

Finance Compliance

How to be compliant when marketing your finance options

The FCA imposes strict guidelines when it comes to advertising/ promoting consumer credit.

The purpose of these guidelines is to ensure financial promotions are fair, clear and not misleading, give a balanced impression of the product or service and not disguise or diminish important warnings or statements.

The APR offered to your customer will vary depending on their circumstances and credit history, therefore we would not normally recommend that you advertise any APR or repayment amount as this may not be a true reflection of the offer every customer will receive.

Our research has shown that most customers will not ask about finance unless they see it being advertised. It is therefore important that you promote that finance is available on a regular basis to drive new enquiries.

As part of your agreement, we will review your financial promotions to confirm compliance with regulatory guidelines.

Pre-application checks

When one of your customers expresses an interest in applying for finance, you can ask the following pre-qualifying questions before the application is processed:

- Are you in employment? (Full time preferable)
- What is your annual income? (MINIMUM requirement of £7,200p/a)
- How is your credit?

It is always worth asking these questions as a minimum prior to a customer making an application as this will give you an idea of who is more likely to be accepted.



Finance Compliance

PRE-APPLICATION CHECKS CONTINUED...

Our rates start from 3.4% APR but the actual rate offered will always depend upon the applicants circumstances and credit history.

This means that for anyone with adverse credit or other risk factors, the rate they are offered will be higher.

You should not discuss interest rates and terms with your customer or complete any finance application on their behalf.

We cannot determine the interest rate that will be offered until an application has been submitted in full. a soft credit search is conducted, this is not visible to other lenders and allows us to obtain quotes from our panel. The offer with the lowest APR is then returned to the customer.

NO CONTACT PROCESS

Once we receive an application it is added to a callback queue to be contacted within 24 hours.

Over 5 consecutive days, there will be numerous different attempts to contact the applicant:

Day 1 - Day 5 - We attempt to call your customer, if there is no answer we always leave a voicemail where possible.

We aim to call the applicant at 3 different times of day (Morning/ Afternoon/Evening).

This way the chance of establishing successful contact with your customers is higher.

Day 1/ Day 3 / Day 5 - As well as the above process, on these lays we also send the customer a follow-up email and text. Thi ensures that all possible avenues and opportunities to contact the customer are covered.



Finance Compliance

WHY PROMOTING YOUR FINANCE OPTIONS ON SOCIAL MEDIA IS IMPORTANT

Where better to promote our finance options than where we spend more than 25 percent of our online time: social media.

When sharing content, utilise the customisable posting features on each social media platform. The more optimised your post is for a particular platform, the more effective your social media promotion will be.

For example, when you share a link to Facebook you have the opportunity to create a post that truly stands out. All you need is an attention-grabbing headline, a clean, relevant image of your product, and a short, compelling description about our finance options. Finance can be difficult to write about so here are some common phrases used by our customers:

- Finance available
- Monthly repayment options
- Payment options
- Alternative payment options
- Monthly payments
- Spread the cost
- Affordable payment options
- Payment plan available

It is mandatory that you send us all adverts for FCA compliance approval.



Finance Marketing Do's & Don'ts (For Approved Sellers – Keep for Reference)

V DO

- 1. Only use approved marketing materials
 - Use the finance leaflets, posters, or templates provided by T&S Water Co. Ltd.
 - If you want to create your own, it must be approved by us before use.
- 2. Pass on customer details with consent
 - Get clear permission from the customer before sharing their details with us.
 - Use the approved finance referral form or secure online submission process.
- 3. Tell customers the truth about finance
 - You are not the lender.
 - All decisions are made by the finance provider.
 - Finance is subject to status and affordability checks.
- 4. Display finance information passively
 - You can display approved posters, leaflets, or banners in your office, stall, or event stand.
- 5. Keep records
 - Maintain a simple log of customer finance enquiries and the date they were referred.

X DON'T

- Don't give financial advice
 - Never recommend whether someone should or shouldn't take finance.
- Don't discuss loan details
 - You must not talk about APR, interest rates, repayment terms, or lender requirements.
- Don't complete finance applications for the customer
 - They must fill in the application themselves. You may only guide them to where it can be completed.
- Don't alter approved marketing materials
 - Changing wording, numbers, or logos could make the promotion non-compliant.
- Don't promise approval
 - Approval is never guaranteed. Only the finance provider can decide.

Remember:

Your role is to introduce the customer to the finance option - not to sell the finance itself.

Any breach of these rules could result in your finance access being withdrawn without refund.