



Don't Forget the Footer

Omni's guide to website homepage requirements for retailers offering credit

For Retailer Use Only

Introduction

A website is an essential part of any retailer's sales strategy. It's the digital shop window for your products and services.

If, however, you are offering credit to help purchase your products or services the website must also give the customer all of the information they need, which in many cases is also required by legislation, regarding the credit that is being made available.

In order to achieve this, your homepage needs to contain the information shown on the following pages. The best place to display this is normally in the page footer.



Information about the retailer

- You should show your legal entity, your company registration number, and your registered company address.

• **Why?** This helps provide the customer with confidence that they are dealing with a bona fide business, and enables them to conduct further checks before they make a purchase, if they want to.

- You should provide a link to your own Terms & Conditions – you might display these on a different page on the website, and/or you might provide access to a downloadable copy.

• **Why?** Some purchases require more advance research by the customer than others; making your Terms & Conditions readily available to the customer shows that you have nothing to hide, and that you want to provide them with all appropriate information before they commit to their purchase.

- If your trading name or style differs to your registered company name, make that clear on your website. If you are authorised by the FCA to provide credit (see below), your entry on the FCA register must also reflect this.

• **Why?** The customer needs to be clear on who is acting as a broker for their credit agreement. If you trade under a different style to your registered name, the customer needs to be able to recognise and understand this.



Information about your regulatory status

If you offer credit, you will either do this on a regulated or unregulated basis. Your credit provider will help you understand whether you need to be regulated or not, depending on the type of credit you are making available to your customers.

- If you are not FCA authorised, you should include a statement along these lines:
 - [Retailer Name] is acting as a credit broker offering finance from [Company Name] (or [Company Names] if there is a second line lender). Credit is subject to status.

• **Why?** *The customer needs to be clear on who is providing the credit, and understand that a successful application for credit is dependent on their status and circumstances.*

- If you are FCA authorised, you should include a statement along these lines:
 - [Retailer Name] is authorised and regulated by the Financial Conduct Authority, registration number [Insert Number], and is acting as a credit broker offering finance from [Company Name] (or [Company Names] if there is a second line lender). Credit is subject to status.

• **Why?** *The customer needs to see confirmation that you are authorised and regulated by the appropriate organisation, be clear on who is providing the credit, and understand that a successful application for credit is dependent on their status and circumstances.*

Information about the credit provider

- Provide clear access to the Credit provider's Terms & Conditions.

• **Why?** *The customer needs to be able to get full information about the credit agreement, for example their cancellation options, and whether fees may be payable under any circumstances.*

Website footer example

Here is an example of a website footer that would meet Omni Capital Retail Finance's minimum recommendations. In this instance, the footer is appropriate for a regulated retailer, whose trading name and registered company name are the same, offering credit from a single credit provider:

Retailer name is registered in England and Wales with company number **Company Registration Number**. Registered address: **Registered office address**. Terms and Conditions can be found at **www.retailerwebsite.co.uk/terms**. **Retailer name** acts as a credit broker and offers credit products from Omni Capital Retail Finance. **Retailer name** is authorised and regulated by the Financial Conduct Authority, registration number **FCA Registration Number**. Your application will be subject to a credit check using a recognised credit reference agency as part of our assessment process. Credit is subject to status, and is limited to UK residents aged 18 years and over. You can find Omni Capital Retail Finance's Terms and Conditions at **www.omnicapitalretailfinance.co.uk**

Finance is provided by Omni Capital Retail Finance Ltd which is a credit provider/lender. **Retailer name** does not receive payment for introducing customers to Omni Capital Retail Finance. Omni Capital Retail Finance Ltd finance options are subject to individual status, and terms and conditions apply. Omni Capital Retail Finance Ltd is registered in England and Wales with company number 7232938. Registered address: 10 Norwich Street, London, EC4A 1BD. Authorised and regulated by the Financial Conduct Authority, Firm Reference Number: 720279.

Important note

Regulatory guidance and legislative requirements are subject to change, and can be open to interpretation. The content of this document should therefore be seen as Omni Capital Retail Finance's minimum recommendations for retailer websites that are providing access to Omni's credit services, based on our interpretation of guidance and requirements at the time this document was produced, and should not be relied upon to be comprehensive, or reflective of the latest guidance or legislation. Castle Trust Bank and Omni Capital Retail Finance cannot be held responsible should the disclosures on your website subsequently be deemed incorrect, or insufficient. If in any doubt, please consult with an appropriate professional Compliance or Legal service provider.



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Omni Capital Retail Finance is a member of the
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