



# How We Use Your Data

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In order to process your application, we will perform credit and identity checks on you using TransUnion (<https://www.transunion.co.uk/crain>), a trusted and leading credit reference agency (CRA).

We maintain the right to use one or more credit reference agencies (CRAs) - the three main consumer credit reference agencies in the UK are TransUnion, Equifax and Experian. It is these CRAs that give UK lenders a range of information about potential borrowers, which lenders use to make decisions about whether they will offer you credit or not. They hold certain information about most adults in the UK.

Where you take financial services from us we may make periodic searches at CRAs to manage your account with us. To do this, we will supply your personal information to CRAs and they will give us information about you. This will include information from your credit application and about your financial situation and financial history. CRAs will supply to us both public (including the electoral register) and shared credit, financial situation and financial history information and fraud prevention information.

## **We will use this information to:**

- Assess your creditworthiness and whether you can afford to take the product;
- Verify the accuracy of the data you have provided to us;
- 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.

We will continue to exchange information about you with CRAs while you have a relationship with us. We 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 us 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 us that you have a spouse or financial associate, we will 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 the Information Commissioner's Office (ICO) at [ico.org.uk/for-the-public/credit](https://ico.org.uk/for-the-public/credit). The ICO is the UK's leading independent authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals.**

**Credit Reference Agency Information Notice (CRAIN) is accessible from TransUnion at [www.transunion.co.uk/crain](https://www.transunion.co.uk/crain). The same information is available from other lenders, including Equifax at [www.equifax.co.uk/crain](https://www.equifax.co.uk/crain) and Experian at [www.experian.co.uk/crain](https://www.experian.co.uk/crain).**



# Fraud Prevention

## GENERAL

1. Before we provide services, goods or financing to you, we undertake checks for the purposes of preventing fraud and money laundering, and to verify your identity. These checks require us to process personal data about you.
2. The personal data you have provided, we have collected from you, or we have received from third parties will be used to prevent fraud and money laundering, and to verify your identity.
3. Details of the personal information that will be processed include, for example: name, address, date of birth, contact details, financial information, employment details, device identifiers including IP address and vehicle details.
4. We and fraud prevention agencies may also enable law enforcement agencies to access and use your personal data to detect, investigate and prevent crime.
5. We process your personal data on the basis that we have a legitimate interest in preventing fraud and money laundering, and to verify identity, in order to protect our business and to comply with laws that apply to us. Such processing is also a contractual requirement of the services or financing you have requested.
6. Fraud prevention agencies can hold your personal data for different periods of time, and if you are considered to pose a fraud or money laundering risk, your data can be held for up to six years.

## AUTOMATED DECISIONS

7. As part of the processing of your personal data, decisions may be made by automated means. This means we may automatically decide that you pose a fraud or money laundering risk if our processing reveals your behaviour to be consistent with money laundering or known fraudulent conduct, or is inconsistent with your previous submissions, or you appear to have deliberately hidden your true identity. You have rights in relation to automated decision making: if you want to know more please contact us using the details above.

## CONSEQUENCES OF PROCESSING

8. If we, or a fraud prevention agency, determine that you pose a fraud or money laundering risk, we may refuse to provide the services or financing you have requested, or to employ you, or we may stop providing existing services to you.
9. A record of any fraud or money laundering risk will be retained by the fraud prevention agencies, and may result in others refusing to provide services, financing or employment to you. If you have any questions about this, please contact us on the details above.

## DATA TRANSFERS

10. Whenever 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.

## YOUR RIGHTS

11. Your personal data is protected by legal rights, which include your rights to object to our processing of your personal data; request that your personal data is erased or corrected; request access to your personal data.
12. For more information or to exercise your data protection rights, please contact us using the contact details above.
13. You also have a right to complain to the Information Commissioner's Office which regulates the processing of personal data.