 12 October 2026. This notice does not itself state or imply any particular FCA or trade-association membership status.

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