

# **FAIR PROCESSING NOTICE (LONG FORM)**

## **USE OF YOUR INFORMATION**

Before we provide services, goods or financing to you and throughout the course of any agreement, the lenders undertake checks for the purposes of carrying out their obligations under this agreement. Exercising their rights under this agreement. Ensuring your continued creditworthiness, preventing fraud and money laundering and to verify your/others identity(ies). These checks require us to process your personal information and if you do not provide this information, we may not be able to offer you these services, goods or financing.

We use the personal information/data that we have collected from you, collected from other sources or we have generated about you, which may include your name, date of birth, residential address, address history, contact details (e.g. email address and telephone number), financial information, employment information, identifiers assigned to your computer or other internet connected device including your Internet Protocol (IP) address and vehicle details.

## **WHAT WE WILL DO WHEN YOU APPLY FOR FINANCE:**

We use your personal information in the following ways:

- The Lender will use your personal information to search your records at credit reference agencies. If you are an owner, director or partner in a small business, we may also use your information to search your business' records. We will also perform checks on any proposed guarantor of your obligations under the proposed agreement using the information provided. So you must be sure you have your proposed guarantor's agreement to disclose their information. We use the following credit reference agencies:
  - If you enter into an agreement via us, the Lender will give details of this agreement, the payments you make under it and any default or failure to keep to its terms, and any change of name or address, to credit reference agencies. Account information given to these agencies remains on our files for 6 years after the account is closed, whether settled by you or upon default. If you do not enter into an agreement with us, your information will be retained for 12
  - If you enter into an agreement with us, we will keep a record of this agreement for 6 years after the account is closed. If you do not enter into an agreement with us, your information will be retained for 3 months.
  - We will also provide your information to fraud prevention agencies to prevent or detect fraud, money laundering, and to verify your identity. If you give us false or inaccurate information or we suspect or identify fraud, we will record this and may also pass this information to our Group Companies, fraud prevention agencies and other law enforcement agencies involved in fraud prevention to detect, investigate and prevent
  - We may pass your information to our Group Companies, agents and others for the administration of your application or providing a service you have requested related to the proposed agreement. to any guarantor of your obligations under the proposed agreement, to other third parties when required or permitted by law, such as in relation to any legal proceedings or to investigate or prevent crime, or where you give your

permission, or in the process of us transferring the proposed agreement or our business to another organisation. If any of these organisations are in other countries in the European Economic Area, they will have similar standards of data protection as in the UK. If any of these organisations are outside of the European Economic Area, your personal information may be transferred to, stored and processed in a country that is not regarded as ensuring an adequate level of protection for personal information under European Union law. We will make sure there are appropriate safeguards (such as contractual commitments) in accordance with applicable legal requirements to ensure that your information is adequately protected. For more information on, or to see a copy of, the appropriate safeguards in place please contact us using the contact details below.

- We will use a scoring or other automated decision-making system to assess your application and to verify your identity. If the results indicate that your identity is not verifiable or that you pose a significant credit risk, we may not be able to provide you with financing. You have rights in relation to this automated decision-making. Please contact us using the contact details provided
- Where we do not use your information on the basis of your consent or where it is required for compliance with a legal obligation, we use your information because it is in our legitimate interests to do so in order to manage our business efficiently and effectively, to avoid fraud and money laundering, to ensure we provide an appropriate service, to exercise our legal rights and to ensure our records are kept up to date. If we do collect your personal information by relying on your consent, you have the right to revoke your consent at any time.
- Our Group Companies trade under the Vanflex, Vehicleflex, Bowaterprice and Midland Autolease Contracts brands.

## **What the credit reference agencies will do:**

- Whether or not your application for finance proceeds, credit reference agencies will place on your credit file a record of our search including the personal information you provide to us. This record of that search (but not our name) will be seen by other organisations when you apply for credit in the future. A large number of applications within a short period of time could affect your ability to obtain
- Whether or not your application for finance proceeds, the agencies will link your records and those of your financial associate(s), including any previous and subsequent names. A financial associate is a person with whom you have, or have had, joint personal financial arrangements such as joint accounts or have made joint credit applications. It may be a spouse or partner (not a business partner). These links will remain on your and their files until you or they successfully file for a disassociation at the credit reference
- The agencies may supply to us credit information such as previous applications and the conduct of accounts in your name and of your financial associate(s) and any business accounts you have, public information such as County Court Judgments and bankruptcies and Electoral Register information, and fraud prevention
- The agencies use this information to fulfil their legitimate business interests, by ensuring they provide an appropriate service to customers and ensuring that their records are kept up to The agencies will hold your information for six years.
- More information about credit reference agencies and how they use personal information is available at [experian.co.uk/crain](https://experian.co.uk/crain) and [www.equifax.co.uk/crain](https://www.equifax.co.uk/crain)

# **WHAT FRAUD PREVENTION AGENCIES WILL DO:**

- Fraud prevention agencies will use the personal information you provide to us and information collected from other providers, to prevent fraud and money laundering and to verify your identity. They may also allow law enforcement agencies to access and use your personal information to detect, investigate and prevent crime or pass such information to law enforcement agencies. This is on the basis that we and they have a legitimate interest in preventing fraud and money laundering and to verify your identity, in order to protect our business and to comply with laws that apply to us. This processing is also a contractual requirement of the financing you have
- As part of the processing of your personal information, decisions may be made by automatic means. You may automatically be considered to pose a fraud or money laundering risk if this processing reveals your behaviour to be consistent with that of known fraudsters or money launderers, inconsistent with your previous submissions or if you appear to have hidden your true identity. You have rights in relation to this automated decision-making. Please contact the fraud prevention agencies for more
- Fraud prevention agencies can hold your personal information for different periods of time, depending on how that data is being
- If you are considered to pose a fraud or money laundering risk, your information can be held (and a record retained) by fraud prevention agencies for up to six years from its receipt. In this case, we may refuse to provide the financing and other services you have requested, or we may stop providing existing financing to you. Additionally, this may result in others refusing to provide services, financing or employment to you. Please

use the contact details provided above if you would like more information about our

- If fraud prevention agencies transfer your personal data outside of the European Economic Area, they impose contractual obligations on the recipients of that data to protect your personal data to the standard required in the European Economic Area. They may also require the recipient to subscribe to 'international frameworks' intended to enable secure data sharing. For more information on, or to see a copy of, the appropriate safeguards in place please contact the fraud prevention

## **HOW WE AND OTHERS USE THE AGENCY INFORMATION ABOUT YOU:**

Some information held by the credit reference and fraud prevention agencies will be disclosed to us and other organisations to, for example:

- prevent fraud and money laundering by, for example, checking details on applications for credit and credit related or other facilities;
- checking details on proposals and claims for all types of insurance; checking details of job applications and employees;
- verify your identity if you or your financial associate(s) applies for other facilities including all types of insurance applications and claims;
- make decisions on credit, insurance and other facilities, about you, your financial associate(s), members of your household or your business;
- trace your whereabouts and recover debts that you owe;
- manage credit and credit related accounts and other facilities; and
- undertake statistical analysis, training and system

- carry out customer surveys for internal research purposes
- We and other organisations may access and use from other countries the information recorded by fraud prevention agencies. We and other organisations use this information in these ways as it is in our legitimate interests to ensure that we manage our business efficiently, avoid fraud and credit risk, provide appropriate products and services to our customers, and to ensure that our records are kept up to date.

The information held by these agencies may also be used for other purposes for which you give your specific permission or, in very limited circumstances, when required by law or where permitted under relevant data protection and privacy law.

If you want to receive details of the credit reference and/or fraud prevention agencies from whom we obtain and with whom we record information about you, please write to us at Alphabet Customer Information Services at the address below.

## **YOUR RIGHTS**

You have certain rights regarding your information. These include the rights to access your personal information; to rectify the information we hold about you; to erase your personal information; to restrict our use of your personal information; to object to our use of your personal information; to receive your personal information in a usable electronic format and transmit it to you a third party (right to data portability). If you are unhappy about how your personal data has been used please refer to our complaints policy: <https://bowaterprice>. You also have the right to complain to the Information Commissioner's Office using its website: <https://ico.org.uk/whdocuments@bowaterprice>. or by telephone on 0345 27 25 100

