

## **Privacy Policy**

### **Your Personal Information and Privacy**

We believe you deserve the highest possible levels of service, security and protection when we collect and use your personal information.

This page explains how we collect, use, disclose, transfer and store any personal data we collect from you.

### **Who are we?**

LCC Capital is the trading style of Lease Car Credit Limited. Our registered address is: Heath End, Petworth, West Sussex, GU28 0JG.

You can see more information about us [here](#).

### **When will we collect your personal data?**

We will collect your personal information in two ways – when you apply for vehicle finance, and from third party organisations such as credit reference agencies.

### **Why and how do we use your personal data?**

Our 'Use of your personal information notice' shown below, which we include as part of the contract you receive and sign when you start an agreement with us, explains why and how we will use your personal information in full:

### **Use of your personal information notice**

#### **What we will do when you apply**

- Before we can supply you with services, goods or financing, we need to collect and process your personal information or 'data' so we can decide if we can accept you as a customer.
- 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.
- We'll take appropriate steps to make sure the personal information we hold on record for you is accurate. If at any point you believe the personal information we are holding and processing for you is incorrect, you can request to see this information, and have it corrected or deleted.
- If you wish to raise a complaint on how we have handled your personal data, you can contact our Data Protection Officer who will investigate the matter. If you are not satisfied with our response or believe we are not processing your personal data in accordance with the law, you can complain to the Information Commissioner's Office (ICO).
- Further details of the ways we collect and use your personal information is also provided in the credit agreement which is to be read in conjunction with this Use of Your Personal Information Notice.
- By giving us your personal information or using our services, you acknowledge that we will use and disclose your personal information in the manner described in this notice and in our Privacy Policy, available on our website.
- We give you choices about the ways we use and share your personal information, and we'll respect the choices you make.

## Use of your personal data

- All the personal data we hold about you will be processed by our staff in the United Kingdom. However, please be aware that your information may be stored on a cloud-based system with servers located within the European Union.
- We take all reasonable steps to ensure that your personal data is processed securely and more information on this can be found in our Privacy Policy, available on our website.
- We will only collect as much information as we need for specific, identified purposes, and we won't use it for any other purposes without obtaining your consent.
- We will collect the following types of information about you; name, date of birth email address, mailing address, phone number, employer name, take-home pay, and banking information (such as bank routing number, debit card number and account number).
- Please see the following list of types and times when we will collect information from you:
  - information collected directly from you through your online application, information collected through online forms or entries on our lead providers'/and/or associated group companies' websites, or information you provide when you contact our customer services department
  - your telephone, email or other electronic communications with us (for example when speaking to our Customer Services Team), which may be monitored and recorded
  - information about your health or mental capacity. This information will be held so that we can comply with our obligations to you
  - information about your transactions including loan balances
  - information from outside sources such as credit reference agencies and customer service providers regarding credit worthiness and credit history
  - information about your visits to our website, and information we collect when you use the website
  - information about you when you use our feedback form
  - information regarding your questions about our programmes with associated group companies.
  - information about your computer, including your IP address, operating system and browser type. This is statistical data about browsing actions and patterns and is not in individually identifiable form. We also collect automatic information obtained by using "cookies" when your browser accesses our website and when you log-in. Further information can be found in our Privacy Policy, available on our website
  - information at credit reference and fraud prevention agencies and that of your 'financial associate' if you have one, i.e. a person with whom you have, or have had, joint personal financial arrangements such as joint accounts or have made joint credit applications. It may be your spouse or partner (not a business partner). We may also, in certain limited circumstances, check the record, including credit details, of other members of your family and, if you are a director or partner in a small business, we may also check on your business or seek information from your employer

- If you tell us that you have a financial associate, we will search link and record information about you both at credit reference and fraud prevention agencies. You must be sure you have your financial associate's agreement to disclose their information.
- We and fraud prevention agencies may also enable law enforcement agencies to access and use your personal data to detect, investigate and prevent crime.
- 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. If we, or a fraud prevention agency, determine that you pose a fraud or money laundering risk, we may refuse to provide the services and financing you have requested, or we may stop providing existing services to you. You have rights in relation to automated decision making: if you want to know more please contact us using the details provided later in this notice.
- We will add to your record with the credit reference agencies details of your Agreement with us, the payments you make under it, any default or failure to keep its terms and any change of name or address.
- Account information given to credit reference agencies remains on file for 6 years after the account is closed, whether settled by you or upon default, except where we legitimately believe a longer period is necessary.
- If we have reasonable grounds to believe that our asset is at risk, we may conduct credit reference agency, motor insurance database and fraud prevention agency searches, to confirm or establish your contact details, insurance cover, and to assess or manage our risk.
- We may pass your personal information to local authorities, councils, or other similar local government agencies in pursuing their or our legitimate interests.
- The personal information we hold about you will be disclosed to our funders and may be disclosed by them to their funders and in each case to their professional advisors. It may also be used for statistical analysis, testing, marketing and training purposes, both internally and externally.

We may also request that you provide details of individuals who are able to act as referees on your behalf by verifying some of the personal information you provide about yourself. The information we collect about these third parties may include their name, address, and phone number.

#### **How we and others may use and share your information**

- We use your personal information for the following purposes:
  - in the normal course of our business to provide you with the services or products you request such as processing loan transactions and updating your account records
  - to contact third parties, such as your employer, who you have nominated to verify information about yourself
  - to enhance your experience of using our website or our services
  - for conducting statistical analysis

- 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
- to identify which of our products might interest you
- for other regulatory checks including credit assessment
- to produce aggregated information about customers for editorial or feedback purposes for our advertisers.
- Whether or not your application with us proceeds, the credit reference agencies will place a record of our search on your credit file. This record (but not our name) will be seen by other organisations when you apply for credit in the future. A large number of applications within a short period of time could affect your ability to obtain credit.
- The agencies will link your records and those of your financial associate(s), including any previous and subsequent names. These links will remain on your and their files until you or they tell the agency you are no longer financially linked, and the agency accepts this.
- The agencies supply us with credit information, such as previous applications, the conduct of accounts in your and your financial associate(s) name, any business accounts you have, fraud prevention information and public information such as County Court Judgments, bankruptcies and the Electoral Register entries.
- Whether or not your application with us proceeds, 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.
- 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.
- 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
  - 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
  - assess that the vehicle you have agreed to purchase from us pursuant to the terms of the agreement is fully insured under a comprehensive insurance policy.
- We will also share the personal information you submit with our associated group companies (which includes any company linked to us in some way by common ownership or management) for the purposes of: (a) the provision of products and service you request and (b) consumer profiling and market research. A list of

associated companies is available on request by contacting us directly via the contact details provided below.

- We will share your information with our associated group companies for the following administrative activities:
  - Managing your relationship with us and notifying you of any changes to those products
  - Responding to your queries and complaints
  - Administering offers, competitions and promotions
  - Undertaking affordability reviews
  - Updating, consolidating and improving the accuracy of our records
- In addition, we will share your information with our associated group companies for the following data usage:
  - Transactional analysis
  - Arrears and debt recovery and debt sale activities
  - Crime detection, prevention and prosecution
  - To evaluate the effectiveness of marketing, and for market research and training
  - To support customer modelling, statistical and trend analysis, with the aim of developing and improving products and services
  - To enable assessment of lending risks
- By sharing this information, it enables our companies to better understand your needs and run your account(s) in the efficient way you expect.
- We will share your personal information with third parties under the following circumstances:
  - with lenders, credit reference agencies, customer service providers and collection agencies. We have trusted relationships with these carefully selected third parties who perform services on our behalf. All service providers are bound by contract to maintain the security of your personal information. Credit reference agencies may add to their records about you, information about our search of their records and your application with us, and this will be seen by other organisations that make searches
  - with a purchaser, in the event our business or all its assets are acquired by a third party (in which case personal information held about customers will be one of the transferred assets)
  - to enforce any of our terms and conditions
  - 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
  - with individuals who you nominate as your referees to verify certain information that you provide to us

- if required or compelled to do so by any legal authority, as required by law or when we believe that disclosure is necessary to protect our rights and/or to comply with a judicial proceeding, court order, or legal process served on us
- with other third-party service providers, who act as agents to perform tasks on behalf of and under the instructions of LCC Capital. These service providers must agree to use personal information only for the purposes for which they have been engaged by us and must either: (1) comply with mechanisms permitted by the European data protection law(s) for transfers and processing of personal information (including contractual obligation under the EU model clauses); or (3) agree to provide adequate protections for the personal information that are no less protective than those set forth in this notice.
- 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.
- We will also share your information with local authorities, councils, government and law enforcement agencies if a formal request is received. The use of your data by any of these parties will be governed by data protection and other relevant laws.
- Information held and obtained by us in relation to you will be passed to our agents for the purposes of taking enforcement action against you and/or a third party pursuant to our rights under the Agreement.
- We will also pass your details and information obtained on you if we transfer/assign our rights and duties in this Agreement to the transferee and/or its professional advisors, and may do so in advance of any transfer to assist in preparation for a transfer.

We will share your information with your bank and other agencies to the extent necessary, and to perform checks for the prevention of fraud, to verify your banking details, and to validate your identification.

#### **How long we keep your personal data**

We will generally keep your personal data for a minimum of the term of your loan agreement with us plus 7 years, after which time it will be destroyed if it is no longer required for the lawful purpose(s) for which it was obtained. If you consent to us using your data for Marketing, any information we use for this purpose will be kept with us until you notify us that you no longer wish to receive this information.

#### **More information about your rights**

You have the following rights with respect to your personal data:

- The right to access information we hold on you.
  - At any point you can contact us to request the information we hold on you, including details of why we have that information, who has access to the information, and where we obtained the information from. Once we receive your request we will respond within one calendar month.
  - There are no fees or charges for the first request but additional requests for the same data may be subject to an administrative fee of £25 per request.
- The right to correct and update the information we hold on you.

- If the data we hold on you is out of date, incomplete or incorrect, you can inform us, and we will update your data.
- The right to have your information erased.
  - If you feel we should no longer be using your data or that we are illegally using your data, you can request us to erase some or all the data we hold for you.
  - When we receive your request, we will confirm whether the data has been deleted or explain the reason why it cannot be deleted (for example we will need to keep the data because we have a legitimate interest or to comply with regulations).
- The right to object to processing of your data.
  - You have the right to request that we stop processing your data. When we receive your request, we will confirm if we are able to comply or explain why we have legitimate grounds to continue processing your data. Even after you exercise your right to object, we will continue to hold your data to comply with your other rights or to bring or defend legal claims.
- Right to restrict processing
  - In some circumstances, you can ask LCC Capital to restrict how they use your personal data. Your rights are set out at Article 18 of the GDPR. You can find our contact details above. This is not an absolute right, and your personal data may still be processed where certain grounds exist. This is: With your consent; For the establishment, exercise, or defence of legal claims; For the protection of the rights of another natural or legal person; For reasons of important public interest. Only one of these grounds needs to be demonstrated to continue data processing. LCC Capital will consider and respond to requests it receives, including assessing the applicability of these exemptions.
- The right to data portability.
  - You have the right to request that we transfer some of your data to another controller. We will comply with your request, where it is feasible to do so, within one month of receiving your request.
- The right to withdraw your consent for us to hold, process or share your data, where we sought your consent to collect and use it.
  - You can withdraw your consent easily by telephone, email, or by post (see the contact details provided earlier in this notice).
- The right to lodge a complaint with the Information Commissioner's Office (<https://ico.org.uk/make-a-complaint/>)

When exercising any of the rights listed above, to process your request we will need to verify your identity for your security.

We can amend the terms of this privacy notice or the terms of our privacy policy and if we do so we will make you aware of any such changes by posting a note on our website at [www.lcccapital.co.uk](http://www.lcccapital.co.uk)

Alternatively, please contact our Data Protection Officer by emailing [info@lcccapital.co.uk](mailto:info@lcccapital.co.uk) or you can write to us at this address: Data Protection Officer – LCC Capital, Heath End, Petworth, W. Sussex, GU28 0JG

**Direct Marketing**

If you consent to direct marketing we may contact you by post, email, telephone or mobile text and/or messaging service (SMS) about LCC Capital 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 01798 667677, or by emailing [info@lcccapital.co.uk](mailto:info@lcccapital.co.uk) or you can write to us at: LCC Capital, Heath End, Petworth, W. Sussex, GU28 0JG.

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### **Sharing your personal information with credit reference agencies**

In order to process your application, we will supply your personal information to credit reference agencies (CRAs) and they will give us information about you, such as about your financial history. We do this to assess creditworthiness and product suitability, check your identity, manage your account, trace and recover debts and prevent criminal activity. We will also continue to exchange information about you with CRAs on an ongoing basis, including about your settled accounts and any debts not fully repaid on time. CRAs will share your information with other organisations. Your data will also be linked to the data of your spouse, any joint applicants or other financial associates.

The identities of the credit reference agencies (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:

- Callcredit: <https://www.callcredit.co.uk/crain>
- Equifax: <https://www.equifax.co.uk/crain.html>
- Experian: <http://www.experian.co.uk/crain/index.html>

### **How long will we and other agencies keep your personal information?**

We will generally keep your personal data for a minimum of 7 years after your financial agreement with us has ended, after which time it will be destroyed if it is no longer required for the lawful purpose(s) for which it was obtained.

If you consent to us using your data for marketing, we may keep your data for direct marketing purposes for up to 7 years after your contract has ended with us, unless you change your preferences and opt-out of direct marketing (which you can do at any point). Information we've given to our credit reference agencies will also remain on their files for up to 6 years after your agreement with us has ended, whether you settled or reached the natural end of the agreement or because we terminated the agreement due to default, except where we or they legitimately believe a longer period is necessary.

### **Your right to ask us to transfer your personal information to another company or data controller**

You can ask us to provide you with the personal information we hold about you in a structured, commonly used, machine-readable form, and/or ask us to your personal data to another company or data controller. If you want to do this, please contact us using the details shown on this page.

### **Your right to be forgotten or have us delete your personal data**



You have the right to ask us to delete personal information we hold for you. It may be necessary for us to keep some of the data we hold for you for legal and regulatory purposes, so if you want to do this, you should contact our Data Protection Officer using the details above, so we can investigate your request and confirm what we are able to remove.

#### **What happens if you or we identify an issue with how your personal data has been used?**

We have processes in place which mean we will fully investigate any issues identified with the use or sharing of your data immediately and we will inform you so you're aware and confirm what we will do to put things right.

If you identify an issue, please contact our Complaints team at [complaints@lcccapital.co.uk](mailto:complaints@lcccapital.co.uk) or call our team on 01798 667677 to tell us about the issue so we can investigate and confirm what has gone wrong and what we will do to put things right.

#### **What can you do if you want us to stop processing your personal data?**

You can also object to our processing of your personal data. Please contact us using the details shown on this page, providing details of your objection. Please note that if you wish to exercise this right, we may be unable to process your application any further (including any in-flight applications) or continue to provide our services to you.

If you are unhappy with the way we are processing your personal data, you also have the right to complain to the UK Information Commissioner's Office. Their contact details can be found online at this link: <https://ico.org.uk/global/contact-us>.

#### **Using our website**

##### **What personal information do we collect when you browse our website?**

In addition to the personal information we collect from you when you apply for vehicle finance with us, when you use our website we will automatically collect information about your computer, including, where available, your IP address, operating system and browser type.

This is statistical data about browsing actions and patterns and does not identify you as an individual.

##### **The Use of Cookies**

We may also collect information about your general internet usage by using a cookie file, which is stored on the hard drive of your computer. Cookies enable us to improve our service to you, estimate our online audience size and website usage patterns, store information about your preferences and recognise you when you return to our site.

You can change your web browser settings to refuse cookies, but if you do this you may not be able to enjoy full use of our site, and you may not be able to take advantage of certain promotions we may run from time to time.

For more information on how to control or delete cookies, please visit [www.aboutcookies.org](http://www.aboutcookies.org).

##### **When you contact us**

##### **Recording of communications**

All calls, emails and LiveChat conversations to and from us may be recorded and monitored so we can check the quality of the service we provide, and we may use the recordings for employee training. We may also share the recordings with third party organisations to help us combat fraud and money laundering.

LCC Capital is the trading style of Lease Car Credit Limited, a company registered in England and Wales with company number 9656258. The registered address for the company is: Lease Car Credit, Heath End, Petworth, W. Sussex, GU28 0JG.  
Lease Car Credit Limited's VAT registration number is 247 2633 04.  
Lease Car Credit Limited is authorised and regulated by the Financial Conduct Authority (Financial Services reference No. 724459)

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