

# Car Cash Point – Customer Privacy Policy

In this policy, we set out how **Car Cash Point** (“CCP”, “we”, “us” or “our”) uses your personal data as part of the application process. This Privacy Policy should be read carefully and considered in conjunction with the loan agreement terms and conditions.

## **Contacting us**

CarCashPoint Limited is registered in England and Wales with Companies House under Company no. 07345897, Registered Office Pitt House, 120 Baker Street, London, W1U 6TU.

You can contact us in writing at Suite 3b, Lyttelton House, 2 Lyttelton Road, London. N2 0EF or by telephone on 0800 774 7740.

As a 'Controller' of the personal data you provide to us, we are registered with the Information Commissioner's Office under registration reference Z2377293.

## **What information we collect, use, and why**

We collect or use the following personal information about you:

- Name(s)
- Contact details
- Address(es)
- Date of birth
- Payment details (including card or bank information for transfers and direct debits)
- Credit reference information
- Account information
- Vehicle registration and details (against which you wish to use to secure the loan)
- Website user information (including user journeys, IP addresses, and cookie tracking)
- Call recordings
- Identification documents
- Call recordings
- Financial transaction information (for the affordability assessment)
- Marketing preferences
- Records of consent, where appropriate

We collect and process this personal information to:

- provide the loan and associated servicing of the loan

- prevent crime, prosecute offenders, or defend against legal action
- service updates or marketing purposes

### **Lawful Basis of Processing**

CCP's lawful bases for collecting or using personal information include:

- Contract
- Legal obligation
- Vital interests
- Legitimate interests
- Consent (where applicable)

### **Special Category Data**

Some of the information we collect, and process is sensitive personal data (also known as special category data). In particular, we may process personal data that relates to:

- your health (such as your health circumstances which impact your ability to communicate with us or to manage your loan, or medical history)
- any criminal convictions and offences.

If we use sensitive personal data, we will usually do so on the conditions for processing:

- explicit consent has been obtained
- vital interest to safeguard you
- wider public interest, to establish, take, or defend any legal

### **Where we obtain personal information from**

- You directly
- Publicly available sources
- Third parties:
- Credit reference agencies (see later section on CRAs)

### **How we use your personal information**

We may undertake several publicly available online checks, including general name and address searches, land registry, bankruptcy/insolvency register, companies house, employment check, and Thompson Reuters to validate the information you have provided.

At this point, your loan may be refused (and you will be notified) or pre-approved subject to providing documents to support your application. If your loan is approved, we will maintain the information and update it with payments made, correspondence, and other administration as part of the loan repayment process.

### **Who we share information with**

To process your application and perform the contract, we will share your personal information with:

- Credit reference agencies
- Fraud prevention agencies
- Field agents
- Courts
- External advisors

### **CRA's**

As a responsible lender, CCP has a legal obligation to take steps to ensure that our customers are creditworthy. We use a variety of methods to try to make sure that we do not lend money to people who are in financial difficulty. One of these is to carry out a credit reference check. To do this, we shall pass the personal data that you provide to us in your loan application to a credit reference agency (CRA) called **Perfect Data Solutions Limited** which trades as **Lending Metrics**.

Lending Metrics provide us with data about a customer's credit history and borrowing habits. You can contact Lending Metrics at Lancaster Court, 8 Barnes Wallis Road, Fareham, Hampshire, PO15 5TU in writing to request the information that they hold about you (please note, a small statutory fee may be payable).

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 must be sure that you have their agreement to disclose information about them. CRA's also link your records together and these links will remain on your and their files until you or your partner successfully files for a disassociation with the CRA's to break that link.

Information on applications will be sent to CRA's and will be recorded by them. Where you borrow from us, we will give details of your accounts and how you manage it/them to CRA's. If you borrow and do not repay in full and on time, CRA's will record the outstanding debt. This

information may be supplied to other organisations by CRAs and FPAs to perform similar checks and trace your whereabouts and recover debts that you owe. Records remain on file for 6 years after they are closed, whether settled by you or defaulted.

### **FPAs**

We may use fraud prevention agencies to help us make decisions when deciding whether to approve a loan application. If false or inaccurate information is provided by you or fraud is identified you could be refused certain services and finance.

We will make checks such as assessing this application for credit and verifying identities to prevent and detect crime and money laundering.

To do this, we shall pass the personal data that you provide to us in your loan application to a fraud prevention agency (FPA) called **Equifax Ltd**. You can contact Equifax Ltd at Customer Service Centre, PO Box 10036, Leicester, LE3 4FS in writing to request the information that they hold about you (please note, a small statutory fee may be payable).

If you give us false or inaccurate information and we suspect or identify fraud we will record this and may also pass this information to FPAs, and other organisations involved in crime and fraud prevention. If you have borrowed from us and do not make payments that you owe us, we will trace your whereabouts and recover your debts.

### **Field Agents & Court**

We have a team of national field agents who visit each pre-approved applicant to obtain the documents required to formalise the loan. Your Bill of Sale paperwork then must be registered with the court. If you default on your loan, we may need to take possession of the vehicle and we have a team of recovery agents who would undertake this on our behalf. We never sell or share your information with third parties for marketing purposes.

### **External service providers and/or advisors**

We may share your information with third parties who help manage our business and deliver services. These third parties have contractually agreed to process your information confidentiality and restrictions apply to protect your data. These include IT service providers who help manage our IT and back-office systems, lawyers and consultants who support us with regulatory compliance, and auditors.

### **Automated Decision Making**

We use automated decision-making to reject applications where the vehicle to which the loan would be secured has a too low trade value.

### **How we protect and store personal information**

To protect your personal information, we have implemented and maintain appropriate technical and organisational security measures, policies and procedures designed to reduce the risk of accidental destruction or loss, or the unauthorised disclosure or access to such information appropriate to the nature of the information concerned.

Measures we take include:

- Limiting the access our staff have to your information to the minimum required to perform their duties

- Maintaining firewalls and security technologies to minimise the risk of external attacks upon our servers
- Employing clear desk policies
- Regularly monitoring our security systems.

### **Where your information is stored**

All our business information is stored within the European Economic Area (EEA). We have a customer management system (CRM) where all our loan applicant's information is securely stored. Emails and call recordings are held on a secure server. We may also hold a physical record of your account with us. These records are stored securely against the risk of loss.

### **How Long We Hold Your Information**

We will store your personal information for as long as is reasonably necessary for the purposes for which it was collected, as explained in this privacy policy. We retain your loan application information for seven years post-loan repayment. In some circumstances, we may store your personal information for longer periods, for instance where we are required to do so per legal, regulatory, tax, and/or accounting requirements.

### **Your Data Protection Rights**

Under data protection law, you have rights including:

- Your **right of access** - You have the right to ask us for copies of your personal data.
- Your **right to rectification** - You have the right to ask us to rectify personal data you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- Your **right to erasure** - You have the right to ask us to erase your personal data in certain circumstances.
- Your **right to restriction of processing** - You have the right to ask us to restrict the processing of your personal data in certain circumstances.
- Your **right to object to processing** - You have the right to object to the processing of your personal data in certain circumstances.
- Your **right to data portability** - You have the right to ask that we transfer the personal data you gave us to another organisation, or to you, in certain circumstances.
- Your right to **withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent.

You don't usually need to pay a fee to exercise your rights. If you make a request, we have one calendar month to respond to you. To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

### **How to complain**

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address is the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. Their helpline number: is 0303 123 1113 and their website is [www.ico.org.uk/make-a-complaint](http://www.ico.org.uk/make-a-complaint)

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