

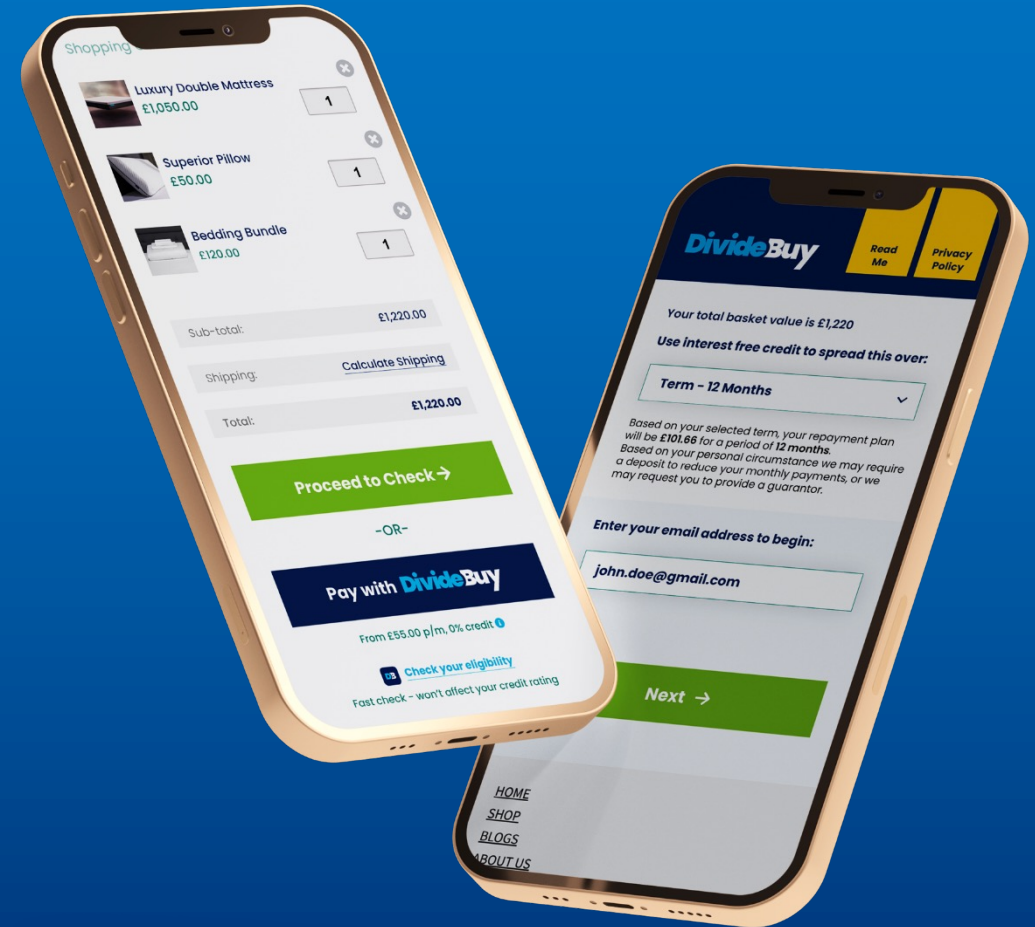
Financial Promotions - Merchant Induction

Our products and how to introduce them to your customers

Our team is united in their mission to lead the way towards *simple, fair* and *honest* point-of-sale finance.

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Our Products

Our retail finance solution, DivideBuy, lets you offer customers a range of regulated and unregulated interest free and interest bearing finance products, from 3-60 months and up to £25,000.

Your customer's will pay an initial instalment, with a recurring card payment collected monthly until their balance is paid. We run a hard credit check on all applications made and the customer must meet our eligibility criteria to be considered for credit.

Customers can manage their account online and make additional payments. DivideBuy puts your customer in control and treats them fairly, with transparent terms and an ethical focus.

We require you, as a Merchant introducing our product, to follow specific rules around how the product is offered, how you discuss our products with mutual customers, and how our mutual customers are treated.



Eligibility

Please see below the eligibility criteria for the product we offer:

- Permanent UK resident
- Hold a UK bank account
- Over 18 years of age
- An accepted debit card registered to your home address
- Valid UK mobile telephone number
- Valid Email address

It is important to note that eligibility for credit does not mean the customer is guaranteed to be accepted for a loan.

Make customers aware credit checks can have an impact on applying for credit in the future – particularly if the application is rejected and if multiple checks are made in a short period of time.



Do's and Don'ts

Here are some key points to be aware of when talking to customers about our Product:

Do

- Explain that you offer DivideBuy finance
- Refer customers to our website as dividebuy.co.uk
- If you're unsure about a question, please speak to your account manager at DivideBuy
- Keep up to date with our current finance and new products

Don't

- Mislead the customer in any way about our products
- Offer options/guide customers on what products are right for them
- Try to answer a question from a customer if you are unsure. It is okay to check the facts before answering any questions.

The Compliance Process

Although the point of sale is an incredibly important part of the customer journey, it is vital to remember that every interaction your customers have with you, and indeed us, form part of the overall customer journey.

A compliant sale is just the start of meeting our collective obligations and ensuring the customer is treated fairly.

DivideBuy puts the customer first in everything we do - and we expect our Merchants to do the same.



Consumer Law

The Consumer Rights Act came into force 1 October 2015. It aims to make the law clearer and easier to understand, so that consumers can buy, and businesses can sell to them, with confidence. On the rare occasions when problems arise, they will be able to resolve disputes quickly and cheaply.

This is relevant to both Merchants and consumers that use DivideBuy. Transparent rights help consumers make better choices when they buy, generating the opportunity for businesses to compete, innovate and grow.

There is some very simple wording you as a business can use to raise awareness of Consumer Rights for your customers, which has been agreed by business and consumer groups. This can be found on the Business Companion website . It can be displayed to help staff and customers understand rights regarding what should happen when purchases are faulty or not of a suitable standard.

Good customer outcomes are key to DivideBuy's culture, and we put the customer at the heart of everything we do. We have added some information on the next page to help you understand your responsibility as a business to our mutual customers.



Consumer Law – Sales & Supply of Goods

Implied Terms – CRA implies certain terms into the contract between the merchant and the consumer. The goods must be of satisfactory quality – must be of a standard that a reasonable person would regard as satisfactory.

“Quality” covers things like:

- Fitness for purpose
- Appearance and finish
- Freedom from minor defects
- Safety
- Durability
- A repair or replacement should be offered if a product is faulty more than 30 days after purchase/delivery. Of course, this only applies if the product was supposed to last longer.

When assessing quality, all the relevant circumstances must be considered including price, description and any advertising by the trader.

- Be fit for purpose. If the consumer indicates the goods are required for a particular purpose or where it is obvious the goods are intended for a particular purpose, they must be fit for that purpose
- Match any description, sample or model
- Be installed correctly where installation has been agreed as part of the contract

Complaints

What is a complaint about finance?

Examples of common complaints are:

- A customer makes a complaint about a finance product
- A customer makes a complaint about how a Merchant has introduced the finance product to them
- A complaint about a financial promotion e.g a misleading online advert featuring a financial product

How do you handle a complaint about finance?

If you identify a complaint in relation to the finance you offer via DivideBuy, please see the short summary below. Always read and follow our Complaints Policy, which can be found on the Merchant portal. If you need further assistance with the complaint, you can speak with our Customer Service Team complaints@dividebuy.co.uk

- If the complaint is about the finance product, you would take the complaint information and refer this to DivideBuy in writing. You would also provide the customer with the DivideBuy's contact details and record that you have referred the customer to us.
- If the complaint is about your introduction of the product to the customer, or one of your financial promotions, you should record and try to resolve the customers complaint using your complaints procedure – and also inform DivideBuy of the complaint and resolution.



Vulnerable Customers

DivideBuy wants to ensure vulnerable consumers experience outcomes as good as other consumers and receive consistently fair treatment. When dealing with vulnerable customers, you should identify the type of vulnerability the customer is suffering and put in place measures to assist the customer where possible. You have a duty to treat all customers fairly and, in respect of vulnerable customers, to treat them with respect and an extra level of care.

The FCA's view of vulnerability is as a spectrum of risk. All customers are at risk of becoming vulnerable, but this risk is increased by having characteristics of vulnerability, related to four key drivers:

- Health – health conditions or illnesses that affect ability to carry out day-to-day tasks
- Life events – for example, bereavement, job loss or relationship breakdowns
- Resilience – low ability to withstand financial or emotional shocks
- Capability – low knowledge of financial matters or low confidence in managing money. Low capability in other relevant areas such as literacy or digital skills could also be a driver for vulnerability.

We expect all our Merchants to have a vulnerable customers policy / process. Your account manager will ask to view this periodically to ensure you are meeting the standards our customers expect.

Characteristics of vulnerability may result in consumers having additional or different needs, and may limit their ability or willingness to make decisions and choices or to represent their own interests. Therefore, these consumers may be at greater risk of harm, particularly if things go wrong.

Keep in mind the various means of communication available to you from DivideBuy to assist customers with various types of vulnerability.

- **Call us and leave a message for a call back from Customer Service**
- **Apply for products online**
- **Take away key information on financial products (note that these are available in braille and in larger fonts for people with visual impairments)**
- **Chat with customer services using our live webchat**
- **Email us via the website or use our help and support page on the website**

Treating Customers Fairly

The FCA has defined six consumer focused outcomes that firms are required to implement. We expect our Merchants to have a top-down approach to Treating Customers Fairly (TCF) that ensures business activities align with the six customer outcomes noted below .

Outcome 1

Consumers can be confident that they are dealing with firms where the fair treatment of customers is central to the corporate culture.

Outcome 2

Products and services marketed and sold in the retail market are designed to meet the needs of identified consumer groups and are targeted accordingly.

Outcome 3

Consumers are provided with clear information and are kept appropriately informed before, during and after the point of sale.

Outcome 4

Where consumers receive advice, the advice is suitable and takes account of their circumstances.

Outcome 5

Consumers are provided with products that perform as firms have led them to expect, and the associated services is of an acceptable standard and as they have been led to expect.

Outcome 6

Consumers do not face unreasonable post-sale barriers imposed by firms to change product, switch provider, submit a claim or make a complaint.

Treating Customers Fairly

For our customers to be confident that TCF is central to our corporate culture, we:

- Conduct due diligence on our Merchants to ensure they act appropriately with our customers and do not engage in any unethical practices
- Ensure that our commercial arrangements with third parties do not create incentives to sell products to customers inappropriately, for example, through the use of commission structures
- Have in place a policy on Treating Customers Fairly
- Ensure we have appropriate policies and procedures in place to guarantee the fair treatment of customers. For example, a complaints handling policy to ensure that all complaints are handled appropriately, and a financial promotions policy to ensure that all financial promotions and communications with customers are fair, clear and not misleading
- Provide training to all staff to ensure they understand their obligation to treat customers fairly.

We expect all our Merchants to Treat Customers fairly and train their staff appropriately. As previously mentioned, we conduct due diligence on our Merchants as part of our TCF policy. Your account manager will incorporate this into the review that they have with you.



Financial Promotions

As a Merchant, you may want to promote our finance product in your adverts. This is called a financial promotion – and there are specific rules you will need to follow.

By using our approved marketing templates and following our Financial Promotions Guide, your promotion will be considered approved by DivideBuy. If you amend any wording or do not follow our Financial Promotions Guide, your promotion does not have DivideBuy's approval.

How our mutual customers are engaged is important to DivideBuy. If you don't have the same culture of compliance and customer-first, we may need to review our relationship. DivideBuy will monitor financial promotions across all media and are obligated to log any instances of non-compliance.

Merchants will be required to remove or update non-compliant Financial Promotions in order to avoid breaching their contractual obligations with DivideBuy. If a Merchant does not take the required steps to remedy the non-compliant financial promotion, DivideBuy may be required to terminate the agreement.

Our Financial Promotions Guide and marketing templates can be found here (link to be inserted)

If you wish to advertise our products, we always recommend that you review our Financial Promotions Guide. If you have any questions, get in touch with your account manager, who will gladly provide any support required.

We expect all our Merchants to Treat Customers fairly and train their staff appropriately. As previously mentioned, we conduct due diligence on our Merchants as part of our TCF policy. Your account manager will incorporate this into the review that they have with you.



Reviews

As the lender, we must oversee and carry out due diligence of Merchants introducing our products to customers.

This means we'll complete reasonable checks to make sure you are meeting the expected standards to introduce our finance products.

Your account manager will meet with you at least annually to do the following:

- Ensure all staff have read and understood this guide and their obligations
- Review your policies and procedures
- Review your financial promotions
- Review your procedures for dealing with vulnerable customers
- Review your business performance.

You should keep accurate records of the above for at least six years.



DivideBuy
Thank You

Contact Us

If you have any questions, please contact us using one of the methods below:

Email us at retailersupport@dividebuy.co.uk

Tel +44 (0)1782 491627 selecting option 2