

## Privacy Policy

### 1. Purpose

- a. The purpose of this policy is to outline how we, Castle Credit Finance Ltd, use your data, how it's protected, how long it's stored for and more.
- b. As a vehicle finance broker, the main purpose of us obtaining your information is to try to obtain you an acceptance with one of our lenders.
- c. If at any time, you have any questions regarding how we use your information or this policy, please use the below details to contact us –
  - **Telephone: 01296 640597**
  - **Email: [info@castlecreditfinance.co.uk](mailto:info@castlecreditfinance.co.uk)**
  - **Address: Castle Credit Finance Ltd, 1 Crossways Business Centre, Bicester Road, Kingswood, Aylesbury, Buckinghamshire, HP18 0RA**
  - **FAO: Trina Clark - Director**
- d. Please note that for the purpose of holding personal data, we are registered with the Information Commissioner's Office, registered number: **Z5991899**

### 2. Why do we collect and use your personal data?

- a. We collect and use your personal information in order for us to provide you with vehicle finance via our application form and potential from third parties and dealerships who you have applied too.
- b. We act as a data controller.
- c. The lawful basis of which we use your information is consent, we will not process your information without your explicit consent.
- d. We gain this information by you agreeing to our terms of business and privacy policy when you make an application.
- e. We kindly ask that if you do not want us, or do not consent to us using your information, you do not submit an application to us.
- f. You can exercise your right to withdraw your consent at any time using our contact details listed above.
- g. We will not use your data for any other purposes without informing you and gaining your consent.
- h. The information we collect can be some or all of the following –
  - Name
  - Date of Birth
  - Residential Information
  - Employment and Income Information
  - Marital Status
  - Vehicle Information
  - Bank Details
  - Marketing Preferences (should you opt in, you will have the ability to opt out at anytime, you can also contact us on the above to do so)

- IP Information
- i. We will never request sensitive information, or information that we do not require from yourself.
- j. If you do not provide us with your data, we may not be able to provide you with our services.
- k. Please note communications will be recorded and/or saved for record.

### 3. What happens if I do not provide my personal information?

- a. We need your personal information to process your request or finance application. If we do not collect your personal information, we will not be able to provide our services to you.
- b. We will use your personal information to send you marketing communications by email about similar products and services that you may be interested in.
- c. Please note that we will not send you marketing information with your consent.
- d. You have the right to object to receiving marketing communication and we will give you an easy way to unsubscribe from receiving any marketing communication from us.

### 4. Who will we share your personal information with?

- a. We will share your information with the lenders with whom we work with in order to assist you gain an acceptance, these include the below –
  - i. **Billing Finance** - <https://billingfinance.co.uk/privacy-policy/> <https://billingfinance.co.uk/fair-processing-notice/>
  - ii. **Moneybarn** - <https://www.moneybarn.com/privacy-policy/>
  - iii. **Specialist Motor Finance** - <https://www.smfmotor.com/privacy-notice/>
  - iv. **Advantage Finance** - <https://www.advantage-finance.co.uk/home/useofdata.asp>
  - v. **Moneyway/V12 Finance** - <https://www.moneyway.co.uk/privacy-statement>
  - vi. **Oodle Finance** - <https://www.oodlecarfinance.com/privacy-notice>
  - vii. **Paragon** - <https://www.paragonbank.co.uk/data-protection>
  - viii. **Ratesetter** - <https://www.ratesetter.com/privacy>
  - ix. **Motonovo Finance** - <https://customer.motonovofinance.com/privacy>
- b. Your information will be held on our CRM system, AutoConvert (Blue Owl Network Ltd). You can view their privacy policy here - <https://www.autoconvert.co.uk/privacy-policy/>. This organisation will check the following records about you and with their chosen Credit Reference Agencies (CRA), Equifax Ltd and Experian Ltd. We will make checks such as; assessing this application for credit and verifying identities to prevent and detect crime
- c. When Equifax and/or Experian receives a search request from us via AutoConvert, they will place a soft quotation footprint that will be visible to you only, on your credit file; other parties including lenders will not see this. This quotation footprint will not be seen by other parties and it will not affect

your credit score/rating or ability to apply for finance from other lenders (please note that when lenders conduct these searches with CRA's, it may leave a footprint). AutoConvert will access from Equifax Ltd and/or Experian Ltd both public (including the electoral register) and shared credit and fraud prevention information. This information will be used to check your eligibility against a select group of lenders

- d. We will not see any information on your credit file, AutoConvert will only provide a list of lenders that you are likely to be accepted for given the information supplied using their brokering technology that understands most of the acceptance criteria of the lenders on their panel.
- e. 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.
- f. You can contact CRA's on the below:

*Equifax Ltd, Customer Services Centre, PO Box 10036, Leicester, LE3 4FS or call 0800 014 2955 or visit [www.equifax.co.uk](http://www.equifax.co.uk)*

*Experian Ltd, The Sir John Peace Building, Experian Way, NG2 Business Park, Nottingham, NG80 1ZZ, UK <https://www.experian.co.uk/contact-us/>*

- g. For further information on Credit Reference Agencies and how they will use your data, please refer to their Credit Information Notice: <https://www.experian.co.uk/legal/crain/> - [www.callcredit.co.uk/crain](http://www.callcredit.co.uk/crain) - [www.equifax.co.uk/crain](http://www.equifax.co.uk/crain)
- h. The personal information we have collected from you will be shared with fraud prevention agencies who will use it to prevent fraud and money-laundering and to verify your identity. If fraud is detected, you could be refused certain services, finance or employment. Further details of how your information will be used by our finance partners and these fraud prevention agencies, can be found in the above privacy links.
- i. Please also note that in order to complete your finance agreement, we will require some information from the supplying dealership.
- j. In order for them to raise the necessary paperwork, we will need to send them your name, address and contact number. We may also liaise with them regarding any future aftersales issues where required.
- k. If required, we will also share your information with 3<sup>rd</sup> parties for accounting, legal or regulatory purposes such as (but not limited too HMRC, FCA etc.)
- l. Please note we as a company do not share your data outside of any EEA state. We ask you to ensure you are aware of how the above companies share and use your data, so you are fully aware.
- m. We complete due diligence on any third party with whom we work with to ensure they comply with GDPR and are happy to provide further information or answer any questions you may have.
- n. Business we do not control - Our website features the products and services of third party providers. Where a service is to be provided by a third party, for example our motor loan, warranties, insurance, car data check and value of your car, your information will be shared with that third party for purposes of delivering that service to you. You will be able to tell when a third party is involved in your transactions and when your customer information is shared before you submit any information, you will be notified and then it is up to you whether or not you want to provide it. Where you purchase products or services or provide information or access another website through our website, use of any information collected is subject to the

privacy policy of the operator of the site you are visiting or the provider of such products or services. We are not responsible for the data protection practices of those other sites. This privacy policy applies solely to information collected on this website. We encourage our users to read the privacy policies of each and every website that collects personally identifiable information. That privacy policy may differ from ours. If you cannot find the privacy policy and require more information, please contact the provider directly.

- o. Sale of Business - The business is sold or integrated with another business, your details may be disclosed to our advisers and any prospective purchasers and their advisers and will be passed on to the new owners of the business.

#### **5. How long will we store your personal information?**

- a. We will store your personal information for up to six years on our CRM systems. We are committed to ensuring your data is kept secure so review our security systems on a regular basis.
- b. This is to enable us to refer to our records should we be required to for the purpose of regulatory or lawful reasons.
- c. If you do not object to receiving marketing communications from us, we will store your personal information for marketing purposes until you unsubscribe from receiving marketing communications from us.
- d. Please note that some of your information may be included in information used for accounting purposes. Where this is the case this information is kept for 7 years as per our legal requirements.
- e. Once this time period has ended, your information will be confidentially destroyed and removed from all systems and records.

#### **6. What are your rights to your personal information?**

##### *Right to access*

You have the right to request copies of the personal information we hold about you at any time.

##### *Right to rectification*

You have the right to request that we correct any inaccurate personal information we hold about you.

##### *Right to erasure*

You have the right to request that we delete your personal information from our records.

Please note that we will not be able to delete your personal information whilst we are still providing our services to you. We will be able to delete your personal information once you cancel the service or once the service is completed, if we are able to do so with still abiding by law.

*Right to restrict processing*

You have the right to request that we restrict how we use your personal information.

*Right to object*

You have the right to object to the collection and use of your personal information at any time.

*Right to data portability*

You have the right to obtain a copy of your personal information in a legible and compatible format such as Excel or Word.

*Right to be informed*

You have the right to be fully informed regarding your information throughout our whole journey

*Rights in relation to automated decision making and profiling.*

If a decision has been made electronically, you have the right to contest this decision.

**7. How can I exercise my rights in relation to my personal information?**

- a. You can exercise all of your rights by contacting us on any of the above contact details.

**8. How do I lodge a complaint about the use of my personal information?**

- a. You can lodge a complaint with us directly by contacting us on one of the above contact details.
- b. You also have the right to lodge a complaint directly with the Information Commissioner's Office (ICO).
- c. The ICO are the regulator who makes sure that we use your personal information in a lawful way.
- d. You can lodge a complaint with the ICO by following this link <https://ico.org.uk/concerns/> or calling the ICO on 0303 123 1113.

**9. Cookies**

- a. Our site may operate cookies and its important for us to make you aware how these are used so please do ensure you are aware of our Cookies Policy which can be found on our site.

b. You will be asked if you agree to these cookies when using our site, you have the right to refuse these Cookies.

**10. Review**

- a. This policy will be reviewed on at least an annual basis and was last updated on 8<sup>th</sup> June 2022.
- b. Any updates will be reissued as soon as is physically possible with the approval of our Director and Senior Management team.