



Marketing Statement

5 September 2022

1. INTRODUCTION

- 1.1. Please read this Marketing Statement carefully as it contains important information on who we are and how we use your Personal Data for marketing
- 1.2. This Marketing Statement should be read in conjunction with our [Privacy Notice](#).
- 1.3. You should refer to the [Privacy Notice](#) for our corporate details, contact details, information about your rights and how to raise a concern/make a complaint.

2. PERSONAL DATA

Except as set out in this Marketing Statement, your Personal Data will be collected, processed, used, stored, managed and retained under the [Privacy Notice](#).

3. HOW IS YOUR PERSONAL DATA USED

- 3.1. How we use your Personal Data is set out in our [Privacy Notice](#). This Marketing Statement expands on our use of your Personal Data for marketing.
- 3.2. In respect of marketing, we may use your Personal Data as follows:
 - 3.2.1. Advertising and marketing our products and services:
 - sending you offers and promotions by email, SMS, direct mail and through telemarketing;
 - providing you with the information, products and services that you request from us; and
 - permitting our business partners, affiliates and other selected third parties to provide you with information about goods or services we feel may interest you.
 - 3.2.2. Our Website or any communications with you may, from time to time, contain links to and from the websites of our business partners and affiliates. If you follow a link to or from any of these websites, you should note that these websites have their own privacy notices and that we do not accept any responsibility or liability for these notices. Please check these notices before submitting personal data or other information to these websites;
 - 3.2.3. Advertising and marketing of products and services of our third-party business partners and affiliates
 - third-party business partners and affiliates sending you offers and promotions by email, SMS, direct mail and through telemarketing;
 - third-party business partners and affiliates contacting you and providing you with the information, products and services that you request from them; and
 - third-party business partners and affiliates using Personal Information about you to identify goods and services in which you may be interested.



3.2.4. Improving our products and services and conducting research and analysis

- obtaining your views on our goods, services and Website/Fluro Platform (available to Fluro Borrowers);
- analysing the effectiveness of our ads, promotions and offers;
- conducting testing of our systems, Website, Platform and other operations; and
- performing statistical analysis and/or conducting wider market research.

4. **LAWFUL BASIS FOR PROCESSING**

4.1. We will process your personal data under this Marketing Statement:

4.1.1. with your consent; or

4.1.2. where it is in our (or a third-party's) legitimate interest for us to do.

5. **RIGHT TO OBJECT**

5.1. Where we are relying on Legitimate Interests (i.e any direct marketing where we have not sought your consent), you can assert your right to object. Please refer to our [Privacy Notice](#) for further information.

6. **WITHDRAWING CONSENT**

6.1. You are entitled to withdraw your consent at any time.

6.2. After you have given us your consent to process your personal data as set out in this Marketing Statement, you have the right to withdraw your consent at any time.

6.3. To withdraw your consent, sign in to your account, visit the "My details" page and change your "Email preferences". You can also click unsubscribe in any marketing email we send you.

6.4. You acknowledge and agree that we will not be able to retrieve any Personal Information we have sent to any third parties based on your initial consent.

7. **REMARKETING**

7.1. Remarketing is a way for us to connect with users, based on your past interactions with the Website. Third-party marketing vendors may be hired by Fluro to perform remarketing services.

7.2. As a result, third-party vendors, including Google, may show our adverts on websites you visit on the internet. Third-party vendors, including Google, use cookies to serve advertisements based on a user's prior visits to our Website.

7.3. To opt-out of customised Google Display Network ads click [here](#).

7.4. To learn more about how Google uses any data it collects please visit http://www.google.com/privacy_ads.html. If you withdraw your consent to this Marketing Statement, you will still have to carry out the "opt-out of customised Google Display Network ads" under this paragraph separately as we cannot make this change for you.



8. WHAT ABOUT CHANGES?

- 8.1. We may change any provision of this Marketing Statement at any time without your permission.
- 8.2. When we make changes to this Marketing Statement, our updated Marketing Statement will be displayed on the Website or we will notify you by sending you a notification message within your Fluro Account or by emailing you.