



Privacy Notice

Who we are

Vaughans is a trading style of Constructive Asset Finance Ltd who are Independent Commercial Finance Brokers based in the United Kingdom. We act as a Broker for our customers.

Registered Address:
Olympic Court
Whitehills Business Park
Blackpool
Lancashire
FY4 5GU

Company Number: 14996682

Constructive Asset Finance Ltd T/As Vaughans is an Appointed Representative of Alfred Vaughan & Co Limited 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.

What data do we collect?

Our Company collects the following data:

- Personal identification information - Such as your name and date of birth.
- Contact information - Such as your telephone number, postal address or email address.
- Special category data - We may also process special categories of personal data (sensitive data) such as data about your health or medical conditions. Prior to processing special category data, we will gain your informed and explicit consent.
- Financial information - Such as salary information, bank statements, financial accounts or credit referencing information.

How do we collect your data?

You directly provide Our Company with most of the data we collect. We collect data and process data when you:

- 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.
- When completing an application for finance.
- In the course of face to face or remote meetings.

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.
- Collate survey data.
- Meet our obligations to our Principal Firm, Alfred Vaughan & Co Limited whose own privacy notice can be viewed here <https://commercialfinancebroker.com/privacy-policy> We may also process your personal information to allow us to comply with certain legal obligations to which we are subject to.

Data Type	Data use
Personal identification information	Used a part of the due diligence process
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 due diligence process to source finance

Lawful Basis for Processing Data

Data Type	Lawful Basis for Processing
Personal identification information	Article 6 {1}{b} - contract
Contact information	Article 6 {1}{b} - contract
Special category data	Article 6 {1}{a} - consent
Financial information	Article 6 {1}{b} – contract
Products and Services updates	Article 6 {1} {f} – legitimate interest
Direct Marketing	Article 6 {1} {a} - consent

If you agree, Our Company will share your data with our partner companies so that they may offer you their products and services. You can opt out of this type of processing at any time notifying us at info@vaughans.co

When Our Company processes your data, it may send your data to and also use the resulting information from, credit reference agencies (CRAs) to prevent fraudulent purchases.

The identities of the CRAs, their role also as fraud prevention agencies, the data they hold, the ways in which they use and share personal information, data retention periods and your data protection rights

with the CRAs are explained in more detail in the CRA information notice (CRAIN) which is accessible [here](#).

How do we store your data?

Our Company securely stores your data with Clearcourse Business Services Limited who is our chosen IT platform provider plus your data is securely held on our Microsoft One Drive and within Microsoft Outlook.

Data Location	Security
Microsoft Outlook	Microsoft office security link
CRM system	https://www.brightoffice.co.uk/privacy/
Microsoft OneDrive	Microsoft OneDrive security link

We will only keep personal data for as long as necessary for the purposes for which it was gained and only where we continue to have a legal basis for doing so. Our Company will keep your different categories for different types of data for 6 years. Once this time period has expired, we will delete your data.

Data Type	Duration	Data Deletion Method
Personal identification information	6 years	Data deletion
Contact information	6 years	Data deletion
Special category data	6 years	Data deletion
Financial information	6 years	Data deletion

Marketing

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.

You have the right at any time to stop Our Company from contacting you for marketing purposes or giving your data to other members of the Our Company Group. Please contact info@vaughans at any time to update your marketing preferences.

What are your data protection rights?

Alfred Vaughan & Co Limited understands that with the introduction of the Consumer Duty, it is likely the level of communications issued by our business 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 make sure you are fully aware of all of your data protection rights. Every user is entitled to the following:

The right to access – You have the right to request Our Company for copies of your personal data. We may charge you a small fee for this service.

The right to rectification – You have the right to request that Our Company correct any information you believe is inaccurate. You also have the right to request Our Company to complete the information you believe is incomplete.

The right to erasure – You have the right to request that Our Company erase your personal data, under certain conditions.

The right to restrict processing – You have the right to request that Our Company restrict the processing of your personal data, under certain conditions.

The right to object to processing – You have the right to object to Our Company's processing of your personal data, under certain conditions.

The right to data portability – You have the right to request that Our Company transfer the data that we have collected to another organization, or directly to you, under certain conditions.

If you make a request, we have one month from the point of receipt to respond to you. If you would like to exercise any of these rights, please contact us at our email:

andy.thrower@vaughans.co

Or write to us:

Olympic Court
Whitehills Business Park
Blackpool
Lancashire
FY4 5GU

Cookies

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, visit www.allaboutcookies.org.

How do we use cookies?

Our Company uses cookies in a range of ways to improve your experience on our website, 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 uses:

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

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

Third Party - Our site, like most websites, includes 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
Linkedin
Twitter

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

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

Visitor Statistic - We use cookies to compile visitor statistics such as how many people have visited our website, 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.

How to manage cookies

You can set your browser not to accept cookies, and the above website 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.

Privacy policies of other websites

Alfred Vaughan & Co Limited's website contains links to other websites. Our privacy policy applies only to our website, so if you click on a link to another website, you should read their privacy policy.

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 identification	To assist in identifying patterns, trends, discrepancies or inconsistencies in 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 our Principal 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's Privacy Policy, the data we hold on you, or you would like to exercise one of your data subject rights, please do not hesitate to contact us.

Email us at: andy.thrower@vaughans.co

Call us on : 0330 1222 247

How to contact the appropriate authority

Should you wish to report a complaint or if you feel that Our Company has not addressed your concern in a satisfactory manner, you may contact the Information Commissioner's Office at www.ico.org.

****END****