



FIN-POL-013

Data Protection and Privacy Policy

A principles-led approach to protecting personal data and privacy

Finova Policy

Built on Integrity, Discipline and Trust

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Document Control

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1. Policy Statement

Finova is committed to respecting and protecting the privacy of individuals and handling personal data responsibly, lawfully, and transparently. Protecting personal data is essential to maintaining trust with counterparties, partners, and stakeholders.

This policy sets out how Finova approaches data protection and privacy across its activities.

2. Our Approach to Data Protection and Privacy

Finova adopts a principles-based and risk-aware approach to data protection, recognising that personal data may be processed in different contexts and jurisdictions.

Personal data is collected and used only where there is a legitimate business purpose and a lawful basis for doing so. Finova seeks to minimise the amount of personal data processed and to retain it only for as long as necessary.

Privacy considerations are embedded into normal decision-making and information handling practices rather than treated as a standalone compliance exercise.

3. How Personal Data is Handled

In practice, Finova:

- collects personal data fairly and transparently,
- uses personal data only for defined and legitimate purposes,
- takes reasonable steps to ensure data is accurate and kept up to date, and
- protects personal data from unauthorised access, loss, or misuse.

Personal data may relate to clients, counterparties, partners, employees, or other individuals connected to Finova's activities.

4. Sharing and International Transfers

Finova recognises that personal data may be shared with third parties or transferred across borders as part of legitimate business activity.

Personal data is shared only where necessary and where appropriate safeguards are in place. International transfers are approached cautiously, with due regard to applicable legal requirements and the level of protection afforded in the destination jurisdiction.

Finova does not sell personal data or use it for purposes unrelated to its legitimate activities.

5. Individual Rights and Transparency

Finova respects the rights of individuals in relation to their personal data, including rights of access, correction, and, where applicable, erasure or restriction.

Requests relating to personal data are handled promptly and responsibly, subject to legal and regulatory requirements.

Finova seeks to be transparent about how personal data is handled and provides appropriate information to individuals where required.

6. Governance and Oversight

Responsibility for data protection and privacy sits with Finova's management, supported by appropriate oversight and escalation mechanisms.

Data protection concerns, suspected breaches, or incidents must be escalated promptly so that appropriate action can be taken.

Finova may seek external professional advice where necessary to ensure lawful and responsible handling of personal data.

7. Alignment with Recognised Data Protection Principles

Finova's approach to data protection and privacy is informed by recognised data protection principles and legal frameworks, including those reflected in regulations such as the UK GDPR, EU GDPR, and other applicable privacy laws.

References to such frameworks guide approach and judgement, without implying registration, certification, or regulatory designation.

8. Review and Continuous Improvement

This policy is reviewed periodically to ensure it remains appropriate, effective, and aligned with Finova's activities and operating environment.

As data protection requirements evolve, Finova's approach will adapt accordingly, and this policy will be updated where necessary to reflect changes in law or practice.

End of Policy

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