

New Data Protection Regulation

We want to let you know about the General Data Protection Regulation (known as GDPR) that comes into effect on the 25 May 2018.

What does it mean to you?

We'd like to make you aware of the following changes to your Data Protection Statement.

The types of personal data we collect and use

Whether or not you are a current customer, we'll use the personal data for reasons set out below and if you are a current customer we will continue to use it to manage the account.

We'll collect most of this directly during the application process. There will also be sources of personal data collected indirectly during the process. Personal Data we use may be about you as a personal or business customer and may include:

- Full name and personal details including contact information (e.g. home and business address and address history, email address, home, business and mobile phone numbers);
- Date of birth and/or age (e.g. to make sure you are eligible to apply for a customer account)
- Financial details to ascertain credit worthiness and prevent fraud?
- Information from credit reference agencies and other publicly available sources for credit and fraud prevention purposes.
- Information from your insurer or insurance broker to confirm that you are fully insured to cover the machinery on hire.

Automated Decision Making

We've described new ways of processing your personal data relating to automated decision making. This includes profiling for marketing and to tailor marketing communications. This doesn't mean we will start to send you direct marketing if you've told us you don't want to hear from us as we'll only contact you according to your preferences. We will without human intervention evaluate your personal situation such as personal preferences, interests, past transactions and triggers and events such as account opening anniversaries or seasonality business promotions. We may do this to decide what marketing communications are suitable to you and to analyse statistics. All this activity is on the basis of our legitimate interests and to develop and improve our products and services.

Providing your personal data

We will advise you if some personal data is optional, including if we ask for your consent to process it. In all other cases you must provide your personal data to allow us to open and process your account with us. (Unless you are already a customer and we already hold your details)

Monitoring of communications

Subject to applicable laws, we'll monitor and record your calls, emails, text messages, social media messages and other communications relating to our dealings with you. We'll do this for regulatory compliance, self – regulatory practices, crime prevention and detection, to protect the security of

our communications systems and procedures, to check for obscene or profane content, for quality control and staff training, and when we need to see a record of what's been said.

Using your personal data: the legal basis and purposes

We'll process your personal data:

1. As necessary to hold an account with us
 - a. To take steps at my request prior to entering into it;
 - b. To decide whether to enter into it;
 - c. To manage and perform the account;
 - d. To update our records; and
 - e. To trace your whereabouts to contact you about your account and/or recovering debt.
2. As necessary for our own legitimate interests
 - a. For good governance, accounting and managing and auditing your business operations;
 - b. To search credit reference agencies to apply for a credit limit for your account with us
 - c. To monitor emails, calls, other communications, and activities on your account
 - d. For market research, analysis and developing statistics; and
 - e. To send you marketing communications, including automated decision making relating to this.
3. As necessary to comply with legal obligation
 - a. When we exercise our rights under data protection law and make requests;
 - b. For compliance with legal and regulatory requirements and related disclosures;
 - c. For establishment and defence of legal rights
 - d. For activities relating to the prevention, detection and investigation of crime;
 - e. To verify your identity, make credit, fraud prevention and anti-money laundering checks; and
 - f. To monitor calls, emails, other communications and activity on your account.
4. Based on your consent, e.g
 - a. To send you marketing communications where you've asked for my consent to do so.

Sharing of your personal data

Subject to applicable data protection law we may share your personal data with:

- The ASHBROOK group of companies in which we have employees, officers, agents or professional advisors of these companies;
- Sub contractors and other persons who help us provide you with the product or service;
- Our legal and other professional advisors, including auditors;
- Credit reference agencies and debt collection agencies periodically or service management;
- Government bodies and agencies in the UK (e.g HMRC)
- Market research organisations who help to improve our products and services
- Payment systems which are necessary to operate your account and for regulatory purposes, to process transactions, and for statistical purposes
- External sources of publicly available information such as Companies House and credit reference agencies.
- Anyone else where we have your consent or as required by law.

Data anonymisation and aggregation

Your personal data may be converted into statistical or aggregated data which can't be used to identify you but then used to produce statistical research and reports.

Credit Reference Checks

If you apply to open an account with us or part of an annual review of your account, we'll perform a credit and identity check on the registered address with one or more credit reference agencies. To do this we'll supply your personal data to the credit reference agencies and they'll give us information about you.

Marketing Preference and related searches

We may use your address, phone numbers or email address to contact you according to your preference. You can change your preference at any time by contacting us.

Criteria used to determine retention periods (whether or not became a customer)

The following criteria are used to determine data retention periods for your personal data:

- Retention in case of queries
We'll retain your personal data as long as necessary to deal with your enquiries
- Retention in case of claims
We'll retain your personal data for as long as you might legally bring claims against us
- Retention in accordance with legal and regulatory requirements
We'll retain your personal data after your account, service has ended or has otherwise come to an end based on our legal and regulatory requirements.

Your rights under applicable data protection law

Your rights are as follows (noting that these rights don't apply in all circumstances and that data portability is only relevant from May 2018)

- The right to be informed about the processing of your personal data;
- The right to have your personal data corrected if its inaccurate;
- The right to object to processing of your personal data;
- The right to restrict processing of your personal data;
- The right to have your personal data erased
- The right to request access to your personal data and information about how we process it;
- Rights in relation to automated decision making including profiling.

You have the right to complain to the information commissioner's office. It has enforcement powers and can investigate compliance with data protection law.