

Vehicle Consulting UK Limited

General Data Protection Regulations

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Vehicle Consulting UK Limited handles data supplied by its customers for the application of finance. We are registered with the Information Commissioner's Office under registration reference Z2256037 and the register is available at www.ico.org.uk.

This document outlines Vehicle Consulting UK Limited's policy.

For the purposes of handling your data Vehicle Consulting UK Limited is both a Data Controller and Data Processor.

- A controller determines the purposes and means of processing personal data.
- A processor is responsible for processing personal data on behalf of a controller.

This is a living document and we are working to expand it in key areas.

What information does the GDPR apply to?

The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified in particular reference to an identifier.

This definition provides a wide range of personal identifiers to constitute personal data, including name, identification number, location data or online identifier.

The GDPR applies to both automated personal data and to manual filing systems where personal data are accessible according to specific criteria. This could include chronologically ordered sets of manual records containing personal data.

Our commitment to you under GDPR?

Your data will be processed lawfully, fairly and in a transparent manner in relation to individuals, including directors, partners and proprietors.

Your data will only be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.

We will only collect data which is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

We will ensure the data will be accurate (to the best of our capability) and, where necessary, kept up to date. Every reasonable step will be taken to ensure that personal data inaccuracies are erased or rectified without delay.

Your data will be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes.

Your data will be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

Your data will only be retained for as long as necessary.

We will be able to demonstrate compliance with these principles.

Consent

Vehicle Consulting UK Limited requires consent from customer(s) to use your data for the purposes which have been agreed.

Enquiries

Enquiries received by (including but not limited to) telephone/referral/electronically will be placed on our electronic Sales Management System. We will require the following information for the purposes of providing quotations:-

- Name and Address
- Email Address
- Telephone Number – Mobile or Landline

The information will only be used for the purposes of providing quotations, as requested. The information will not be passed to any 3rd party provider, and no credit search will be undertaken.

Marketing

From 01 April 2018, Vehicle Consulting UK Limited will only send marketing material electronically for personal customers who have opted in to receive such marketing material.

A private individual will be able to opt in to receive any of the following:-

- Price led special offers
- Monthly newsletter

Finance Application

As a Data Processor, once and only when you have completed an application for finance, we will carefully process your data with a carefully selected panel of funders. These funders include but not limited to Lex Autolease, ALD Automotive, Hitachi Capital, Leaseplan and Arval. The application for finance will only be processed with one finance provider. If there is a requirement to move to a different funder, we will receive permission from the customer.

How we use your Data

It is important that you understand how our different funding partners use 'Your Information' in connection with your application. 'Your Information' means the information you have given us, which we pass on to them, or which they receive from their enquiries and searches as credit reference and fraud prevention agencies. This applies to all applicants, including joint applications and members of the household, and directors or partners if the application is made by a limited company, partnership or unincorporated association.

They'll check your details with credit reference and fraud prevention agencies, and these agencies will record the check. They will provide the agencies with your current and previous names, addresses and dates of birth of all parties as well as the income and expenditure details that you have provided; so if you are providing information about others, on a joint application, you must be sure that you have their agreement. The agencies will provide them with confirmation of the income and expenditure details provided and public information about you and any third party financially linked to you: information such as county court judgements (CCJs) and bankruptcies, electoral register and fraud prevention on you and your known financial associates, current and previous names, addresses and dates of birth. If false or inaccurate information is provided and fraud is identified, details will be passed to fraud prevention agencies. Law enforcement agencies may access and use this information.

Credit Check

The agency searches that they make will leave a search footprint, both in their records and on your credit file at the agencies they've used, whether or not the application proceeds. If the search was for a credit application, the record of that search (but not their name) may be seen by other organisations when you apply for credit in the future. If you have made a joint application, they will link together the records of joint applicants, called financial associates. They will also link all your previous and subsequent names and addresses. Links between financial associates will remain on your and their files until such time as you or your associate successfully files for a disassociation with the credit reference agencies. It may be necessary to make more than one such search particularly if you provide new or changed information. If your finance application proceeds in excess of 90 days after the initial application, then it will be necessary for an additional credit reference agency search to be undertaken.

Information provided may be supplied to other organisations and used by agencies and them to assess you and your household for: credit and credit related services, affordability of credit; motor, household, credit, life and other insurance proposals and claims; debt tracing and recovery; checking details of job applicants and employees, prevention of fraud and money laundering; managing your accounts; statistical analysis about credit, insurance and fraud; market research, and to verify your identity if you or your financial associate applies for other facilities, including all types of insurance applications and claims. They and other organisations may access and use the information recorded by fraud prevention

agencies from other countries. Information about you may also be used for other purposes for which you have given consent, or, in very limited circumstances, when required by law or where permitted under the terms of the Data Protection Act 1998. Credit scoring and profiling techniques will be used to assess your application.

Credit reference agencies used include Experian, Equifax and others from time to time.

Electronic Signature(s)

There are now a number of our funding partners operating legal contracts and direct debits electronically. Where applicable, in order to proceed with your application and any future agreements, they will need your consent to conclude agreements through electronic means only using the email address you have supplied and/or electronic signatures. The email address provided has to be that of an individual and cannot include prefixes such as info@, office@ and sales@.

A copy of our personal finance proposal is available at www.vehicleconsulting.com/docs/PersonalProposal.pdf and the following is a summary of the information we will require for the finance application of a private individual to be processed:

Title	5 year address history including Postcode
Surname	Number of Dependants
Christian Name (s)	Residential Status
Date of Birth	Marital Status
Mobile Number	Landline Number
Personal Email Address	
5 year employment history	Employers Name
Occupation	Nature of Business
Work Telephone Number(s)	Address(es) including Postcode
Length of Time with Employer	
Income Details	Gross Income
Net Salary	Other Income
Pension Income	Partners Income
Car Allowance where applicable	
Expenditure Details	Mortgage/Rent
Gas/Water/Electricity/Phone/Mobile	Credit Cards
Loans	Transport including Petrol
Food/Drink/Clothing	
Is this request to replace a current financial commitment?	
Bank Details	Bank Sort Code
Bank Account Number	Bank Account Name
Bank Name and Address	Date Bank Account Opened

There will be a number of corporate bodies whose company information falls outside of the GDPR guidelines. Vehicle Consulting are committed to ensure the information provided is processed with integrity. We are required to process directors' information in line with GDPR guidelines. If you are providing details of others, including multiple director information, you must ensure that you have their agreement. In addition to the company information, we will require the following personal details of at least two directors (possibly more).

Information for Charities, Friendly Societies, Co-operatives and other bodies would require the following information for at least two trustees (possibly more).

Sole Traders and Partnerships require the following information in addition to the business information. All partner details will be required.

Title	Surname
Christian Name	Date of Birth
5 Years Address History	Marital Status
Residential Status	Length of Time in Residence
Nationality	Number of Dependants

A copy of our business finance proposal is available at www.vehicleconsulting.com/docs/BusinessProposal.pdf.

Contract

During a live contract we will only process your data for the performance of the contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.

We will make contact with you during the contract of an agreement, to discuss your mileage, service obligations and any such vehicle recalls which have occurred.

If we haven't got a contract (as yet), but you have asked us to do something (specific) as a first step (like provide a quote) and we need to process your data to do what is being asked of ourselves, the processing of this data will be necessary and we will not ask for data which isn't required at this stage.

Legal Obligation

Vehicle Consulting UK Ltd will process personal data in line with our legal obligation laid down by UK or EU law. This does not mean that there must be a legal obligation specifically requiring the specific processing activity.

For example:- As a financial institution who relies on the legal obligation imposed by Part 7 of the Proceeds of Crime Act 2002 to process personal data in order to submit a Suspicious Activity Report to the National Crime Agency when it knows or suspects that a person is engaged in, or attempting, money laundering.

In a large number of cases we will only process your data with consent. The GDPR sets a high standard for consent, and we will receive electronic permission via the customer. If written/electronic permission is unavailable we will read the following 'Use of your Data' to you and seek verbal permission.

It is important that you understand how our different funding partners use 'Your Information' in connection with your application. 'Your Information' means the information you have given us, which we pass on to them, or which they receive from their enquiries and searches as credit reference and fraud prevention agencies. This applies to all applicants, including joint applications and members of the household, and directors or partners if the application is made by a limited company, partnership or unincorporated association.

They'll check your details with credit reference and fraud prevention agencies, and these agencies will record the check. They will provide the agencies with your current and previous names, addresses and dates of birth of all parties as well as the income and expenditure details that you have provided, so if you are providing information about others, on a joint application, you must be sure that you have their agreement. The agencies will provide them with confirmation of the income and expenditure details provided and public information about you and any third party financially linked to you: information such as county court judgements (CCJs) and bankruptcies, electoral register and fraud prevention on you and your known financial associates, current and previous names, addresses and dates of birth. If false or inaccurate information is provided and fraud is identified, details will be passed to fraud prevention agencies. Law enforcement agencies may access and use this information.

Other Lawful basis for processing

There are a number of other lawful reasons for processing your data, other than consent. It is unlikely Vehicle Consulting will use any of the following basis for processing of data; however, should we feel it is required, we will do so.

- **Vital Interest** – We are only able to rely on vital interests as our lawful basis if we need to process personal data to save someone's life.
- **Public Task** – To process your data to perform a specific task in the public interest that is set out in law.
- **Legitimate Interest** – We would be processing your data in ways that the customer would expect, and have minimal privacy impact.
- **Criminal Offence Data** – For the purposes of processing data for finance applications we do not currently require any criminal conviction history and won't be processing it.

Retention Periods

Vehicle Consulting UK Limited will only retain and use personal information collected on your behalf for a period of time deemed appropriate. In general terms, if you have requested to/entered into a contract to supply goods or services we will retain the information for a period of 6 years.

‘Enquiry’ is a request for us to enter into the supply of goods or services. At this stage it isn’t a contract, simply an opportunity to do business. We will keep your name, address and telephone number up to 6 years after your initial enquiry.

‘Finance Application’ is after an acceptance of our quotation has been made by the customer and a full and detailed finance application is to be made. (Please follow this link to view a finance proposal form www.vehicleconsulting.com/docs/PersonalProposal.pdf). If the application is accepted by one of our carefully selected panel of funders, and you enter into a contract to supply goods or services, we will keep this application for 6 years. If the application is accepted, and you choose not to proceed with the supply of goods or services, we will keep your application for up to 1 year. If the application is declined by one of our carefully selected panel of funders, we will keep the information for 90 days.

During the course of our normal business operations, we may be asked to collect additional information. In this document we have listed information items which we may ask for (but not exclusively) and the retention period we will keep the information for:

Additional Information Requested	Retention Period
Proof of Residential address dated within the last 90 days	<ul style="list-style-type: none">- On executed contracts this will be kept for 6 years- On contracts which do not proceed this will be kept for 90 days
Personal Bank Statements	<ul style="list-style-type: none">- On executed contracts this will be kept for 6 years- On contracts which do not proceed this will be kept for 90 days
Last set of certified accounts (For Sole Traders & Small Partnerships)	<ul style="list-style-type: none">- On executed contracts this will be kept for 6 years- On contracts which do not proceed this will be kept for 90 days
Copy Driving Licence	<ul style="list-style-type: none">- On executed contracts this will be kept for 6 years- On contracts which do not proceed this will be kept for 90 days
Proof of Signature i.e. Passport	<ul style="list-style-type: none">- On executed contracts this will be kept for 6 years
Unique Electricity Supply Number	<ul style="list-style-type: none">- On executed contracts this will be kept for 6 years

Individual Rights

The GDPR provides the following rights from us, for the individuals whose data we are processing:

1. The right to be informed
2. The right of access
3. The right of rectification
4. The right of Erasure
5. The right to restrict processing
6. The right to data portability
7. The right to object
8. The right of refusal in relation to automated decision making and profiling.

Your right to be informed

Individuals have the right to be informed about how we collect and use their personal data.

This document provides individuals with the information about the data we collect and use on their behalf. We provide information including our purposes for processing your personal data, our retention periods for that personal data, and who it will be shared with. If there are any elements where you require additional clarification please place this in writing to:

Data Protection Officer
Vehicle Consulting UK Limited
2 Acorn Business Park
Heaton Lane
Stockport
SK4 1AS

Your right of access

Individuals have the right to access their personal data and supplementary information. The right of access allows individuals to question and verify the lawfulness of the processing.

You have the right to obtain the following information

- Confirmation that their data is being processed;
- Access to your personal data; and

- Other supplementary information

Vehicle Consulting UK Limited will not charge a fee for all reasonable right of access requests. However, we do reserve the right to charge a 'reasonable fee' when a request is manifestly unfounded or excessive, particularly if it is repetitive. In addition, we may charge a reasonable fee with requests for further copies of the same information. The reasonable fee charged will be based on the administrative cost of providing the information.

Please note that Vehicle Consulting UK Ltd can only receive requests from the named client, and reasonable steps will be undertaken to ensure the authenticity of such requests.

Your right of rectification

Vehicle Consulting UK Limited endeavour to create accurate data information records of all clients. If you feel information held by us is inaccurate or incomplete (this may require providing supplementary information) then please notify us immediately.

You may make the request for rectification verbally or in writing, and we will correct the information within 28 days. If the data held is inaccurate and is used to make significant decisions we will make the changes within 3 hours.

Your right of Erasure

Individuals have the right to have personal data erased, also known as the 'right to be forgotten'. Your right of erasure is not absolute and only applies in the following circumstances.

- The personal data is no longer necessary for the purposes in which we collected
- If we are relying on consent as the lawful basis for holding the data, and you withdraw your consent
- If we are processing your personal data for the purposes of direct marketing and you object to the processing of your data
- If we, unknowingly, have processed your data unlawfully
- If we , have to comply with a legal obligation

If we have disclosed information to others, or it is in the public interest, we will tell other organisations about your request to erase personal data.

Your right of erasure does not apply for the following reasons:

- To exercise the right of freedom of expression and information
- To comply with a legal obligation
- For archiving purposes in the public interest
- For the establishment, exercise or defence of legal claims

We reserve the right to refuse a request for erasure if it is manifestly unfounded or excessive, taking into account whether the request is repetitive in nature.

Your right to restrict processing

Individuals have the right to request the restriction or suppression of their personal data. Please note this is not an absolute right and only applies in certain circumstances. You have the right to respond verbally or in writing, and we will respond within one calendar month.

You have the right to restrict the processing of personal data where you have a particular reason. You may have an issue with the content of the information we hold or how we are processing it. In most cases, we will not be required to restrict an individual's personal data indefinitely, but will have the restriction in place for a certain period of time.

Your right to data portability

Individuals have the right to data portability which allows you to obtain and reuse their personal data for their own purposes across different services.

Your right to object

Individuals have the right to object to the processing of your personal data for direct marketing initiatives (including profiling). Once we have received verbal or written confirmation of your wish to stop your personal details being used for direct marketing, we will do so within 72 hours.

Vehicle Consulting UK Limited will only use your personal data for marketing initiatives where you have expressly opted in.

Your right of refusal in relation to automated decision making and profiling

Individuals have the right to refuse a finance company the opportunity to make their finance decision based on automated decision making and profiling. As a Data Controller and Data Processor, Vehicle Consulting UK Ltd do not operate any automated decision making or profiling systems. However, our finance partners all operate an automated decision making and profiling system, and this information will be passed securely to our key partners.

Information provided may be supplied to other organisations and used by agencies and them to assess you and your household for: credit and credit related services, affordability of credit; motor, household, credit, life and other insurance proposals and claims; debt tracing and recovery; checking details of job applicants and employees, prevention of fraud and money laundering; managing your accounts; statistical analysis about credit, insurance and fraud; market research, and to verify your identity if you or your financial associate applies for other facilities, including all types of insurance applications and claims. They and other organisations may access and use the information recorded by fraud prevention agencies from other countries. Information about you may also be used for other purposes for which you have given consent, or, in very limited circumstances, when required by law or where permitted under the terms of the Data Protection Act 1998. Credit scoring and profiling techniques will be used to assess your application.

International Transfer

Vehicle Consulting UK Ltd will not transfer any personal data outside the European Union to third countries or international organisations.