

## **Privacy Policy**

### **Who we are and how to contact us**

Car Cash Point (CCP) registered office is Pitt House, 120 Baker Street, London, W1U 6TU; it is regulated by the Financial Conduct Authority 670218; and registered with the Information Commissioner's Office, in compliance with the Data Protection Act 1988 under registration Z2377293. CCP is committed to protecting the security of your information and takes reasonable precautions to protect it, in accordance with General Data Protection Regulation. CCP as data controller and our Data Protection Officer can be contacted at [info@carcashpoint.com](mailto:info@carcashpoint.com).

Your personal information will be held securely by CCP. CCP is the data controller of your information under data protection laws because, in the context of our business relationship with you, we decide how and why it is processed in the ways explained in this policy.

### **Where we obtain your information**

We will collect your personal information from you directly. This will include information you provide when you apply, and any additional information provided by you in various ways, including: originals and copies of financial and non-financial information for the purposes of affordability assessment, residential and personal identification; publically available registers (e.g. land registry, bankruptcy registers, electoral register, and AML checks); information we may receive from other organisations, whether in the course of providing products and services to you or otherwise; and information obtained during the course of our business relationship with you. This may also be from information we gather from your use of, and interaction with, our internet services and the devices you use to access them.

### **Data protection principles**

CCP will comply with data protection law. This says that the personal information it holds about you must be:

- Used lawfully, fairly and in a transparent way
- Collected only for valid purposes that it has clearly explained to you and not used in any way that is incompatible with those purposes
- Relevant to the purposes it has told you about and limited only to those purposes
- Accurate and kept up to date
- Kept only as long as necessary for the purposes we have told you about
- Kept securely

### **What kinds of personal information do we process?**

This will include:

- Your title, full name, your contact details, including for instance your email address and mobile telephone numbers
- Your home address and address history
- Your date of birth and/or age
- Your nationality

- A number or code given to you by a government to identify who you are, such as a National Insurance number
- Records of how you have contacted us and, if you get in touch with us online, details such as your mobile phone location data, IP address
- Personal information which we obtain from Fraud Prevention
- Some special categories of personal data such as about your health or if you are a vulnerable customer
- Your financial details e.g. your salary and details of other income, details of your savings, details of your expenditure, and details of account(s) held with other providers if you repay your loan from those account(s)
- Your bank account details and information
- Details about all of your existing borrowings and loans
- Information about your employment status including whether you are employed, retired or receive benefits
- Information about your occupier status, such as whether you are a tenant, live with parents or are an owner occupier of the property in which you live at the time of your application
- Information which is relevant for your residency and/or citizenship status, such as your nationality, your length of residency in the UK and/or whether you have the permanent right to reside in UK
- Your marital status or family circumstances, if relevant to the product (e.g. the number of dependents you have)
- Information about your devices and the technology you use

### **Use of collected information**

The information we collect about you will be used in the following ways:

- To verify your identity and credit standing and to enable us to consider and process your application for a loan or other products or services
- To assess your credit history and confirm your employment details
- To detect, prevent and investigate actual and potential fraud and related activities
- To collect unpaid loans and debt that may be owed by you to us
- To develop, manage and market products and services to meet your needs, to contact you for products and services that may be of interest, to determine your eligibility for different products and services that you may be interested in
- To help us to administer and service your account with us
- To contact you in connection with your enquiry
- To extract certain information for the purpose of generating statistics for our own internal purposes (including credit and/or behaviour scoring, and market and product analysis).
- To update our website to better meet our clients' needs in the future
- Sharing your information with third parties
- Sometimes (and with your approval where required), we'll share your information with carefully selected third parties outside our group. We may do this to provide you with a loan; to assist our agents, staff and approved third parties to carry out services for us; to facilitate the processing and collection of payments due from you under the loan agreement, we may also share your personal data with third party payment processing service providers. If you provide us with any debit card details we may keep those details, but will only ever take card payments on your specific authorisation

- To provide you with information about special promotions and offers
- To protect us or others, we may share your information with third parties when we believe it is necessary to comply with the law or protect our or another person's rights, property, or safety. This includes exchanging information with third parties (such as other lenders, law enforcement agencies and regulatory authorities) to protect against fraud and reduce risks
- If there is (or is to be) any change in ownership of our business or assets then we may wish to share your information so that the new (prospective) owners may continue to operate our business effectively and continue to provide services to our customers. This may include new shareholders or any organisation that might take an assignment or transfer of any agreements we have entered into with our customers.

### **What are the legal grounds for how we use your information?**

Data protection laws require us to explain what legal grounds justify us using your personal information (this includes sharing it with other organisations). The laws refer to “processing” of information – a term which includes everything we do with your personal information from its collection, right through to its destruction or deletion when we no longer need it. For some processing, more than one legal ground may be relevant (except where we rely on a consent). Here are the legal grounds that are relevant to us:

1. Processing necessary to perform our contract with you for your account, or for taking steps before entering into it, during the application stage:
  - a) Administering and managing your account and services relating to that, updating your records to contact you about your account and doing this for recovering debt;
  - b) All stages and activities relevant to managing your account including enquiry, application, administration and management of accounts and
  - c) For some of our profiling and other decision making as described in the relevant section below.
2. Where we consider that, on balance, it is appropriate for us do so, processing necessary for the following legitimate interests are:
  - a) Administering and managing your account and services relating to that, updating your records to contact you about your account and doing this for recovering debt;
  - b) To test the performance of our products, services and internal processes;
  - c) To adhere to guidance and best practice under the regimes of governmental and regulatory bodies such as the Financial Conduct Authority and the Information Commissioner’s Office;
  - d) For management and audit of our business operations including accounting;
  - e) Although not current CCP policy, to carry out searches at CRAs pre-application, at the application stage, and periodically after that;
  - f) To carry out monitoring and to keep records;
  - g) To administer our good governance requirements (such as internal reporting and compliance obligations);
  - h) For market research and analysis and developing statistics;
  - i) For some of our profiling and other decision making, in particular where this does not have a legal effect or otherwise significantly affect you; and
  - j) When we share your personal information with these other people or organisations;
    - Any person with power of attorney over your affairs (in each case only if relevant to you);
    - Our legal and other professional advisers and auditors;

- Financial institutions and trade associations;
- Governmental and regulatory bodies such as HMRC, the Financial Conduct Authority, and the Information Commissioner's Office;
- Tax authorities who are overseas for instance if you are subject to tax in another jurisdiction we may share your personal information directly with relevant tax authorities overseas (instead of via HMRC);
- Other organisations and businesses who provide services to us such as debt recovery agencies, back up and server hosting providers, IT software and maintenance providers, document storage providers and suppliers of other back office functions;
- Actual or prospective buyers or financiers and their professional and other advisers (including providers of insurance or ratings agents) in connection with any sale of financing transaction such as a restructuring or sale of our business or assets or any securitisation or other funding transaction;
- Credit Reference Agencies (not currently CCP policy); and
- Market research organisations who help us to develop and improve our products and services.

3. Processing necessary to comply with our legal obligations:

- a) For compliance with laws that apply to us;
- b) For establishment, defence and enforcement of our legal rights, or those of any other member of our group;
- c) For activities relating to the prevention, detection and investigation of crime;
- d) To carry out identity checks, anti-money laundering checks, and checks with Fraud Prevention Agencies pre-application, at the application stage, and periodically after that.
- e) To carry out monitoring and to keep records;
- f) To deal with requests from you to exercise your rights under data protection laws;
- g) To process information about a crime or offence and proceedings related to that (in practice this will be relevant if we know or suspect fraud); and
- h) When we share your personal information with these other people or organisations:
  - A person with power of attorney over your affairs;
  - Fraud Prevention Agencies;
  - Law enforcement agencies and governmental and regulatory bodies such as HMRC, the Financial Conduct Authority, and the Information Commissioner's Office; and
  - Courts and to other organisations where that is necessary for the administration of justice, to protect vital interests and to protect the security or integrity of our business operations.

4. Processing with your consent:

- a) When you request that we share your personal information with someone else and consent to that;
- b) For direct marketing communications;
- c) For some of our profiling and other decision making;
- d) For some of our processing of special categories of personal data such as about your health or if you are a vulnerable customer.

5. Processing for a substantial public interest under laws that apply to us where this helps us to meet our broader social obligations such as:

- a) Processing of your special categories of personal data such as about your health or if you are a vulnerable customer;
- b) Processing that we need to do to fulfil our legal obligations and regulatory requirements;

c) When we share your personal information with other people and organisations, if they need to know that you are a vulnerable customer and your relatives, social services, your carer or any person who has power of attorney over your affairs.

### **How and when can you withdraw your consent?**

As set out in the previous section, much of what we do with your personal information is not based on your consent, instead it is based on other legal grounds. For processing that is based on your consent (this is set out in point 4 of the previous section), you have the right to take back that consent for future processing at any time. You can do this by contacting us at [info@carcashpoint.com](mailto:info@carcashpoint.com). If you do, you should tell us which of the relevant uses you want to withdraw your consent to when you contact us. Withdrawal of your consent will not prevent our using your personal information where we are doing so on one or more of the other legal grounds.

### **Where we store your details**

We're based in the UK and will store it in the UK.

### **How do we share your information with fraud prevention agencies?**

We have systems that protect our customers and ourselves against fraud and other crime. Customer information can be used to prevent crime and trace those responsible. We'll share your personal information from your application with fraud prevention agencies. If false or inaccurate information is provided and fraud is identified, details of this fraud will be passed to these agencies. Law enforcement agencies may access and use this information.

### **What should you do if your information changes?**

You should tell us without delay so that we can update our records, by getting in touch at [info@carcashpoint.com](mailto:info@carcashpoint.com).

### **Do you have to provide the information to us?**

We are unable to provide you with an account or to process your application without having personal information about you. Your personal information is required before you can enter into the relevant contract with us, or it is required during the life of that contract, or it is required by laws that apply to us. If we already hold some of the personal information that we need – for instance if you are already a customer – we may not need to collect it again when you make your application. In cases where providing some personal information is optional, we will make this clear.

### **Do we monitor any of your information?**

In this section, where we refer to “monitoring” this means any listening to, recording of, viewing of, intercepting of, or taking and keeping records of calls, email, text messages, review web sites, social media messages and other communications.

We may monitor, where permitted by law, and we will do this where the law requires it. Some of our monitoring may be to comply with regulatory rules, self-regulatory practices or procedures relevant to our business, to prevent or detect crime, in the interests of protecting the security of our communications systems and procedures, to have a record of what we have discussed with you and actions agreed with you, to protect you and to provide security for you (such as in relation to fraud risks on your account) and for quality control and staff training purposes.

We may conduct short term carefully controlled monitoring of your activities on your account where this is necessary for our legitimate interests or to comply with our legal obligations. For instance, were we suspect fraud, money laundering or other crimes.

Telephone calls between us and you in connection with your account may be recorded to make sure that we have a record of what has been discussed and what your instructions are. We may also record these types of calls for the quality control and staff training purposes.

## **Marketing**

CCP will use your personal information so we can provide you with product details and offers that may be relevant to you. We might contact you by mail, telephone, email, or text message unless you have asked us not to.

## **Cookies Policy**

At CCP we use cookies to give you the best possible experience on our website. Cookies are text files stored on your computer, mobile or tablet, when you visit websites. Our cookie policy explains what types of cookie we use, why and how to identify and delete them. You can choose to delete or disable our cookies, but if you do this, some of our services may not work properly.

A 'cookie' is a piece of information that is held on your PC, which enables our website to recognise you on subsequent visits and allows us to tailor your visit to your specific requirements. As the 'cookie' is based on your PC we are unable to recognise you if you visit any of our websites from a different PC unless you register with us. If you do register then you will be able to login from any PC using your passcode. Car Cash Point's use of 'cookies' does not include the collection of any personal information regarding the use of your PC or internet browsing in any way. If you do not want a cookie to be created on your PC, web browsers such as Chrome, Netscape and Internet Explorer provide the option to disable them. Please note that some personalised services on this site may not be available if you choose to disable cookies.

We use cookies to help us analyse traffic on our site and customer behaviour. Cookies may also be used by our partners to understand marketing and traffic patterns. During the course of any visit to Car Cash Point, the pages you see, along with a cookie, are downloaded to your computer. Any information that is supplied by cookies can help us to provide you with a better service and assists us in analysing the profile of our visitors. Most web browsers automatically accept cookies, but normally you can alter your browser settings to prevent automatic acceptance, if you prefer. If you decline cookies, we cannot guarantee that your experience with our website will be as quick or responsive as if you do receive cookies. Alternatively, you may wish to visit [www.allaboutcookies.org](http://www.allaboutcookies.org), which contains comprehensive information on how to do this on a wide

variety of desktop browsers. We do not store passwords or any other information about a visitor in a cookie that could identify them, their location or their preferences.

## **IP addresses**

When you visit our website, regardless of whether you log in or not, our web servers automatically obtain your domain name, IP address and details about your device. These details reveal nothing personal about you. We use this information to investigate abuse of our website and its users, and to co-operate with law enforcement. We share this information with third parties, but only in aggregate.

## **Data anonymisation and use of aggregated information**

Your personal information may be converted into statistical or aggregated data which cannot be used to re-identify you. It may then be used to produce statistical research and reports. This aggregated data may be shared and used in all the ways described in this policy.

## **How long will we keep your information?**

Unless we explain otherwise to you, we will hold your personal information for the following periods:

- Retention in case of queries. We will retain the information that we need to keep in case you have a query;
- Retention in case of claims. We will retain the information that we need to keep for the period in which you might legally bring claims against us. In practice, this means up to 6 years after your agreement has ended; and
- Retention in accordance with legal and regulatory requirements. We will retain the information that we need to keep even after the relevant contract you have with us has come to an end for a further 10 years and this will be to satisfy our legal and regulatory requirements.

## **Accessing personal information we hold about you**

Subject to certain exceptions, you have the right of access to your personal records and information that we hold about you, upon written request.

## **Security and confidentiality**

Appreciating that both privacy and security of your information is of the utmost importance, we have implemented technology and security policies, rules and measures to protect the personal information we hold about you.

We endeavour to take all reasonable steps to protect your personal information. However, please be aware that there are inherent security risks of providing information and dealing online over the internet and we cannot therefore guarantee the security of any data disclosed online. We ask that you do not provide us with any sensitive personal information online unless we specifically ask for this.

## **Links to other sites**

This website may from time to time include links to other sites. We make every effort to provide links to high quality, reputable sites but we're not responsible for their privacy practices or, site content, or the services they offer. Please always check the privacy policies of any linked sites.

## **What are your rights under data protection laws?**

Here is a list of the rights that all individuals have under data protection laws. They do not apply in all circumstances. For example, there may be legal reasons, such as the need to prevent fraud or crime, for us to comply with our regulatory requirements or to perform the contract with you, which limit when they can be exercised. If you wish to exercise any of them, we will explain at that time if they are engaged or not.

- The right to be informed about your processing of your personal information;
- The right to have your personal information corrected if it is inaccurate and to have incomplete personal information completed;
- The right to object to processing of your personal information;
- The right to restrict processing of your personal information;
- The right to have your personal information erased (the “right to be forgotten”);
- The right to request access to your personal information and to obtain information about how we process it;
- The right to move, copy or transfer your personal information (“data portability”);
- Rights in relation to automated decision making which has a legal effect or otherwise significantly affects you.

If you are not satisfied with any aspect of the way that we process your information or fulfil our obligations, you have the right to complain to the Information Commissioner’s Office which enforces data protection laws: <https://ico.org.uk/>

## **What this privacy policy covers**

This policy only applies to personal information collected or obtained by Car Cash Point.

## **Changes to this privacy policy**

Car Cash Point may amend this privacy policy from time to time. This privacy policy was last updated on 25 May 2018.

## **Contact our Data Protection Officer**

Should you have any queries, complaints or require any information about this privacy policy then these should be directed to [info@carcashpoint.com](mailto:info@carcashpoint.com) or [complaints@carcashpoint.com](mailto:complaints@carcashpoint.com), or by post to Suite 3b, Lyttelton House, 2 Lyttelton Road, London N2 OEF.