

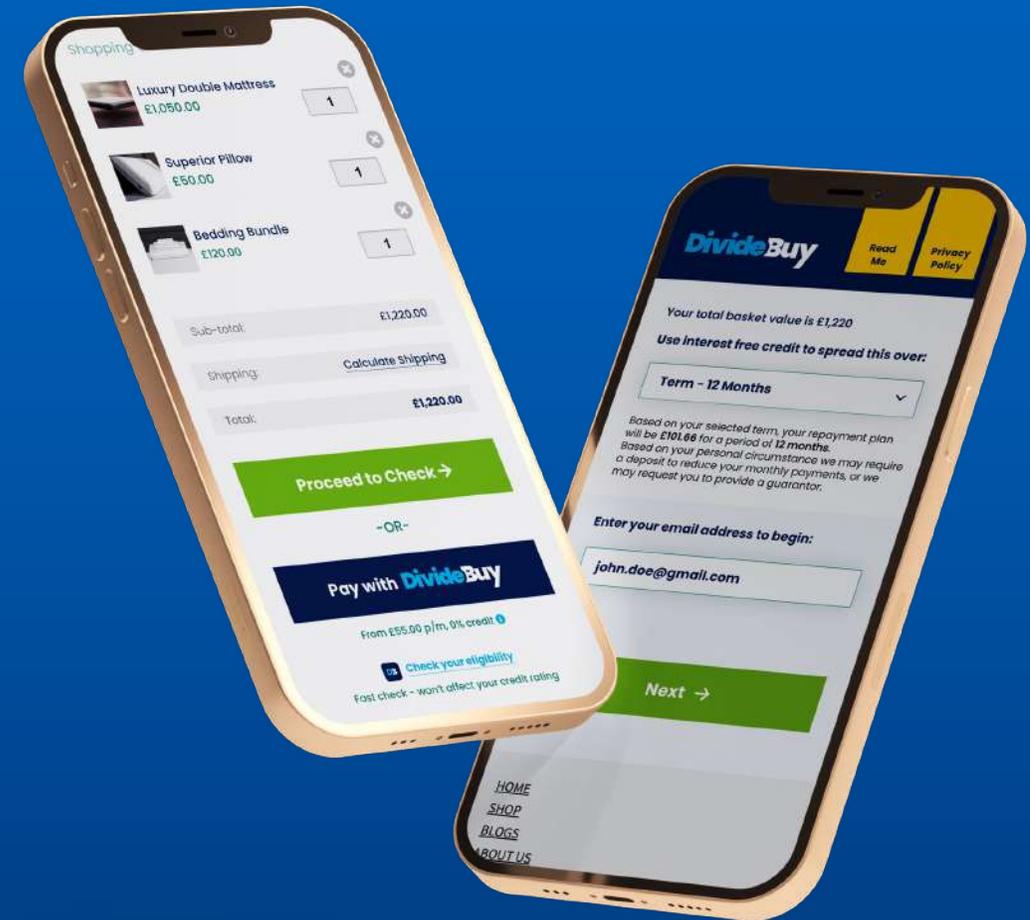
# Financial Promotions Guideline

Your guide to creating compliant financial promotions

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

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# Introduction

## What Is A Financial Promotion?

The Financial Conduct Authority (FCA) defines a financial promotion as ‘an invitation or an inducement to engage in an investment activity that is communicated in the course of a business’

## In other words, it means any advertisement about financial products or services.

This includes anything that promotes, invites or seeks to persuade a customer to take out a credit product such as:



**Printed Adverts**



**Social Media**



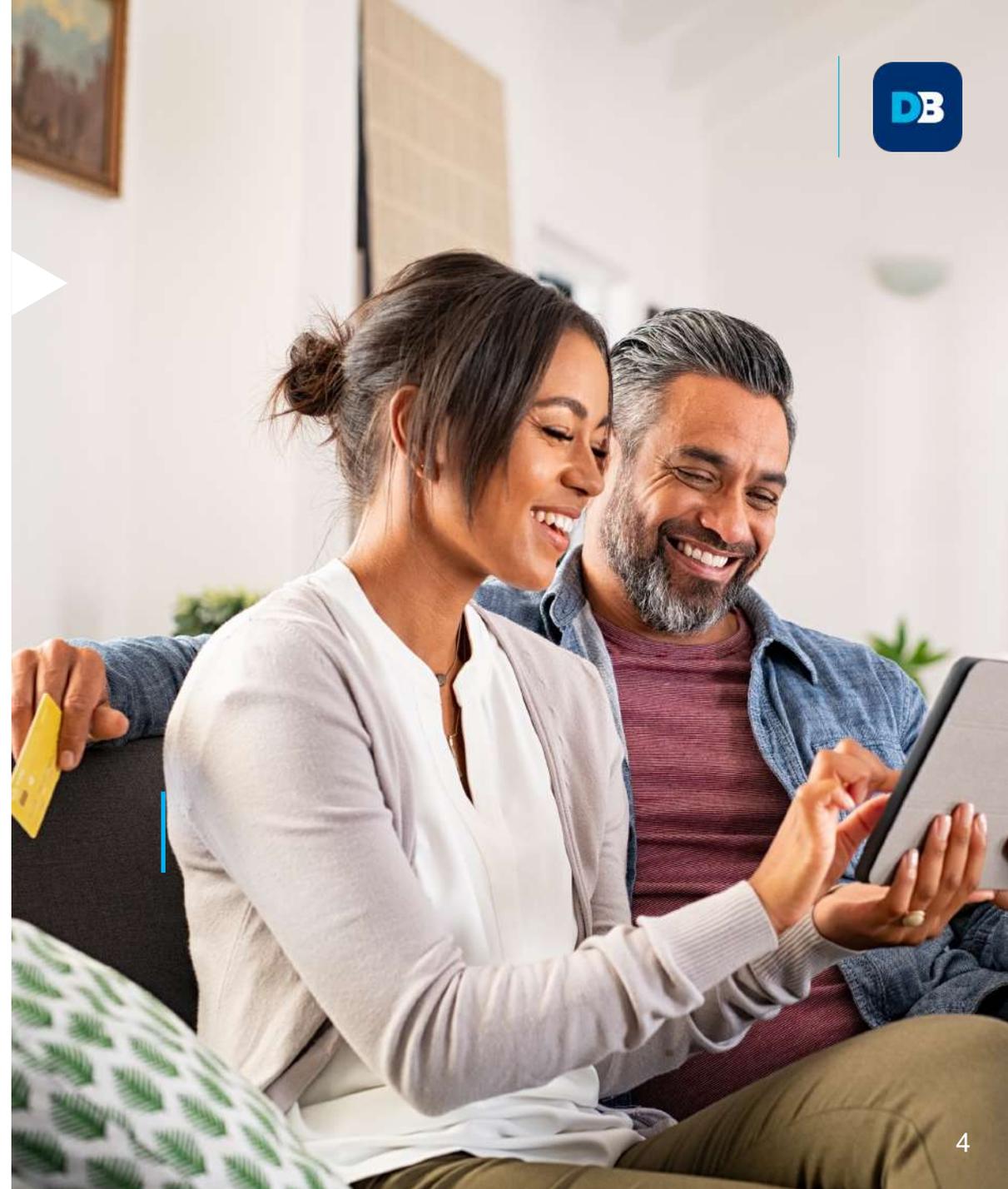
**Brochures**



**Conversations with customers i.e ‘Real-time financial promotions’**



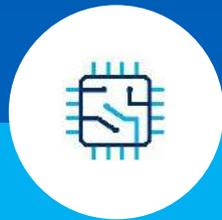
**Websites**



# Introduction

## Why Do Financial Promotions Matter?

Attracting and keeping customers is important to our business. But in addition to the commercial benefits, we also need to understand the conduct risks:



1.

A Promotion may be the only source of information on which customers base their decision. It is important that we give the customer the right information at the right time and treat them fairly.



2.

If the customer chooses an unsuitable product, the potential for harm is greater due to the complex and often long term nature of financial products.



3.

It's the law. We must pay due regard to the information needs of customers, and communicate with them in a clear, fair and non-misleading way. The FCA consider materially misleading advertisements as a criminal breach of the Consumer Protection from Unfair Trading Regulations 2008.





## Who Is Responsible?

The Marketing, Social Media and Consumer Financial Services teams designing and approving the promotions.

The Risk & Compliance Team who sign off on promotions.



## Rules And Guidance

Use the Financial Promotions checklists when creating a promotion. This provides the information you require in a promotion



## What Are The Key Requirements?

The overarching ASA and FCA requirements are for all adverts which we'll delve deeper into on the next slide.



## Overarching requirement

**The overarching requirement is to be clear, fair and not misleading. To do this, you must ensure each promotion:**

- Is clearly identifiable as an advert
- Is accurate, factual and truthful
- Is balanced and suitable for the end customer
- Uses plain, easy-to-understand information (NO Jargon)
- States our company name and that we are a Lender
- Clearly states the name of the lender
- Does not state credit is available regardless of a customer's circumstances
- Does not disguise/omit/diminish/obscure any important information



## Unfair Practices

**Examples of misleading or unfair practice include:**

- Misleading about the availability of a credit product
- Suggesting credit is pre-approved or guaranteed
- Concealing or using a misleading company name
- Using false or exaggerated claims, endorsements, case studies or examples

# Disclosures



## When advertising our credit products, you must include the relevant disclosures which state:

- That we are a lender
- The nature of the service we are providing
- The legal name of our company Zopa Embedded Finance Ltd t/a DivideBuy
- Statutory status disclosure





**Get this amazing diamond ring from just £XX per month with interest free credit.**

**Cash price £XX.**

[FIND OUT MORE](#)

Credit subject to Minimum spend of £xx and minimum deposit of xx%. ABC Limited credit agreements are not regulated by the Financial Conduct Authority and do not fall under the jurisdiction of the Financial Ombudsman Service. Credit is available to permanent UK residents aged 18+, subject to status, any missed payments may affect your ability to obtain credit from ABC Limited and other lenders. Please spend responsibly.

## Non-regulated Disclosure Example

Credit subject to Minimum spend of £xx and minimum deposit of xx%. ABC Limited credit agreements are not regulated by the Financial Conduct Authority and do not fall under the jurisdiction of the Financial Ombudsman Service. Credit is available to permanent UK residents aged 18+, subject to status, any missed payments may affect your ability to obtain credit from ABC Limited and other lenders. Please spend responsibly.

# Representative APR



## What is a Representative APR?

The representative APR will be the **Annual Percentage Rate** of the product you are advertising.

### When is a Representative APR needed?

A Representative APR must be included if the promotion includes either:

- **An invitation or incentive to apply for credit**

Or

- **A comparison is made with another product, firm or service**

## Common Triggers

### Invitations

- Apply Now
- Click here to apply
- Spread the cost

### Incentives

- Quick, easy application
- No deposit required
- Limited offer

### Comparisons

- Competitive finance options



**ABC LIMITED**

This beautiful diamond ring could be yours from as little as **£XX** per month for **36 months**

Finance available on all watches and rings.

**Representative Example:**

Price: £XX	Representative: 19.9% APR
Deposit: £XX	Monthly repayment: £XX
Amount of credit: £XX	Total term: 36 months
Interest rate: 19.9% p.a. fixed	Total amount payable: £XX

Get this from **£xx** Per Month

**BUY NOW**

## Regulated Disclosure Example

Credit subject to Minimum spend of £xx and minimum deposit of xx%. ABC Limited 1 Baker Street, London, E1 3HG (FRN 123456) are authorised and regulated by the Financial Conduct Authority. We are a credit broker not a lender. Credit is provided by XYZ Ltd 4 Baskerville Road, London E17 7DF (FRN 67894). Credit is available to permanent UK residents aged 18+, subject to status, any missed payments may affect your ability to obtain credit from XYZ Ltd and other lenders. Please spend responsibly.

Credit subject to Minimum spend of £xx and minimum deposit of xx%. ABC Limited 1 Baker Street, London, E1 3HG (FRN 123456) are authorised and regulated by the Financial Conduct Authority. We are a credit broker not a lender. Credit is provided by XYZ Ltd 4 Baskerville Road, London E17 7DF (FRN 67894). Credit is available to permanent UK residents aged 18+, subject to status, any missed payments may affect your ability to obtain credit from XYZ Ltd and other lenders. Please spend responsibly.

# Representative APR

## When is an APR not required?

The Representative APR is not required where the APR of the advertised product is 0%. This means the finance must be entirely free of interest or charges to apply.

## Image advertising exception

The Representative APR is not required where the advert only includes:

- A trading name or logo
- A contact point

Brief, factual descriptions of the credit products or services, for example:

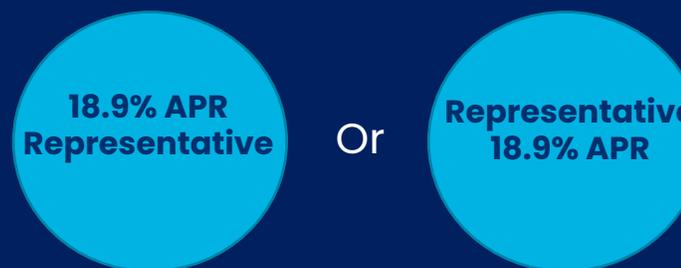
- 'Finance available. Ask for details'
- 'Finance options available- click here to find out more'

## How Representative APR Needs To Be Shown

The Representative APR needs to be in the main body of the advert near the invitation, incentive or comparison.

It must be accompanied by the word 'representative' and the value needs to be to one decimal place.

## Example



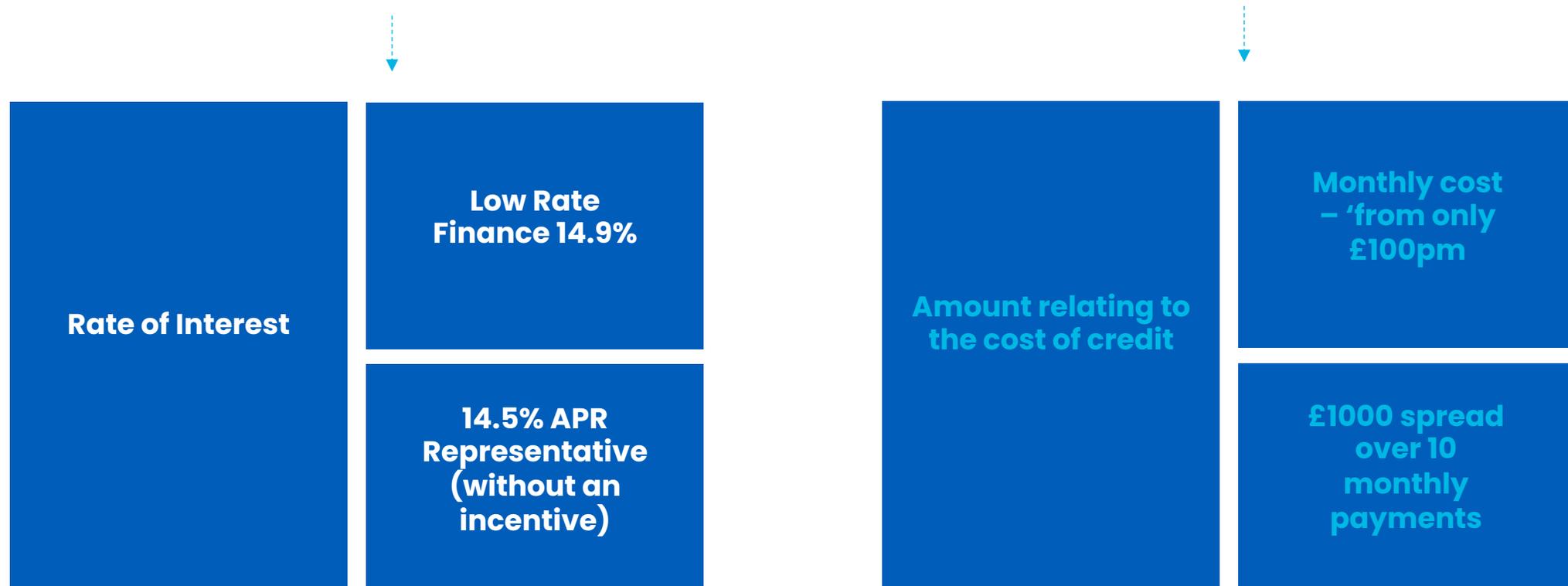
*A Representative APR on its own without an invitation, incentive or comparison would trigger a full representative example, so remember to include an invitation, incentive or comparison if space is limited*

# Representative Examples

## When is a representative example required?

The purpose of providing a representative example is to show the customer what their repayment plan is likely to look like.

**There are two key pieces of information that trigger the need for a representative example.**



# Representative Examples



## What information needs to be included in a Representative Example ?

The Representative Example must be positioned no less prominently than the trigger, and needs to contain the following information:

- Cash price of goods
- Deposit or advance payment
- Amount of credit
- Interest rate – displayed as X.X% p.a. fixed
- Representative APR
- Term in months
- Amount and number of monthly payments
- Total amount payable

**It must be labelled 'Representative Example' and each piece of information must be given equal prominence, which means you cannot highlight some information over others.**



# Format and Layout

## Prominence

A common theme throughout the FCA and ASA guidance and rules is a focus on prominence of important information, key risks, required regulatory wording or statements.

Prominence can be subjective, and a range of factors must be considered when designing the promotion. These include:

- Type of media, screen size, page breaks etc
- Font size, colour, bold, italics and the background which the text is shown against
- How information is presented using borders tables, columns etc
- Design, layout and structure

**In order to draw a customer's attention to important information, consideration should be given to the following:**

### Do



- Use bold or large font that is no smaller than the font used to highlight benefits of a product
- Use text of a different colour so that it stands out from the rest of the information provided in the promotion
- Show important information (e.g risk warnings) in a box
- Position risk warnings and important information within the main body of the advert
- Display important information at the top and bottom of the promotion, so it is the first and last thing the customer will read

### Don't



- Under any circumstances display key information in a way that reduces its importance.
- Use light font on light backgrounds, or dark fonts on dark backgrounds, which makes it harder to read

# Interest Free Credit



Interest free credit is a popular product, as it enables the customer to spread the cost without paying any interest. However, you still need to make customers aware of key restrictions.



## Examples of restrictions

- ❖ Minimum spend
- ❖ If credit is only available on certain product lines
- ❖ Credit is subject to status and affordability

The General Requirements still apply, so you must also include the required Regulatory Disclosures.

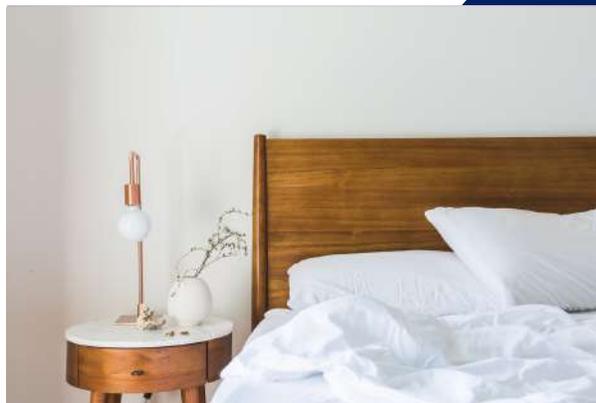


## Interest Free Credit

### Interest free credit on web digital banner

#### Good example

- The monthly cost does not trigger a Representative Example as the APR is 0%
- The cash price of the goods should also feature in the main body of the advert.



**Get this amazing furniture from just £XX per month with interest free credit! Cash price £XX.**

**FIND OUT MORE**

ABC Limited credit agreements are not regulated by the Financial Conduct Authority and do not fall under the jurisdiction of the Financial Ombudsman Service. Credit is available to permanent UK residents aged 18+, subject to status, any missed payments may affect your ability to obtain credit from ABC Limited and other lenders. Credit subject to Minimum spend of £xx and minimum deposit of xx%. Please spend responsibly.

#### Boiler plate text which includes:

- The legal name of the retailer
- A statement that credit is subject to status and affordability
- A statement that finance is subject to a minimum spend of £300
- A statement that a minimum deposit of 10% is required
- A prominent statement that the retailer is a credit broker and not a lender, and is authorised and regulated by the Financial Conduct Authority.
- Contact details not required where the ad features on the retailers website

## Interest Free Credit

### Interest free credit on web digital banner

#### Bad example

- The total cash price of the goods
- NOT included in the main body of the advert
- The monthly price does not reflect the goods depicted in the image.



**Get this amazing furniture today**  
**For just £XX a month**  
**Interest free credit available**

[FIND OUT MORE](#)

ABC Limited London are authorised and regulated by the financial conduct Authority. We are a credit broker not a lender

- Includes no reference to min spend



## What is a Financial Promotion?

A Financial Promotion is any advertisement about financial products or services.

This includes anything that promotes, invites, or seeks to persuade a customer to take out a credit product.

A Financial Promotion can come in many forms including brochures, point of sale material, websites, social media and many more. It can also include conversations you may have with customers



## What should I include in a Representative Example?

- Cash price of goods
- Deposit or advance payment
- Amount of credit
- Interest rate – displayed as X.X% p.a. fixed
- Representative APR
- Term in months
- Amount and number of monthly payments
- Total amount payable



## What counts as a trigger?

An invitation or incentive to apply for credit, or...

A comparison is made with another product, firm or service – including any implied comparisons

**Some examples of common triggers include:**

**‘Apply now’**

**‘Click here to apply’**

**‘Spread the cost’**

**‘Low rate finance’**

**‘No deposit required’**

## Useful Links

Below you will find links to our promotional assets library.

### Point-of-Sale

A range of banners, posters, leaflets, tent cards and more.

[View Assets](#)

### Display & Web Banners

A range of banners to use across your website, and digital display channels.

[View Assets](#)

### Social Media

A range of templates to use across Facebook, Instagram and LinkedIn.

[View Assets](#)

**DivideBuy**

# **Financial Promotions Asset Library**

---

# Website Banners IFC



When using these banners on your website, you will need to include this disclosure example on the same page as the banner

Zopa Embedded Finance Limited t/a DivideBuy credit agreements are not regulated by the Financial Conduct Authority and do not fall under the jurisdiction of the Financial Ombudsman Service. Credit is available to permanent UK residents aged 18+, subject to status, any missed payments may affect your ability to obtain credit from DivideBuy and other lenders. Please spend responsibly. Copyright © 2023 Zopa Embedded Finance. All Rights Reserved.



2048px X 1536px - [DOWNLOAD](#)



2040px X 1249px - [DOWNLOAD](#)



720px X 1280px - [DOWNLOAD](#)



2048px X 1536px - [DOWNLOAD](#)



2040px X 1249px - [DOWNLOAD](#)



720px X 1280px - [DOWNLOAD](#)



970px X 90px - [DOWNLOAD](#)



970px X 90px - [DOWNLOAD](#)

# Website & Display Banners IBC Templates

## Product



2048px X 1536px - [DOWNLOAD](#)



720px X 1280px - [DOWNLOAD](#)



2040px X 1249px - [DOWNLOAD](#)



970px X 90px - [DOWNLOAD](#)



160 X 600px - [DOWNLOAD](#)



300x X 600px - [DOWNLOAD](#)



200x-200px [DOWNLOAD](#)



300x250px - [DOWNLOAD](#)



1200x648px- [DOWNLOAD](#)

When using these banners on your website, you will need to include this disclosure and representative example on each of the banner templates

Zopa Embedded Finance Limited trading as Dividebuy is an appointed representative of Zopa Bank Limited which is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority, and entered on the Financial Services Register (800542 & 993200).

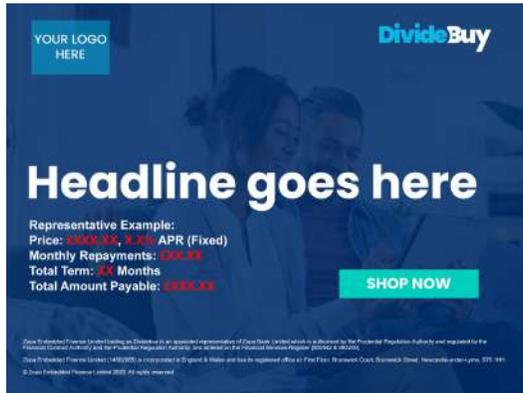
Zopa Embedded Finance Limited (14602085) is incorporated in England & Wales and has its registered office at: First Floor, Brunswick Court, Brunswick Street, Newcastle-under-Lyme, ST5 1HH.

© Zopa Embedded Finance Limited 2023. All rights reserved.

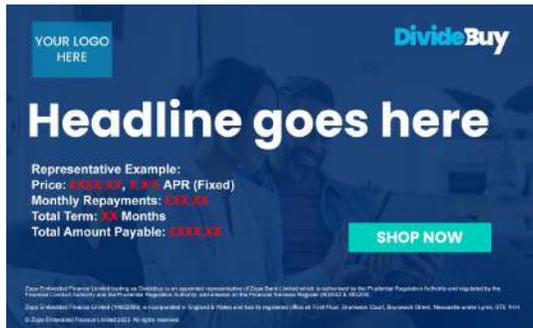
Representative Example:  
Price: **£XX**, 9.9% APR Fixed  
Monthly repayment: **£XX.XX**  
Total term: 48 months  
Total amount payable: **£X.XX**.

# Website & Display Banners IBC Templates

## Message



248px X 1536px - [DOWNLOAD](#)



240px X 1249px - [DOWNLOAD](#)



970px X 90px - [DOWNLOAD](#)



720px X 1280px - [DOWNLOAD](#)



160 X 600px - [DOWNLOAD](#)



300x X 600px - [DOWNLOAD](#)



200x-200px [DOWNLOAD](#)



300x250px - [DOWNLOAD](#)



1200x648px - [DOWNLOAD](#)

When using these banners on your website, you will need to include this disclosure and representative example on each of the banner templates

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Representative Example:  
Price: **£XX**, 9.9% APR Fixed  
Monthly repayment: **£XX.XX**  
Total term: 48 months  
Total amount payable: **£X.XX**.

# Display Banners IFC



2048px X 1536px - [DOWNLOAD](#)



2040px X 1249px - [DOWNLOAD](#)



720px X 1280px [DOWNLOAD](#)



2048px X 1536px - [DOWNLOAD](#)



2040px X 1249px - [DOWNLOAD](#)



720px X 1280px - [DOWNLOAD](#)



970px X 90px - [DOWNLOAD](#)



970px X 90px [DOWNLOAD](#)

## Prominence

As mentioned previously, the FCA places strong emphasis on having any disclosures on financial promotions clearly visible to readers. However, there are exceptions where DivideBuy may be mentioned, without the advertisement being considered a financial promotion.

### No Disclosure:

If you use one of the prompts below, it is not a Financial Promotion, and no disclosure is required:

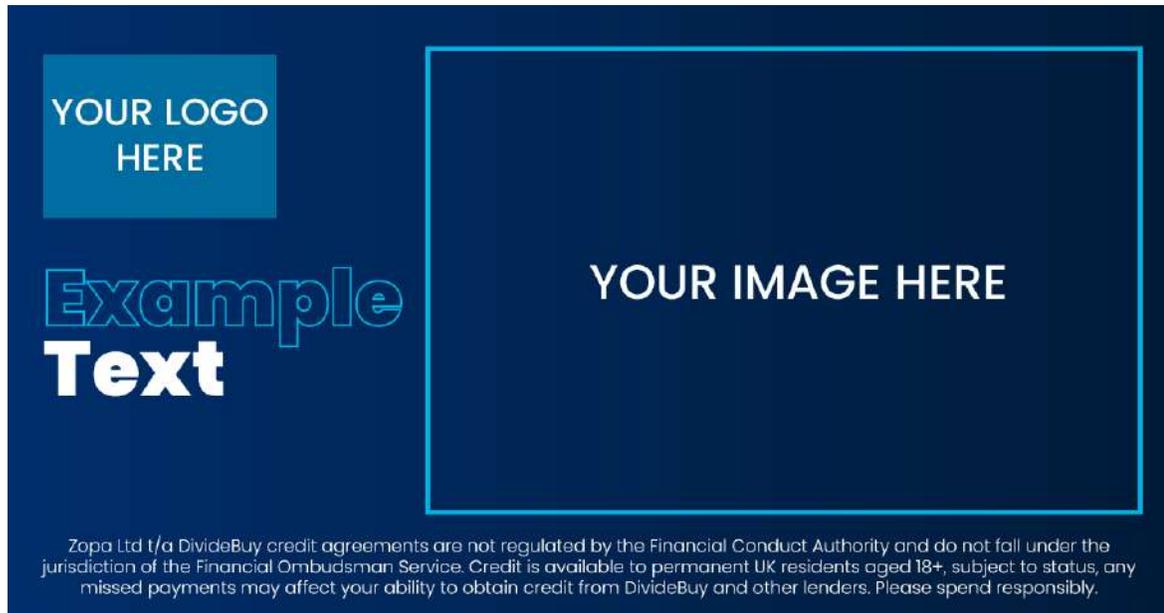
- DivideBuy available.
- DivideBuy available at checkout
- DivideBuy logo

### Disclosure Required:

Below is a list of PRE-APPROVED invitations to credit that will trigger the need to add the BNPL disclosure:

- Get more time to pay with DivideBuy
- Pay in instalments with DivideBuy
- Split your purchase with interest-free payments
- Shop now. Pay over time with DivideBuy
- Shop now. Pay with DivideBuy.
- Flex your payments
- Pay InStore with DivideBuy

## IFC Social Media – Facebook



From £50 p/m – Disclosure needed

### Facebook

Size: 1200px X 630px

Format: PSD

Download: [Link here](#)

When posting a financial promotion via Facebook, there are a number of points which you must factor in.

- You may only use the templates provided in the social media pack. No other social promotions are permitted.
- When referring to interest free credit, we ask that you only use those listed on slide 29
- Refrain from using images featuring prohibited products and services, including: adult entertainment, alcohol, drugs and tobacco, weapons, medical procedures, crypto, UV tanning equipment, spiritual or religious services, illegal/sensitive pharmaceuticals and pyramid schemes.
- All your posts must include this disclosure:
  - **Zopa Embedded Finance Limited t/a DivideBuy credit agreements are not regulated by the Financial Conduct Authority and do not fall under the jurisdiction of the Financial Ombudsman Service. Credit is available to permanent UK residents aged 18+, subject to status, any missed payments may affect your ability to obtain credit from DivideBuy and other lenders. Please spend responsibly. Copyright © 2023 Zopa Embedded Finance. All Rights Reserved.**

# IBC Social Media – Facebook



**Facebook Message Template**  
 Size: 1200px X 630px  
 Format: PSD  
 Download: [Link here](#)



**Facebook Product Template**  
 Size: 1200px X 630px  
 Format: PSD  
 Download: [Link here](#)

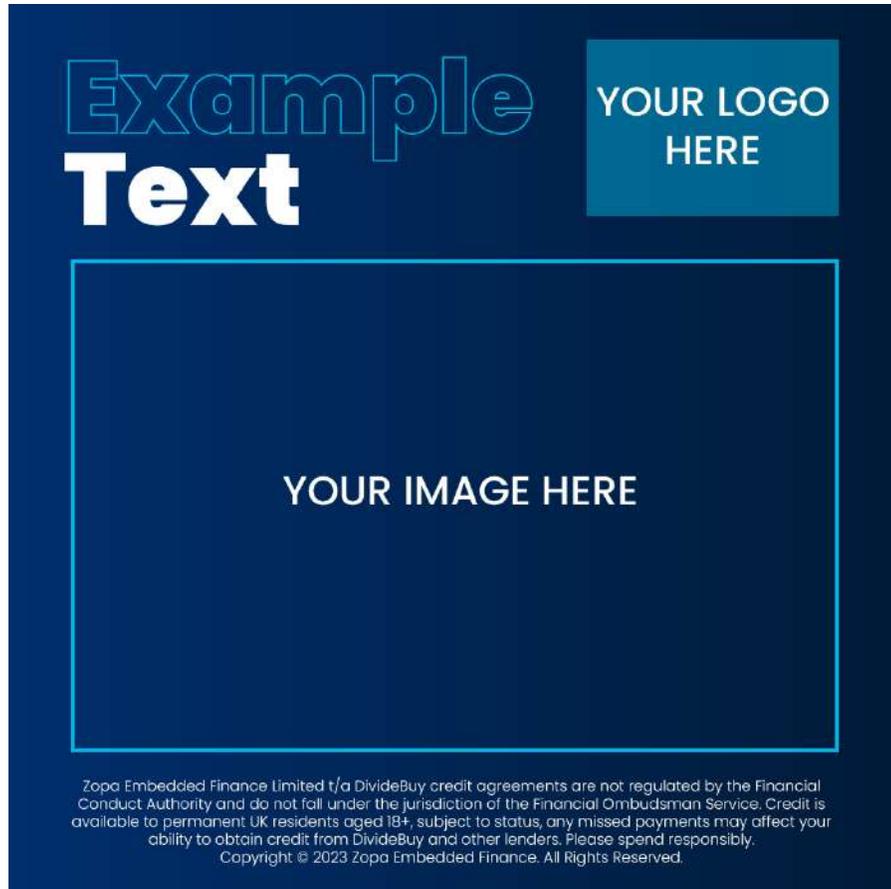
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- All your posts must include this disclosure:
 

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- All your posts must include this representative examples with and add the specific figures
 

**Representative Example:  
 Price: £XX, 9.9% APR Fixed  
 Monthly repayment: £XX.XX  
 Total term: 48 months  
 Total amount payable: £X.XX**

# IFC Social Media – Instagram



When posting a financial promotion via Instagram there are a number of points which you must factor in.

- You may only use the templates provided in the social media pack. No other social promotions are permitted.
- When referring to interest free credit, we ask that you only use those listed on slide 29
- Refrain from using images featuring prohibited products and services, including: adult entertainment, alcohol, drugs and tobacco, weapons, medical procedures, crypto, UV tanning equipment, spiritual or religious services, illegal/sensitive pharmaceuticals and pyramid schemes.
- All your posts must include this disclosure:
  - **Zopa Embedded Finance Limited t/a DivideBuy credit agreements are not regulated by the Financial Conduct Authority and do not fall under the jurisdiction of the Financial Ombudsman Service. Credit is available to permanent UK residents aged 18+, subject to status, any missed payments may affect your ability to obtain credit from DivideBuy and other lenders. Please spend responsibly. Copyright © 2023 Zopa Embedded Finance. All Rights Reserved.**

## Instagram

Size: 1080px x 1080px

Format: PSD

Download: [Link here](#)

# IBC Social Media – Instagram



## Instagram Product Post

Size: 1080px x 1080px

Format: PSD

Download: [Link here](#)



## Instagram Message Post

Size: 1080px x 1080px

Format: PSD

Download: [Link here](#)

When posting a financial promotion via Instagram there are a number of points which you must factor in.

- You may only use the templates provided in the social media pack. No other social promotions are permitted.
- When referring to interest free credit, we ask that you only use those listed on slide 29
- Refrain from using images featuring prohibited products and services, including: adult entertainment, alcohol, drugs and tobacco, weapons, medical procedures, crypto, UV tanning equipment, spiritual or religious services, illegal/sensitive pharmaceuticals and pyramid schemes.
- All your posts must include this disclosure:
 

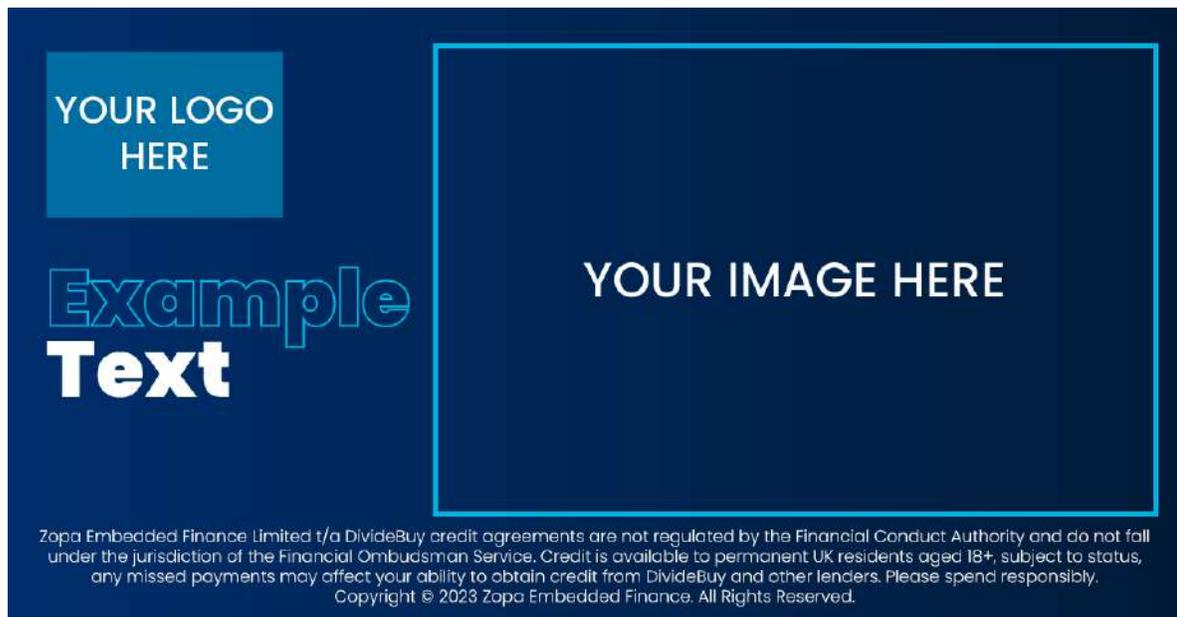
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**© Zopa Embedded Finance Limited 2023. All rights reserved.**
- All your posts must include this comprehensive examples with and add the specific figures
 

Representative Example:  
Price: £XX, 9.9% APR Fixed  
Monthly repayment: £XX.XX  
Total term: 48 months  
Total amount payable: £X.XX

## IFC Social Media – LinkedIn



### LinkedIn

Size: 1200px x 627px

Format: PSD

Download: [Link here](#)

When posting a financial promotion via LinkedIn, there are a number of points which you must factor in.

- You may only use the templates provided in the social media pack. No other social promotions are permitted.
- When referring to interest free credit, we ask that you only use those listed on slide 29
- Refrain from using images featuring prohibited products and services, including: adult entertainment, alcohol, drugs and tobacco, weapons, medical procedures, crypto, UV tanning equipment, spiritual or religious services, illegal/sensitive pharmaceuticals and pyramid schemes.
- All your posts must include this disclosure:
  - **Zopa Embedded Finance Limited t/a DivideBuy credit agreements are not regulated by the Financial Conduct Authority and do not fall under the jurisdiction of the Financial Ombudsman Service. Credit is available to permanent UK residents aged 18+, subject to status, any missed payments may affect your ability to obtain credit from DivideBuy and other lenders. Please spend responsibly. Copyright © 2023 Zopa Embedded Finance. All Rights Reserved.**

# IBC Social Media – LinkedIn



## LinkedIn Product

Size: 1200px x 627px  
Format: PSD  
Download: [Link here](#)



## LinkedIn message

Size: 1200px x 627px  
Format: PSD  
Download: [Link here](#)

When posting a financial promotion via LinkedIn, there are a number of points which you must factor in.

- You may only use the templates provided in the social media pack. No other social promotions are permitted.
- When referring to interest free credit, we ask that you only use those listed on slide 29
- Refrain from using images featuring prohibited products and services, including: adult entertainment, alcohol, drugs and tobacco, weapons, medical procedures, crypto, UV tanning equipment, spiritual or religious services, illegal/sensitive pharmaceuticals and pyramid schemes.
- All your posts must include this disclosure:
 

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**© Zopa Embedded Finance Limited 2023. All rights reserved.**
- All your posts must include this reprehensive examples with and add the specific figures
 

Representative Example:  
Price: £XX, 9.9% APR Fixed  
Monthly repayment: £XX.XX  
Total term: 48 months  
Total amount payable: £X.XX

# IFC InStore Point-of-Sale

0%  
APR

**Interest Free  
Credit Available**

Spread the cost with **monthly instalments**

dividebuy.co.uk

Please spend responsibly – borrowing beyond your means could seriously affect your financial status, ensure you can afford to make your repayments on time by the due date.

Some Unbanked Finance Limited (UK) offers credit agreements not regulated by the Financial Conduct Authority and are not subject to the same rules as credit regulated by the Financial Conduct Authority. Credit is available to customers of selected agents only. Subject to terms, any interest payments may affect your ability to obtain credit from other lenders. Please spend responsibly. Copyright © 2023 Unbanked Finance. All Rights Reserved.

**DivideBuy**

A2-Poster-H1 [DOWNLOAD](#)

0%  
APR

**Interest Free  
Credit Available**

Spread the cost with **monthly instalments**

dividebuy.co.uk

Please spend responsibly – borrowing beyond your means could seriously affect your financial status, ensure you can afford to make your repayments on time by the due date.

Some Unbanked Finance Limited (UK) offers credit agreements not regulated by the Financial Conduct Authority and are not subject to the same rules as credit regulated by the Financial Conduct Authority. Credit is available to customers of selected agents only. Subject to terms, any interest payments may affect your ability to obtain credit from other lenders. Please spend responsibly. Copyright © 2023 Unbanked Finance. All Rights Reserved.

**DivideBuy**

A2-Poster-H2. [DOWNLOAD](#)

0%  
APR

**Interest  
Free Credit  
Available**

Spread the cost with  
**monthly instalments**

dividebuy.co.uk

Please spend responsibly – borrowing beyond your means could seriously affect your financial status, ensure you can afford to make your repayments on time by the due date.

Some Unbanked Finance Limited (UK) offers credit agreements not regulated by the Financial Conduct Authority and are not subject to the same rules as credit regulated by the Financial Conduct Authority. Credit is available to customers of selected agents only. Subject to terms, any interest payments may affect your ability to obtain credit from other lenders. Please spend responsibly. Copyright © 2023 Unbanked Finance. All Rights Reserved.

**DivideBuy**

A2-Poster-V1. [DOWNLOAD](#)

0%  
APR

**Interest  
Free Credit  
Available**

Spread the cost with  
**monthly instalments**

dividebuy.co.uk

Please spend responsibly – borrowing beyond your means could seriously affect your financial status, ensure you can afford to make your repayments on time by the due date.

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Easy Application



Immediate Decision



No Hidden Charges

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Spread the cost with monthly instalments



Easy Application



Immediate Decision



No Hidden Charges

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- Immediate Decision
- No Hidden Charges

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# IBC InStore Point-of-Sale



A3 POS Template Message [DOWNLOAD](#)



A3 POS Template Product [DOWNLOAD](#)

Each IBC POS Template is supplied as a A3 Illustrator file. This can be resized for various formats but any artwork must include the disclaimer and representative example

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Zopa Embedded Finance Limited (14602085) is incorporated in England & Wales and has its registered office at: First Floor, Brunswick Court, Brunswick Street, Newcastle-under-Lyme, ST5 1HH.

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Representative Example:  
 Price: £XX, 9.9% APR Fixed  
 Monthly repayment: £XX.XX  
 Total term: 48 months  
 Total amount payable: £X.XX.

**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](mailto:retailersupport@dividebuy.co.uk)

Tel +44 (0)1782 491627 selecting option 2