



# Privacy Notice

**[Business Name]** is a trading style of **[Company]**, which are **[Company Type]** based in the UK. We act as a secondary credit broker for our customers. **[Company]** are Authorised and Regulated by the Financial Conduct Authority. **[FRN Number]**

**[Company]** is committed to processing your personal data in accordance with EU data protection laws. This Data Protection Notice aims to give you information on how your personal data (i.e., information which directly or indirectly identifies you) will be processed by **[Company]**. For the purposes of EU and UK data protection laws, **[Company]** is a data controller.

Further details of how **[Company]** will manage your data will be provided to you.

## Data That May Be Collected

**[Company]** may collect certain personal data with respect to you as a customer, including, without limitation your name, address, date of birth, contact details, credit reference data, financial and employment details, banking and credit card details, and details of your business. **[Company]** will collect some of this data from third parties, for example credit reference agencies.

Where a corporate entity is entering into this contract **[Company]** will collect personal data about the individuals who are directors and shareholders of the business from credit reference agencies where this data is held publicly, such as at Companies House. This notice also applies to the processing of such personal data and use of the word 'you' in this notice will encompass such individuals. **[Company]** may process sensitive personal data (including, for example, information revealing an individual's physical or mental health). Where sensitive personal data are processed **[Company]** will obtain your explicit consent for the processing.

## Use of Personal Data

**[Company]** will use your personal data for: provision of products and services, credit and AML risk assessment, assessing ongoing credit performance, recoveries, collections, insurance administration, profiling for marketing purposes, market research and product development, statistical analysis, marketing, fraud prevention and detection and otherwise as necessary to comply with applicable laws, regulations and/or codes of practice. The processing of personal data may be necessary for the performance of a contractual relationship, compliance with a legal obligation, or where it is in the legitimate interests of a member of any group of companies of which **[Company]** is a member. Your acceptance of this Privacy Policy indicates clear consent for **[Company]** to process your personal data for a specific purpose.

## Disclosure to Certain Third Parties

**[Company]** may disclose certain personal data: (i) within the group of companies of which **[Company]** is a member; (ii) to **[Company]**'s brokers and dealers / suppliers, professional advisors and service providers (including, information technology systems providers and recovery agents); (iii) to courts, governmental and non-governmental regulators and ombudsmen; (iv) to fraud prevention agencies and law enforcement agencies; (v) to any third party that acquires, or is interested in acquiring, all or part of **[Company]**'s assets or shares, or that succeeds **[Company]** in carrying on all or a part of its business, whether by merger, acquisition, reorganization or otherwise; and (vi) as otherwise required or permitted by law.



[Company] may also pass your Personal Data on to a member of any group of companies of which [Company] is a member and/or any relevant third party and both [Company] and/or they may use it for any purpose linked to any sale of and/or granting of security over the agreement [Company] has with you. In such circumstances, such third parties may also use and/or disclose your Personal Data to any third party that they ask to assist them with the preparation for and/or completion of any such sale and/or granting of security; they may also, once such sale and/or granting of security is completed, use and/or disclose your Personal Data to third parties for any of the other purposes which we have outlined in this notice in the same way as if they had entered into the agreement with you instead of us.

The personal information [Company] will collect will be shared with fraud prevention agencies who will use it to prevent fraud and money-laundering and to verify your identity. If fraud is detected you could be refused certain services, finance or employment. Further details of how your information will be used by [Company] and these fraud prevention agencies, and your data protection rights can be found on [Company]'s website, details of which will be provided to you.

In order to process your application, [Company] will perform credit and identity checks on you with one or more credit reference agencies ("CRAs"). To do this, [Company] will supply your personal information to CRAs and they will give [Company] information about you, even if your application does not proceed or is unsuccessful. This will include information from your credit application and about your financial situation and financial history. CRAs will supply to [Company] both public (including the electoral register) and shared credit, financial situation and financial history information and fraud prevention information. [Company] will use this information to:

- Assess your creditworthiness;
- Verify the accuracy of the data you have provided ;
- Prevent criminal activity, fraud and money laundering;
- Manage your account(s);
- Trace and recover debts; and
- Ensure any offers provided to you are appropriate to your circumstances.

[Company] will continue to exchange information about you with CRAs while you have a relationship with it. [Company] will also inform the CRAs about your settled accounts. If you borrow and do not repay in full and on time, CRAs will record the outstanding debt. This information may be supplied to other organisations by CRAs. When CRAs receive a search from [Company] they will place a search footprint on your credit file that may be seen by other lenders.

If you are making a joint application, or tell [Company] that you have a spouse or financial associate, [Company] may link your records together, so you should make sure you discuss this with them, and share with them this information, before lodging the application. CRAs will also link your records together and these links will remain on your and their files until such time as you or your partner successfully files for a disassociation with the CRAs to break that link.

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 at each of the three CRAs websites – any of these three links will take you to the same CRAIN document:

Transunion [www.callcredit.co.uk/crain](http://www.callcredit.co.uk/crain) ; Equifax [www.equifax.co.uk/crain](http://www.equifax.co.uk/crain) ; Experian [www.experian.co.uk/crain](http://www.experian.co.uk/crain).



## Transfer of Personal Data Outside the European Economic Area (“EEA”)

[Company] may transfer your personal data to recipients (including a member of any group of companies of which [Company] is a member) located in countries outside of the EEA which may not have data privacy laws equivalent to those in the EEA. In those instances, [Company] will take all necessary steps to protect your personal data in accordance with applicable data privacy laws.

## Your Rights

Under applicable EU data privacy laws, you may have a right to: (i) request access to and rectification or erasure of your personal data; (ii) obtain restriction of processing or to object to processing of your personal data; and (iii) data portability (i.e. to request the transfer of personal data from one data controller to another in certain circumstances). If you wish to exercise any of these rights you should contact the [Company]'s Data Privacy Officer. You also have the right to lodge a complaint about the processing of your personal data with your local data protection authority.

[Company] may rely on automated credit assessment based on the personal data you provide and data which [Company] obtains from a credit reference agency or similar sources about your credit profile or history. The outcome of this process can result in an automated decline of your application where it does not meet [Company]'s acceptance criteria. [Company] will review this acceptance criteria regularly to ensure fairness in the decisions made. You have a right to ask [Company] to manually review any decision taken in this manner.

In addition [Company] may use automated profiling to identify whether other products or services may be of use to you when it considers marketing campaigns. You have a right to object to this automated profiling. This is separate to the right you have to object to receive marketing.

## Security

All the personal data we use is controlled by [Company] in the UK, however, for the purposes of IT hosting and maintenance, this information is located on servers within the European Union. In the event of the UK no longer having member status within the EU, this information will be held on servers within the UK. No 3rd parties have access to your personal data unless the law allows them to do so. We have a Data Protection regime in place to oversee the effective and secure processing of your personal data. More information on this framework can be given on request. [Company] will take steps to protect your personal data against loss or theft, as well as from unauthorized access, disclosure, copying, use or modification, regardless of the format in which it is held.

## Retention

[Company] will normally only retain your personal data for a number of years from the latest date on which it has a financial arrangement in place with you. Under certain circumstances this period may vary if [Company] consider it necessary for good operational or commercial reasons, or in order to meet other legal obligations. Details of this period will be provided to you. We are required under The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 to keep your basic personal data, such as name, address, email, dependents, telephone numbers, date of birth, brokered agreements, and digital and physical proofs of identity for a minimum of 6 years after the end of any agreement, after which time it will usually be destroyed.



## **Enquires, Requests of Concerns**

All enquiries, requests or concerns regarding this Notice or relating to the processing of Personal Data, should be sent to [\[Email\]](#)

## **Additional Details**

Your application for finance will be submitted to one or more finance company(s) by ourselves, the supplier of the vehicle or equipment or another intermediary. On or shortly after the date on which this happens, you will be given a notice in respect of each any finance company making you an offer which will confirm its identity and provide you with further details.