

1. Introduction

We're committed to providing you with the highest possible levels of service, security, and protection when we process your personal data.

Personal data is any information that can be used to identify you as a unique individual. We must process your personal data fairly and lawfully. This also means you're entitled to know how we intend to use your data. You can then decide if you want to give it to us so we can provide the product you need.

All our employees are responsible for maintaining customer confidentiality and we provide training to remind them about their obligations. In addition, our policies and procedures are regularly audited and reviewed.

Your personal data is managed by Moneybarn No.1 Ltd which is part of the Vanquis Banking Group. Vanquis Banking Group consists of the following companies which may process personal data: -Vanquis Bank Ltd -Cheque Exchange Ltd -Provident Financial Group Corporate Services Ltd -Moneybarn Ltd -Moneybarn No.1 Ltd -USnoop Ltd For more information on these companies please visit <u>Our products (vanquisbankinggroup.com)</u>

If you have any questions about this notice, see the **'Contact us'** section for the ways you can reach us and when we're available.

More information

Why not watch our short, helpful explanation video, and you can click on any of the sections shown below to find out more.

https://player.vimeo.com/video/888997306

2. Personal data we collect from you

- We collect your personal data when you:
- apply for our products or services through channels such as:
 - our website
 - on the phone

- through our partners, brokers, or affiliates
- on our app or via the customer portal on our website
- update your information online, through email or over the phone, for example when you change your address
- speak to us on the phone, for example when you ask us a question about your account or when we receive an update on your personal circumstances



- visit our website, use our online web chat services and any digital or mobile app we may offer now or in the future
- send us letters, emails or other documents

The types of personal data we collect from you include:

Identity:

Full name, title, date of birth and agreement number

Contact:

Full address, email address and phone number

Financial:

Bank details, credit/debit card details, earnings, income, expenditure, spending habits, transaction history, tax reference number, credit history, source of wealth, source of funds and information about others you are financially linked to

Profile:

Gender, occupation, marital status, employment status, employer details, citizenship status, residential status, and vehicle insurance information

Identification:

Driving licence, share code, passport, National Insurance number, vehicle identification number (VIN), and other national identifiers

Communication:

Call recordings, emails, and any other form of communication

Technical:

Internet Protocol (IP) address, location data, operating system and browsing behaviour, for example tracking your clicks on a webpage

Special Category Data:

- racial or ethnic origin;
- political opinions;
- religious or philosophical beliefs;
- trade union membership;
- genetic data;
- biometric data (where used for identification purposes);
- data concerning health;
- data concerning a person's sex life; and
- data concerning a person's sexual orientation.

Criminal Data:

Criminal convictions and offences, penalties and restrictions, County Courts Judgements, and insolvency details



3. Personal data we collect from others

Sometimes we work with carefully selected third parties and we may receive your personal data from them. These include:

- other companies across the Vanquis Banking group (See 'Introduction' section above)
- suppliers (see a full list here)
- sub-contractors that help to support management of your account
- referrers, for example affiliates or brokers
- Industry fraud databases, for example Cifas and National Hunter
- publicly available data, for example the electoral register
- Credit Reference Agencies (CRAs)
- Debt charities
- Debt management agencies
- Insolvency services
- marketing list providers
- Social media platforms

We may obtain personal data relating to you from other individuals. If someone acting on your behalf provides this data, we'll record what's been provided and who gave it to us.

When you provide personal data about another individual, we will assume you have told them you are sharing their details and where they can find more information on how we process their personal data.

This can include individuals who are:

- a joint applicant on an account you hold or are applying for
- an appointed representative acting under a Power of Attorney or similar authority
- an individual you have given permission to communicate with us on your behalf

4. How we use your personal data

This table gives you information on what activities we use your data for, why we need to use your data and what our reason is for doing so.

For some of our activities, we have a legitimate business need to use your personal data (you'll see this referred to as 'Legitimate Interest'). This means we carry out those activities to support both the management of your data and our wider business objectives.

Activity	Purpose	Types of Personal Information	Legal Basis for processing your information
Processing your application for a product or service with us.	To consider and process applications made by	Identity data	- Necessary for
	you for products and services we provide, we	Contact data	the performance
	may:	Financial data	of a contract
	- Share information with Credit Reference	Profile data	
	Agencies (see the section named 'Credit	Identification data	
	Reference Agencies' for more information), or	Communication	



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Managing and administering your account with us.	by other means, such as assessing information we hold about you, for example where we have an existing relationship with you. - Assess your application using an automated credit decisioning process - Assess your ability to repay your loan, we may review your income and expenditure, based on data we hold, capture or you provide To deliver the products and services we provide, including: - Receiving payments from you - Providing you with information, advice and guidance on the products and services you hold. This includes account statements, formal reminders and notices informing you of changes - Providing updates on your repayment status to credit reference agencies, including if default occurs - To recover money owed to us - To respond to queries raised by you via email, post or phone - To calculate interest and, where relevant, determining fees and charges which may apply to your account - Searching Credit Reference Agency data to support discussions with you regarding repayments to your product - Where necessary, and if you agree, we will share your information with not for profit debt advisory services such as StepChange - If you are employed by us and you are also a customer, we will use your customer information to help manage your employee relationship with us	data Special Category data (if disclosed by you) Criminal data (if disclosed by you) Identity data Contact data Financial data Profile data Identification data Communication data Special Category data Criminal data	- Necessary for the performance of a contract - Legitimate Interest - Legal obligation
	us - Where we have a duty to protect vulnerable customers - Where necessary, we will use your data in line		
	with our terms and conditions		
Sending you	To make sure we're giving you the important	Identity data	Legitimate
communication	information you need, we will use various	Contact data	Interest
to service your	methods of communication to send you	Communication	
account,	information about your account or general	data	
products or	updates in relation to Vanquis Banking Group		
services and to	(VBG). This may be by post, SMS or email. For		
provide you	example, this may include sending you		
with Vanquis	reminders or receipts for payments or other		
Banking Group	information in relation to the administration of		
updates.	your product. It may also include sending you		

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	service messages updating you about company		
Competitions, gifts, rewards, and prize draws.	acquisitions and mergers. With your permission, we will use your information to help administer competitions and prize draws which you have taken part in. We also may use your information to inform you of other competitions or send you gifts or rewards as part of our customer service program.	Identity data Contact data Communication data	Legitimate Interest Consent
To manage complaints raised by you	To address enquiries or complaints we may receive from you, or a representative appointed by you.	Identity data Contact data Communication data Special Category data Financial data Profile data	Legitimate Interest
Testing our systems and processes	Where necessary, we may use your personal data to improve and/or test the accuracy of our systems and processes.	Identity data Contact data Special Category data Financial data Profile data	Legitimate Interest
	To support product development: To develop and improve new products and services and identifying which may be of interest to you.	Identity data Contact data Financial data Profile data	Legitimate Interest
Profiling activities	To support the creation of marketing campaigns: For more information, see the section 'Automated decision making and profiling' .		
	To support our decisions: To help ensure our decision controls within the application are fit for purpose.		
Sharing relevant marketing about our products and	With your consent, we and our Group Companies will contact you by App or Online, SMS, email, post, and phone about products or services which we think are relevant to you.	ldentity data Contact data Profile data	Consent
services	See the section 'Using your data for direct marketing' for further information.		
Sharing your details with brokers	To share your contact details with brokers who introduce you to us to help them with their accounting and administration.	Identity data Contact data Financial data	- Legitimate Interest - Consent
Meeting our legal and	We have a legal responsibility to use your data for the following activities: - Passing information to HMRC where a court	Identity data Contact data Financial data	 Legal obligation Necessary for



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regulatory	order is in place	Identification data	the performance
obligations	 Sharing your data if it is requested by the Police and other law enforcement agencies to investigate or prevent crime Sharing your data if it is requested by the authorities when we report on any suspicious activity that could indicate money laundering To undertake affordability reviews Sharing your data to provide information to our industry regulators There may be other occasions where data may need to be shared as a result of a court or production order Identifying and managing risks to our organisation Where we have a duty to protect vulnerable customers Sending regulatory communications to you, such as annual statements, default notices and interest rate change communications 	Communication data Special Category data	of a contract
Auditing and assuring our processes, products, and services	To carry out internal and external audit activities, to examine and evaluate the effectiveness of our internal systems and controls.	Identity data Contact data Financial data Identification data Communication data Special Category data Criminal data	- Legal obligation
Conducting market research and surveys	To understand your experience and interactions with us so we can improve our products and services.	Identity data Contact data	- Legitimate Interest
Preventing and investigating fraud and financial crime	We may use your data to check your identity, to detect, investigate and report financial crime, and to ensure we are taking measures to prevent fraud and financial crime. This may also involve sharing your personal data with third parties. For more information, see the sections named 'Credit Reference and Fraud Prevention Agencies' and 'Sharing your personal data' .	Identity data Contact data Profile data Financial data Identification data Criminal data Communication data Special Category data Technical data	- Legitimate Interest - Legal obligation
Collecting IP address when using our web site	We may collect your IP address when you use our websites to help us detect suspicious activities. We may also collect this information to	Technical data	 Legitimate Interest Consent (Non- essential cookies)



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	manage your cookie preferences. For more		
	information, see our Cookie Policy here.		
Manage your vehicle appointment bookings	Where necessary, we may use your data to manage and arrange an inspection of your vehicle, or to arrange return of your vehicle.	Identity data Contact data Profile data	- Consent
Managing Power of Attorney or Letter of Authority processes	Upon signed instruction, we will discuss matters arising from your account with your appointed representative.	Identity data Contact data Profile data Financial data Identification data Criminal data Communication data Special Category data Technical data	- Necessary for the performance of a contract
Supporting you through the arrears and debt collection processes	We may share your personal data with third parties for the following reasons: - To recover money owed to us - To trace your whereabouts - To recover goods owed to us, for example vehicles.	Identity data Contact data Profile data Financial data Identification data	- Legitimate Interest
To sell your debt to third parties	We may sell your account to third parties where we can no longer recover the debt.	Identity data Contact data Profile data Financial data Identification data	- Legitimate Interest
Mergers, acquisition, and business funding	We may share your data with another company to support our business objectives, which may involve buying, selling, or funding of business assets.	Identity data Contact data Profile data Financial data Identification data Criminal data Communication data Special Category data Technical data	- Legitimate Interest
Sharing your data with other companies within our Group	We will share your personal data with our Group companies for the following reasons: - to provide the products and services you request - for profiling and market research - to support business analysis, for example assessing and improving the performance of our products and services - to help us to keep your data accurate and up-	Identity data Contact data Profile data Financial data Identification data Criminal data Communication data	- Legitimate Interest - Legal obligation



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	to-date	Special Category	
	- for marketing purposes	data	
	 to carry out affordability reviews 		
	 to respond to your queries and complaints 		
	- to administer offers, competitions and		
	promotions		
	- Transactional analysis		
	- for arrears, debt recovery and debt sale		
	activities, including where we need to trace your		
	whereabouts		
	- For internal reporting purposes		
	- Where the companies provide services to each		
	other		
	- for the detection, prevention, and prosecution		
	of crime		
	- To enable assessment of lending risks by		
	considering all the products you have across the		
	group of companies. This may include		
	consideration of previous product payment		
	history to help us assess your income and		
	expenditure and we may periodically update this		
	information to enable us to make responsible		
	lending decisions.		
	- Information obtained if you consented to using		
	open banking		
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5. Credit Reference and Fraud Prevention Agencies

Credit Reference Agencies

In order to process your application, we will perform credit and identity checks on you with one or more credit reference agencies ("CRAs"). If you open product with us, we may also make periodic searches at CRAs to manage your account with us.

To do this, we will supply your personal data to the CRAs and they will give us information about you. This will include information from your credit application, your financial situation and financial history. The CRAs will supply to us both public (including the electoral register) and shared credit information including 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 and any default. This information may be supplied to other organisations by CRAs.

When we complete a search for any information about you at any CRA, they will place a search footprint on your credit file that may be seen by other lenders and gambling organisations. Where we have an existing relationship with you, we may rely upon information we already hold upon you, to assess applications by you for further lending on existing and other products we offer. This will not result in another search footprint appearing on your credit file.

If you are making a joint application, or tell us that you have a financial associate, we will assess your application based on the records of yourself and your financial associate where appropriate. 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 yours and their files until such time as you or your financial associate successfully files for a disassociation with the CRAs to break that link.

Where you have made an eligibility enquiry or an application for a product, only where we have your permissions, will we obtain information about your credit file from the credit reference agency. We may use your information and that of any of your financial associates to review your credit file and tell you about other similar Vanquis products and services and those of the Vanquis Banking Group that you may be eligible for. We may do so for up to three years.

We may also obtain information from your credit file and use it, only where we have your permissions, to enhance our understanding of our customers' needs and to help us develop products and services to meet

For a better road ahead

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these. This may contain credit information about you for up to seven years from the date of your last contact with us. Your credit file and your ability to obtain credit elsewhere will not be affected by this activity. You have the right to tell us to cease using your data for these purposes (see the section **Your data subject rights and how to exercise them)**.

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 data, data retention periods and your data protection rights with the CRAs are explained in more detail on the Credit Reference Agency Information Notice ('CRAIN'), which may be accessed via the links to the CRAs detailed below.

- TransUnion (formerly Callcredit): <u>https://www.transunion.co.uk/crain</u>
- Experian: <u>https://www.experian.co.uk/crain</u>
- Equifax: <u>https://www.equifax.co.uk/crain</u>

We may also use services from TransUnion for purposes not described in the CRAIN, such as fraud prevention and identity verification. Full details of these purposes are contained in TransUnion's privacy notice, which you can find here: www.transunion.co.uk/legal-information/bureau-privacy-notice

Fraud Prevention Agencies

Before we provide services, goods or financing to you, we undertake checks for the purposes of preventing fraud, money laundering and terrorist financing, and to verify your identity. These checks require us to process personal data about you.

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.

Details of the personal information that will be processed include, for example:

- full name
- title

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- address
- date of birth
- contact details
- financial information
- employment details
- device identifiers, including IP address
- vehicle details

We and fraud prevention agencies may also enable law enforcement agencies to access and use your personal data to detect, investigate and prevent crime.

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.

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

• 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 **contact us** using the details below.

Consequences of Processing

- 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.
- 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, contact us on the details below.

Data Transfers

Fraud prevention agencies may allow the transfer of your personal data outside of the UK. This may be to a country where the UK Government has decided that your data will be protected to UK standards, but if the transfer is to another type of country, then the fraud prevention agencies will ensure your data continues to be protected by ensuring appropriate safeguards are in place.

Your Rights

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- 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, and request access to your personal data.
- For more information or to exercise your data protection rights, **contact us** using the contact details below.
- You also have a right to complain to the Information Commissioner's Office, which regulates the processing of personal data.

With fraud prevention or law enforcement agencies, in the event false or inaccurate information is provided and fraud or money laundering is identified. We and other organisations will also access and use this information to prevent fraud and money laundering, for example when checking details on applications for credit and credit related and other facilities, managing credit and credit-related accounts or other facilities, recovering debt, checking details on proposals and claims for all types of insurance, and checking details of job applicants and employees.

We will request that information held by credit reference and fraud prevention agencies, other industry participants and the Motor Insurance Database be disclosed to us and other organisations to, for example:

• Prevent fraud and money laundering, for example by checking details on applications for credit and credit-related or other facilities, proposals and claims for all types of insurance and job applications and employee records



- To identify you when you contact us or visit our website, and to prevent and detect fraud or money laundering. This may involve the use of voice detection technology to analyse recordings of your telephone calls with us
- Recover debts that you owe and trace your and the goods whereabouts
- Manage credit accounts and other facilities
- Verify your identity
- Make decisions on credit, insurance and other facilities about you, your financial associate(s), members of your household or your business
- Carry out statistical analysis to help with decisions about credit and account management
- Checking the vehicle you have selected is fully insured under a comprehensive insurance policy.

6. Using your data for direct marketing

If you consent to direct marketing, depending on the methods you have agreed to, we and our group companies will contact you by App/Online, SMS, email, post, and phone about Moneybarn and group company products or services we have available which we think are relevant to you. You have a legal right to prevent your information being used for direct marketing purposes.

If you do not want your information to be used for these marketing purposes, you can opt out by calling our Customer Services Team on <u>0330 555 1230</u>, or by emailing <u>customerservices@moneybarn.com</u> or you can write to us at: Moneybarn, Athena House, Bedford Road, Petersfield GU32 3LJ.

7. Sharing your personal data

When necessary, we may share your personal data with:

- Service providers
- Tax, government, and other regulatory bodies
- Fraud prevention and law enforcement agencies
- Industry databases such as Cifas and National Hunter you can learn more about how these databases use your personal data here: <u>https://www.cifas.org.uk/fpn</u> and <u>https://nhunter.co.uk/privacy-policy</u>
- Prosecuting authorities and courts and other third parties connected with legal proceedings or claims
- Third parties where you have asked us to share your information
- Third parties where it is necessary to enter into or support the performance of a contract
- Third parties where we are required to do so by law
- Social media platforms for targeting and profiling purposes
- Credit Reference Agencies (CRAs) for performing credit, identity and fraud prevention checks against public information such as the electoral register and shared credit information

All companies we work with are assessed to ensure their security controls are satisfactory to ensure your personal data remains safe.

Please see the section **'Categories of supplier'** listing the categories of supplier we may share your data with for our business purposes.

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8. Transferring your personal data outside the UK & European Economic Area

Your personal data may be transferred to or stored in locations outside the European Economic Area (EEA) and the UK.

We will only transfer your data when:

- we're required or permitted to by law or regulatory requirements
- we're sharing data with a third party to support us with the management of your account.

When transferring data overseas, we make sure that suitable protection is always in place. This could be by:

- Ensuring that we transfer personal data to countries that the Information Commissioner (ICO) has confirmed provides the right levels of protection
- Putting suitable clauses in our contracts so that organisations take the right steps to give personal data the same protection it has in the EEA or the UK.

If you would like more information about protecting your data overseas, please visit <u>https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/international-transfers/</u>

9. Retaining your personal data

We will keep your personal data for as long as we need it, which for most data is usually for the time you are an active customer, plus a further 6 years.

We will keep your personal data for the following reasons:

- for the activities described in the section 'How we use your personal data'
- to meet our legal or regulatory obligations
- to handle any legal claims

If you would like more information on this, please visit the section 'Contact us'

10. Automated decision-making and profiling

There may be circumstances where we use your data to carry out automated decision-making and profiling. You can see more information about what automated decision-making and profiling is here: <u>Automated decision-making and profiling | ICO</u>

We've provided more information below about the different ways in which we may use automated decisionmaking and profiling.

We use automated decision making or profiling to:

Applications

• check that we can enter into an agreement with you



- carry out our legal and regulatory obligations (e.g., when complying with UK money laundering regulations)
- carry out credit scoring, which uses past data to assess how you are likely to act when paying back any money you borrow (this includes data about similar accounts you may have had before).

Account Management

- determine the appropriate action to take, where your account has gone into arrears or default
- place you in groups with similar customers. These are called customer segments. We use these to study
 and learn about our customers' needs, and to make decisions based on what we learn. This helps us to
 design products, services and offers for different customer segments, and to manage our relationships
 with them

Marketing Related Activities

• identify your suitability for products and services we offer and to inform you of these

Social Media

information we have obtained from external companies we work with, such as social media platforms, where we've asked them for groups of people who are similar to you or have interests that are like yours in some ways. These companies help us look for new customers who may be interested in products, services or offers that our existing customers are interested in. This helps us tailor the marketing that individuals receive or are shown on our own and other websites and mobile apps, including social media. It also helps us to design products, services and offers for different customer groups, and to manage our relationships with them.

We will tell you where we make such decisions, and you have the right to ask for these to be reconsidered manually.

11.Your data subject rights and how to exercise them

You have rights relating to the personal data we hold about you, but they may be subject to various exemptions and limitations. We recommend clicking the following link for more information on your rights: https://ico.org.uk/global/privacy-notice/your-data-protection-rights/

Your Rights

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Right to be informed: We provide you with data privacy notices throughout your relationship with us, so you can understand how we use your data.

Right of access to your personal data, commonly known as a Data Subject Access Request (DSAR): You can request a copy of the personal data we hold about you.

Right to request your personal data is corrected: If you believe that we hold inaccurate or incomplete personal data, you have the right to ask us to correct it for you.



Right to request your personal data is deleted: You may ask us to delete your personal data where there is no good reason for us to continue to hold it.

Right to object: You have the right to object to us using your personal data where:

- it is being used for a legitimate business need
- it is being used for direct marketing

Right to request we restrict using your personal data: You may ask us to stop using your personal data, if we agree, we will still hold the data but will not use it any further.

Right to data portability: In certain circumstances you may request that your personal data is transferred to another company.

Right to withdraw consent: If you have given us your consent to use your personal data for a specific activity, you may withdraw that consent at any time.

Right to make a complaint: If you wish to raise a complaint on how we have handled your personal data, you can contact DataRightsTeam@Moneybarn.com who will investigate the matter. If you are not satisfied with our response, you can complain to the Information Commissioner's Office (ICO) - <u>https://ico.org.uk/make-a-complaint</u>

How to exercise your rights

The simplest and quickest way is by completing our online request form: https://bit.ly/47took7

Alternatively, you can request to exercise your rights using the following method below:

- by phone: 0330 555 1230
- by email: customerservices@moneybarn.com
- by post: Moneybarn, Athena House, Bedford Road, Petersfield, Hampshire, GU32 3LJ

12. Making a data protection complaint

If you have any concerns about the use of your personal information or the way we handle your requests relating to your rights, you can raise a complaint directly with us by using the following contact details:

- by phone on: <u>0330 555 1230</u>

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- by email: compalints@moneybarn.com
- by post: Moneybarn, Athena House, Bedford Road, Petersfield, Hampshire, GU32 3LJ

If you are not satisfied with the way we handle your complaint, you are entitled to raise a complaint directly with the UK Information Commissioner's Office via the following link: <u>https://ico.org.uk/make-a-complaint</u>



13.Contact us

If you have any questions about how we collect, use, process, or share your data, please contact us by emailing DataRightsTeam@Moneybarn.com or you can write to us at this address: Data Rights Team, PO Box 399, Chatham, ME4 4WQ. Alternatively, you can contact our customer services team on 0330 555 1230.

14. Keeping this notice up to date

We regularly review and, where necessary, update the information contained within this notice. This notice was last updated on November 2023.

15. Categories of supplier

Communications providers- mail, email, and SMS providers **Credit Reference Agencies Customer Service Function providers Debt Collection Agencies Fraud Prevention Agencies** IT consultants IT service providers Legal Service providers Management consultants Market Benchmarking service providers Market research companies **Digital Marketing service providers** Direct Marketing service providers Marketing Insight service providers Other companies in the Vanquis Banking Group Payment processors **Professional Service firms Risk consultancy services** Software providers **Transcription Service providers** Web analytic service providers Web hosting service providers