

# PRIVACY POLICY

## Privacy and cookies notice

### 1. About this notice

We understand that your privacy and the security of your personal information is extremely important. This notice sets out what we do with your personal information, what we do to keep it secure, from where and how we collect it, as well as your rights in relation to the personal information we hold about you.

This policy applies if you interact with us through visiting our showroom, over the phone, online, through our mobile applications or otherwise by using any of our websites or interacting with us on social media (our "Services").

### 2. Who are we?

References to "we", "us" and "our" in this policy are all references to "Freedom Vehicle Contracts Limited" and our subsidiaries.

Freedom Vehicle Contracts Limited and its subsidiaries are committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using the website, then you can be assured that it will only be used in accordance with this privacy statement. Freedom Vehicle Contracts Limited and its subsidiaries may change this policy from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes.

### 3. What sort of personal information do we hold?

'Personal data' is defined in the Data Protection Law and is essentially information from which an individual person can be identified. By submitting information and/or continuing to use the Online Facilities, you signify your consent to us using your personal data in accordance with the below.

- Information that you provide to us such as your name, address, date of birth, telephone number, email address, bank account and payment card details and any feedback you give to us, including by phone, email, post, or when you communicate with us via social media;
- Information about the services that we provide to you (including for example, the things we have provided to you, when and where, what you paid, the way you use our products and services, and so on);
- Information required to make decisions about your application for products and services offered by Freedom Vehicle Contracts and any of its intermediaries such as your employment details, financial position, information taken from identification documents such as your passport or driving licence, your insurance, criminal and medical history, and details about additional insured parties and cardholders or joint policyholders; and
- Your contact details and details of the emails and other electronic communications you receive from us, including whether that communication has been opened and if you have clicked on any links within that communication. We want to make sure that our communications are useful for you, so if you don't open them or don't click on any links in them, we know we need to improve our service

#### 4. Our Legal basis for processing your personal Information

- Whenever we process your personal information, we have to have something called a “legal basis” for what we do. The different legal bases we rely on are:
- **Consent:** You have told us you are happy for us to process your personal information for a specific purpose;
- **Legitimate interests:** The processing is necessary for us to conduct our business, but not where our interests are overridden by your interests or rights;
- **Performance of a contract:** We must process your personal information in order to be able to provide you with one of our products or services;
- **Prevention of fraud:** Where we are required to process your data in order to protect us and our customers from fraud or money laundering;
- **Vital interests:** The processing of your personal information is necessary to protect you or someone else’s life;
- **Public information:** Where we process personal information which you have already made public;
- **Legal claims:** The processing of your personal information is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity; and
- **Legal obligation:** We are required to process your personal information by law

#### 5. How we use your personal data?

- There are a number of ways in which we use your personal information, depending on how you interact with us. If you do not provide your information to us, then we will be unable to interact with you in that way. Use of services accessed through the Online Facilities may require you to provide specific types of information. We request that the information you provide is as accurate as possible as this allows us to provide a personalised service when you enquire with us.
- We may use information about you for the following primary purposes:
- **To provide our products and services,** we need to use your personal information to make our products and services available to you. On applying for a finance or lease product via our Apply Now service, your information will be used to conduct a credit search initially. More information will be provided before in the application process. If you then decide to proceed to order any of our products or services then we’re delighted, thank you. After that, we need to provide them to you, process your payment and sometimes follow up on your purchase.
- **Contacting you** to discuss and further your enquiry, perform a credit check, conduct marketing research or offer you products and services specifically in relation to your enquiry with us. We will NEVER share your financial information with other third parties for any reason other than processing transactions, fraud and credit check protection, unless we have your consent. We may also contact you by email, phone, text or post during the various stages of your enquiry or renewal.
- **To personalise your experience,** we may send promotional emails about new products, special offers or other information which we think you may find interesting using the email address which you have provided at opt in stage.
- **For safety and security** - we use your personal information to help provide safe and secure environments for our colleagues to work in, our customers to visit us in and for our business to be conducted. To enable this we use CCTV, monitor or record telephone conversations, monitor online behaviour and carry out checks to help us ensure that our customers are genuine to prevent fraud, train our staff and to help customers receive a consistent level of care use our services appropriately.

- **For legitimate interest** - we will offer you renewal information in order to pursue our legitimate interests as a business and continue to offer you a high level of service throughout your agreements with us.
- When you complete an enquiry using our online forms or you enter one of our giveaways, we receive your information. We require this information to understand your needs and provide you with a better service. Submission of an enquiry to Freedom Vehicle Contracts grants us/and/or our Finance Partners authority to carry out searches, as detailed within this policy. Details supplied by you to enter a competition are only used by Freedom Vehicle Contracts and will not be released to any 3rd party.

## 6. Who do we share your information with?

We will only share your personal and business information from your application form in certain circumstances with the other companies we are associated with so that we can provide you with a high quality, personalised and tailored service (including relevant marketing) across our Group.

- Finance partners/supplying dealers -We may discuss your application and/or your agreement with our supplying dealers or Finance Partners. We may ask you to provide physical forms of identity verification or search the files of credit reference agencies which will keep a record of our or our partner's search, if your application proceeds to verify your finance application. Our lenders also have individual privacy notices which can be found online or in your finance documentation.
- Companies that enable us to collect your reviews and comments, both online and offline such as Trust Pilot
- Our Finance Partners and the credit reference agencies will also use the records for statistical analysis about credit. We do not sell or pass on your details to any third party for marketing purposes.
- If you agree to any of the products offered by our third-party providers, such as GAP insurance and maintenance providers, we will share your information in order to follow and evidence regulatory process and / or to process products and services supplied by them.
- To help check the information you've provided, accurately assess your suitability and prevent fraud, we and our partners may exchange information through various databases as detailed in our Privacy Notice.
- We may provide information to law enforcement and other agencies in the pursuit of their enquiries and to those with power to require us to provide such information. Where we share your personal information with third parties, we will take reasonable steps to ensure that it is properly protected and processed in accordance with this Policy and will not share financial data unless we need to for processing purposes of an application.  
If you require additional information on who we have shared your data with and for what purpose, please contact us using the details in section 13.

## 7. Keeping you informed

We do not sell, rent, or otherwise provide personally identifiable information to third-parties without your consent, except only as set out in section 4 above.

From time to time we, Freedom Vehicle Contracts Limited, and/or commercial partners (if you have agreed to receive their information when you provided your personal information) would like to contact you to tell you more about the offers, services, products and other initiatives available to you.

We, Freedom Vehicle Contracts Limited, and/or our commercial partners will only contact you if you have consented to this. However, if you are an existing customer (and have opted to receive communications) we may contact you about services, products and initiatives similar to those you

have previously received or enquired about (unless you have chosen not to receive such communications).

If, at any time after registering, you would like to change your preference and opt-in or opt-out from receiving communications from us or third-parties please contact us using the details in the 'contact us' section below. Please note that it can take up a little while for all marketing to stop once you either withdraw your consent or tell us you'd like to opt out of marketing. This is because some marketing may already be in transit.

If you opt out via one of our enquiry sources we won't automatically remove you from other sources you have enquired with unless you specifically tell us to do so. If you make more than one enquiry with Freedom Vehicle Contracts we may still reach out to you.

## **8. Links to third party websites & services**

We don't use third-party advertising companies to serve ads when you visit our web site.

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

## **9. Storing and retaining your personal data**

We are committed to protecting the security of your personal data, which is held in secure data centres in accordance with current legislative requirements, industry standards and technology. We will keep the personal data you have provided for as long as we have a relationship with you. Once that relationship has ended, we will retain it in accordance with this Policy only for as long as we reasonably require, and it will then be deleted and destroyed.

Some of the organisations to which we may disclose your personal information (including, but not limited to, our technical partners used in delivery of the Online Facilities) may be situated in countries which may not have laws that protect privacy rights in the same manner as in the United Kingdom. We will however take reasonable steps to ensure that your information is still properly protected.

We keep a copy of your credit file for 30 days when we apply for finance on your behalf. Other processors that we share your application with may keep the credit report for longer to comply with other legislation.

We will never retain your personal information for longer than is necessary. In most cases, our retention period will come to an end 3 years after the end of your relationship with us if you do not conduct any transactions. However, in some instances we are required to hold your personal information for up to 12 years following the end of your relationship with us (e.g. conducted a credit check, data relating to finance products or contractual purposes).

## **10. Security**

We take protecting your personal information seriously and are continuously developing our security systems and processes. Once received we store your personal data as set out in this Policy and our Data protection policy (available upon request). We are committed to ensuring that your information is secure. To prevent unauthorised access or disclosure we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

### **We protect your information in the following ways:**

- We only request information which is fit for our purposes.

- We endeavour to keep any information we hold about you up to date and accurate.
- We will remove from record any information which we hold about you which is no longer relevant.
- We will protect your data against unauthorised use.
- We follow strict security procedures in the storage and disclosure of information that you have given to us to prevent unauthorised access.

## 11. Your rights

- You have a number of rights under data protection legislation which, in certain circumstances, you may be able to exercise in relation to the personal information we process about you.
- All requests set out in this section or other queries relating to this Policy should be addressed to the Compliance department at the postal address at the bottom of this policy or by emailing [enquiries@freedomcontracts.com](mailto:enquiries@freedomcontracts.com). Please note that we will need to verify your identity before we can fulfil any of your rights under data protection law. This helps us to protect the personal information belonging to our customer against fraudulent requests.
- **Access Your Personal Information** - You have the right to see a copy of the information that we hold about you or your company upon written request. We may charge a small fee towards the cost of administering any request you make which is manifestly unfounded, excessive or repetitive otherwise no fee is charged for this service.
- **Update and Amend Your Personal Information** - You have the right to ask that the information we hold about you is corrected by updating/changing your profile preferences or by contacting us as above. We encourage you to update your personal information promptly if it changes.
- If you believe that any information, we are holding on you is incorrect or incomplete, please write to or email us as soon as possible on the address at the bottom of this policy. We will promptly correct any information found to be incorrect.
- **Restrict Processing** - You have the right to opt out of being contacted and ask that we, Freedom Vehicle Contracts Limited and its subsidiaries stop contacting you by clicking the relevant boxes on the screen upon which you provide information or by contacting us. You also have the right to request that your application be taken no further at any stage of your enquiry. You may choose to restrict the collection or use of your personal information in the following ways:
  - Whenever you are asked to fill in a form on the website, look for the box that you can click to indicate that you do not want the information to be used by anybody for direct marketing purposes. If you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by using the information found in the 'contact us' section below. We will not sell, distribute or lease your personal information to third parties unless we have your permission or are required by law.
  - **Close Your Account/Delete Your Personal Information** - You have the right to request that we close your account and/or delete your personal information from our database. We will make all reasonable efforts to comply with this request. However, it may not be possible to delete an entry without some delay and without retaining some residual personal information necessary for our legitimate interests, such as backups and records of deletions (including to ensure we no-longer communicate with you) or because we are required or permitted to retain personal information for other lawful requirements.
  - **Obtain and reuse your data** - You have the right to data portability. You can obtain and reuse your personal data for your own purpose across different services. You

can move, copy or transfer data you have provided to us, to another provider and we will transfer this in a safe and secure way.

- **Object to the use of your personal data** – You have the right to object to the processing of your personal data in certain circumstances, you have the right to stop your data being used for direct marketing and for the processing of a product or service if you no longer require or have use for it. There are some cases we may be able to continue processing but will only do so if we have a compelling reason for doing so. More information on restricting the processing activities can be found in section 5 above.
- **Automated Decision making and profiling**
- We may use your personal data in profiling in order to identify your suitability for products and services we offer and to inform you of these. Where an individual's financial history suggests they are unlikely to be accepted for a particular product or service, we may use that data to opt them out of receiving information about that product or service. This is in individuals interests as it helps stop them receiving irrelevant marketing or being targeted with marketing about products they cannot afford. These types of profiling may only be used in relation to our own products and services and as such are generally not considered to have a significant effect on your rights and interests.
- Where we rely on consent as the legal basis on which we process your personal information, you may also withdraw that consent at any time.
- If you are dissatisfied with our response to any of your data privacy concerns you have the right to raise this with the **Information Commissioner Office at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF (<https://ico.org.uk>)**.

## 12. Use of cookies

- We use Google AdWords, Instagram, Facebook Inc, Microsoft, and Twitter remarketing tracking cookies and website server tracking. We use the relevant information via remarketing that will display related ads across each user's networks and third-party personal reach networks to tailor adverts to you based on how you interact with our website and which of our website services you have used or viewed.
- Both the cookie and website tracking are used to say: "This person visited this page, so show them ads relating to that page." These platforms and their networks allow us to tailor our marketing to better suit your browsing needs and only display ads that are relevant to you.
- These networks are all third party. If you do not wish to receive the tailored advertising, you may choose to opt out. To do this please follow the below for each.
- **Google Adwords and Display**
- Open the Google settings app on your device (called Google Settings or Settings, depending on your device) > Scroll down and tap Google > Tap Ads > Switch to "opt out of interest-based ads" or "opt out of ads personalisation".
- **Facebook**
- Open Facebook settings on your device > Select Ads > then select the relevant ads specific to you, over to "off/not allowed".
- We have the right to update our policies at any time based on third party requirements and updates, pertaining to enhance your experience and ensure that it is relevant to you.
- **Other Networks**
- For all other sites, open your web browser. Select your device tools and delete the browser history, and where possible the cookie setting browser history.
- Due to Brexit law changes the website server tracking begins working from the moment you open our website in addition to accepting cookie tracking. To turn the website tracking off you must delete your browser history. This will allow you to opt out of Freedom related web advertisements.

### **13. Contact us**

- If you would like to exercise one of your rights as set out in the “Your rights” or “Automated decision making and profiling” sections above, or you have a question or a complaint about this policy, or the way your personal information is processed, please contact us by one of the following means:
- By Post: Data Protection officer, Freedom Vehicle Contracts Limited, Freedom House, 3 Pendeford Mill Lane, Codsall, Wolverhampton, WV8 1JB
- By Email: [enquiries@freedomcontracts.com](mailto:enquiries@freedomcontracts.com)
- By visiting: <https://freedomcontracts.com/contact-us/>
- Please include your name, address, and/or email address when you contact us.