

USE OF YOUR PERSONAL INFORMATION

In providing you with our products and/or services, it is necessary for us to process your personal information ("your information").

We are what is known as the "controller" of the personal information which we gather and use; when we say "we" or "us" in this document, we mean UCFS Europe Company ("UCFS"), a public corporation, incorporated in the United States, limited by shares with paid up share capital. It is listed in the Delaware Secretary of State's Division of Corporations registry under file number 5260496. Its United States home office is at 865 Bassett Rd, Westlake, Ohio 44145. We are registered with the Information Commissioner's Office ("ICO") under registration number Z3534979.

Your Rights: Under data protection law, you are entitled to exercise any of the following privacy rights:

<http://www.experian.co.uk/crain/index.htm>.

- **Right to object:** You can object to our processing of your information.
- **Access to your personal information:** You can request access to a copy of your information that we hold, along with information on what personal information we use, why we use it, who we share it with, how long we keep it for and whether it has been used for any automated decision making. You can make a request for access free of charge.
- **Right to withdraw consent:** If you have given us your consent to use your information to send you marketing emails, you can withdraw your consent at any time or by clicking the "unsubscribe" link in any marketing email which you receive.
- **Rectification:** You can ask us to change or complete any inaccurate or incomplete personal information held about you.
- **Erase:** You can ask us to delete your information where it is no longer necessary for us to use it, you have withdrawn consent, or where we have no lawful basis for keeping it.
- **Portability:** You can ask us to provide you or a third party with some of the personal information that we hold about you in a structured, commonly used, electronic form, so it can be easily transferred.
- **Restriction:** You can ask us to restrict the personal information we use about you where you have asked for it to be erased or where you have objected to our use of it.
- **Make a complaint:** You can make a complaint about how we have used your information to us by contacting us, or to a supervisory authority - for the UK this is the Information Commissioner's Office, at <https://ico.org.uk/>.

- We will make searches about you with credit reference agencies ("CRAs") who will supply us with credit information, as well as information from the Electoral Register. The CRAs will record details of the search whether or not this application proceeds and this footprint may be seen by other lenders. We may use credit-scoring methods to assess this application and to verify your identity and prevent and detect crime and money laundering.
- Credit searches and other information which is provided to us and/or the CRAs, about you and those with whom you are linked financially may be used by UCFS and other companies if credit decisions are made about you, or other members of your household. This information may also be used for debt tracing and the prevention of crime and money laundering as well as the management of your accounts. Periodic searches may be conducted by us for these purposes.
- Where you borrow or may borrow from us, we may give details of your account and how you manage it to CRAs. If you borrow and do not repay in full and on time, we may tell CRAs who will record the outstanding debt. CRAs will hold your information for 6 years.
- To prevent or detect fraud, or to assist in verifying your identity, we may make searches of our corporate group's records and at fraud prevention agencies who will supply us with information. We may also pass information to financial and other organisations involved in crime and fraud prevention to protect ourselves and our customers. If you give us false or inaccurate information and we suspect fraud, we will record this. We, members of our corporate group, and other companies may also use this information if decisions are made about you or others at your address(es) on credit or credit related services or motor, household, credit, life or any other insurance facilities. It may also be used for tracing purposes and claims assessment.
- Information held about you by CRAs may already be linked to records relating to one or more of your financial associates. For the purposes of this application you may be treated as financially linked and your application will be assessed with reference to any "associated" records.
- Where any search or application is completed or agreement entered into involving joint parties, you both agree to us recording details at credit reference agencies. As a result an "association" will be created which will link your financial records and your associate's information may be taken into account when a future search is made by us or another lender unless you file a 'disassociation' with the CRAs.
- You can exercise your right of access to your personal records held by credit and fraud agencies by contacting them directly.

Please make all requests to exercise your privacy rights in writing to Data Protection Officer, UCFS Europe Company Connections House Unit 3, Station Road, Biggleswade, SG18 8AL, or by email to dpo@ucfs.net. We will not charge you for responding to a request from you to exercise your privacy rights, and we will respond to your requests in accordance with our obligations under data protection law.

How do we obtain your information? We will obtain your information:

- when you complete any form as part of your application for any of our products and/or services;
- from third parties including credit reference agencies, fraud prevention agencies and other organisations when you apply for a product or service (as set out below); and
- in the course of providing you with any of our products and/or services.

How we use your information: We will collect the following personal information: full name; residential address; address history; date of birth; employment history (inc. salary information and employment history); and bank account/payment card information.

We collect your information for the purposes of:

- evaluating your creditworthiness when deciding whether to approve your application for a products and/or service;
- providing any such products and/or service to you;
- processing and collect payments;
- providing you with statements;
- reporting to credit reference agencies and fraud prevention agencies (as set out below);
- resolving complaints; and
- undertaking analysis (including for developing creditworthiness criteria, product analysis and market research).

Credit Reference and Fraud Prevention Agencies: We provide information to Experian, and they will handle your information in accordance with their privacy notices which are available at:

Our legal basis for processing your information: We only use your information where it is permitted by the laws that protect your privacy rights. We only use your information where: (i) we have your consent (if consent is needed), for example your consent for us to send you marketing emails, noting that where you have given us your consent, you have the right to withdraw it; (ii) we need to use the information to comply with our legal obligations (for example, complying with anti-money laundering requirements); (iii) we need to use the information to perform a contract with you for the provision of our products and/or services to you; and/or (iv) it is fair to use the personal information either in our interests or someone else's interests, where there is no disadvantage to you – this can include where it is in our interests to contact you about products or services, market to you, or undertake analysis to improve our services). We will let you know our legitimate interests when relevant.

Automated Decision Making: We will not use any of your personal data in automated processes to make decisions about you.

Sharing your information with others: We may share your information with relevant third parties where: (i) you have given us your express consent to do so; (ii) it is necessary for the purposes of providing our products and/or services to you; (iii) it is necessary to allow us to meet or enforce a legal obligation; or (iv) where it is fair and reasonable for us to do so in the circumstances.

We will only share your personal information with third parties to the extent needed for these purposes.

We may share your information with:

- credit reference agencies and fraud prevention agencies (as set out above);
- law enforcement agencies;
- companies in our corporate group;
- companies who provide a service to us or process transactions including sub-contractors;
- our advisers (including accountants, lawyers and other financial or professional advisers);
- your professional advisors where you have expressly consented; and
- anyone to whom we transfer or may transfer our rights or obligations under this agreement.

Transferring your information abroad: We will transfer your information outside the European Economic Area ("EEA") to the United States of America. UCFS Europe Company is a US company with a UK branch. All the data (including personal information) is stored and processed on computers and servers of United Consumer Financial Services Company ("UCFS (USA)"), a commonly owned affiliated company physically located in the USA. UCFS (USA) has entered into the European Union ("EU") style model clauses with UCFS Europe Company. The EU style model clauses are recognised by the EU as providing adequate protection for the rights of data subjects in connection the transfer of their personal information outside of the EEA.

We may also need to transfer your information outside the UK to service providers, agents, subcontractors and regulatory authorities in countries where data protection laws may not provide the same level of protection as those in the EEA. We will only do so where we have put in place measures to ensure that your information is kept safe by carrying out strict security checks on our overseas partners and suppliers, backed by strong contractual undertakings approved by the relevant regulators such as the EU style model clauses. Alternatively, some USA based providers may be certified under the EU-US Privacy Shield which confirms they have appropriate measures in place to ensure the protection of your data.

Data Retention: We will never retain your information for any longer than is necessary for the purposes we need to use it for (including for the purposes of complying with our legal and regulatory obligations). Where you have applied for a product and/or service with us, regardless of whether your application is successful or not, we will retain your information for a period of 6 years from the end of the financial year in which you stopped receiving any products and/or services from us (or in which we informed you that your application was unsuccessful).