



PRIVACY NOTICE

Who we are

Leasing Programmes Limited (LPL), Buckland House, Unit Z9, Westpark, Wellington, Somerset TA21 9AD complies with General Data Protection Regulation (GDPR) May 2018 in its activities where personal information is collected. To this end, the Information Controller is Leasing Programmes Limited and Compliance Manager is Linda Wyeth.

All personal information is treated as private and confidential. We have the appropriate procedures in place to protect this information and nothing will be disclosed to anyone other than in exceptional circumstances, as permitted by law or set out below.

Our Privacy Notice refers to the basis on which any personal information is collected from you or provided by you and how we will process it. Please read this notice carefully to ensure that you understand what we collect, why, how it is stored and how we will treat it.

In addition to Leasing Programmes Limited, this notice also applies to Blackdown Asset Finance and Linklease, both based at the above address.

Changes to the Privacy Notice

LPL reserves the right to change this notice at any time. Any changes made to this notice in the future will be posted on this page and not by individual written circumstances. We advise that you check this notice regularly. By continuing to access or use our site, you are agreeing to any such changes.

Why we need to collect, use and process personal information

Under GDPR there are 6 lawful bases for collecting personal information. LPL collects personal information under the basis of *consent*.

Consent: we do not collect anything until you have given clear consent on our Data Protection Certificate of Authority or our Know Your Customer form.

We collect personal information from you in order to perform our contractual obligations when you apply for any of our products or services.

When you complete an application for any of our products or services you understand that we will be processing your personal data for the purpose set out above.

When we need to collect, use and process sensitive personal information we will obtain your express consent at the specific time that we need it.

What information that we may collect, hold and process about you

- Title
- Full name
- Permanent residential address & previous address (if you have lived there less than three years)
- Telephone contact number(s)
- Mobile number
- Email address
- Date of birth
- Whether you are married or in a registered civil partnership
- Financial information about you, ie bank account details etc
- Driving licence

How we collect and use personal information

If you are an existing customer, we will contact you by electronic means (email or SMS) and telephone you with information about goods and services similar to those which were the subject of a transaction or negotiations to you.

If you are a new customer, and where we permit selected third parties to use our information, we (or they) will contact you by electronic means only if you have consented to this. If you do not want us to use your information in this way, or to pass your details on to third parties for marketing purposes, please tick the relevant box situated on the Agreement in which we collect your information. You can also exercise the right at any time by contacting our offices.

Use of personal information

In considering your application, we or our funders to whom we may assign our Agreements may search your credit record at credit reference agencies ('your records'). We or our funders may also search linked records of your spouse or partner. In this Agreement, we seek authority from you for us and our assignees to undertake and appoint credit reference agencies to undertake such searches. Such searches at credit references agencies may include searches against those to whom you may be linked, which may include your spouse/partner, your fellow directors (where you are a company), or others with whom you are linked financially. For the purposes of this Agreement/application, you agree that you may be treated as financially linked to such individuals and in such circumstances, you will be assessed by reference to all such 'associated records'.

Where you are a company, you will inform each director of the company of this notice. The credit reference agency will add to your records details of our search and your application and this will be seen by other organisations that make searches. We will use credit scoring or other automated decision-making systems when assessing your application. We may also undertake further searches against you and any associations for the purpose of tracing and recovering debt.

We will also add to your records details of your Agreement with us, the payments you make under it, any default or failure to keep to its terms, and any change of address you fail to tell us about where a payment is overdue. It is important that you give us accurate information. We will check your details with fraud prevention agencies, and if you give us false or inaccurate information and we suspect fraud, we will record this. We, the credit reference agencies and the fraud prevention agencies will also use your records for statistical analysis about credit, insurance and fraud.

We may undertake searches with Experian, Equifax, CreditSafe or CallCredit for the purposes of verifying your identity and for anti-money laundering purposes. To do so, these companies may check the details you supply against any particulars on any information base (public or otherwise) to which they have access. They may also use our details in the future to assist other companies for verification purposes. A record of the search will be retained. If you are a joint applicant, such as a partnership, unincorporated association or if you are a body corporate, such as a limited company or LLP or charity, you confirm to us that you have obtained the relevant consent to authorise us to create an identity search against any partner/trustee/officer/director/shareholder (as so required) at the credit reference agencies.

We may share or store your information with our funders and any person to whom we intend to assign our rights under this Agreement, and they may use your information or make further searches as they may require, in the same manner as set out above. Fraud prevention agency records will also be shared with other organisations to help make decisions on motor, household, credit, life and

other insurance proposals and insurance claims, for you and members of your household. They may also use information about you to carry out market research.

Information about all applicants will be collected and held on LPL's systems and information base and will be used to process your application and for ongoing account maintenance and administrative purpose. It will be held in accordance with GDPR and we will only disclose it to other companies within our group, our lawyers, auditors, external advisors, agents and third parties as well as anyone to whom we transfer our right and duties under your Agreement with us, together with their lawyers, auditors and external advisors, agents and rating agencies.

We will also disclose your personal information to third party service providers who we engage from time to time but we will always endeavour to ensure that they hold it in accordance with GDPR.

Information we receive from other sources

We will combine this information with information you give to us and information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

We use information held about you in the following ways:

- To provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes.
- To provide the best possible service we will need to contact you shortly before the maturity of any fixed term or fixed rate products. This ensures you are aware of the options available and helps you make an informed decision about your maturity instructions.
- To notify you about changes to our service and to carry out our obligations arising from any contracts entered into between you and us.

3

We may also use your information, or permit selected third parties to use your information, to provide you with information about goods or services which may be of interest to you and we or they may contact you about these by post or telephone.

Disclosure of your information

You agree that we may:

- Disclose information to third parties, including suppliers, funders, insurers, agents and carefully selected organisations so that they can use it to market their products and services.
- Disclose information to credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you
- Disclose information where required or permitted to do so by law, or to government entities or regulatory bodies in order that they may discharge their responsibilities and obligations or to exercise their powers or functions
- Disclose information if LPL or substantially all of its assets are acquired by a third party, in which case personal information held by it about its customers will be one of the transferred assets.
- Disclose information if we are under a duty to disclose or share your personal information in order to comply with any legal obligation, or in order to enforce or apply our website terms & conditions, or the terms and conditions of any Agreement we have with you; or to protect the rights, property, or safety of LPL, our customers or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

<https://www.leasingprogrammes.co.uk/privacy-notice/>

- Market our products and services or those of our group or selected third parties.
- Transfer information to any country, including a destination outside the European Economic Area (EEA). It may also be processed by staff operating outside the EEA who work for us or a third party. Such staff may be engaged in, among other things, the processing of your payment details and the provision of support services. We will take all steps reasonably necessary to ensure that your information is treated securely and in accordance with this privacy policy. If no satisfactory information protection laws exist in the country to which we are transferring your personal information, we will put in place equivalent contractual safeguards to those contained within GDPR.

We engage a third party to host and manage our site and as such they will require access to your personal information. We will use all reasonable endeavours to ensure that they treat your information in accordance with GDPR.

Information Retention

Personal information supporting an unsuccessful financial application will be deleted within 1 month of the rejection.

Personal information held to support a successful financial application will be held on paper and electronically for 6 months after the termination of the Agreement. It will then be deleted.

An Information Register is maintained by LPL which records the history of the information, ie a full record of consent details and the final deletion date of the information.

Security & Storage of Information

The personal information we collect from you is stored by us on secure servers, protected through a combination of physical and electronic access controls, firewall technology and other security measures. In addition, when we forward personal information to third parties, this will be encrypted using a secure technology.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Sadly the movement of information via the internet is never completely secure. We will do our best to protect your personal information, we cannot guarantee the security of your information transmitted to our site. This transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Cookie Policy

LPL uses cookies on its website but only to collect business information.

What is a cookie?

A cookie is an information packet sent by web servers to web browsers and stored by the web browsers.

Information is then sent back to the server each time the browser requests a page from the server. This enables a web server to identify and track web browsers.

There are two main kinds of cookies; session cookies and persistent cookies.

Session cookies are deleted from your computer when you close your browser.

Persistent cookies remain stored on your computer until deleted or until they reach their expiry date.

<https://www.leasingprogrammes.co.uk/privacy-notice/>

Google Cookies

LPL uses Google Analytics to analyse the use of this website. Google Analytics generates statistical and other information about website use by means of cookies which are stored on users' computers. The information relating to our website is used to create reports about the website usage. Google will store and use this information. Google's Privacy Policy is available at: www.google.com/privacypolicy.html

Other/Third Party Cookies

When you use this website, you may also be sent the following third party cookies, which may be used for the following purposes:

Facebook – tracks whole profile you are viewing and which website you have come from

Twitter – as above

Linkedin – as above

Most browsers allow you to refuse or accept cookies.

In Internet Explorer, you can refuse all cookies by clicking 'Tools/Internet Options/Privacy' and selecting 'Block all cookies' using the sliding selector.

In **Firefox**, you can adjust your cookies settings by clicking 'Tools/Options/Privacy'.

In **Chrome**, click Settings/Show Advanced Settings/Privacy/Content Settings – in the Cookies section, you can change to your preferred settings.

In **Safari**, click Preferences/Privacy and choose how you want Safari to treat cookies.

Your rights

You have the following rights:

- To be informed about how we obtain and use your information
- To ask for a copy of the information that we hold about you
- To have your information rectified
- To request us to restrict processing of your personal data
- To request to have your information erased (Right to be Forgotten)
- To object to the processing of your information (eg for direct marketing purposes)
- To have information you provided to us, returned to you or sent directly to another company, in a structured, commonly used and machine-readable format where technically feasible (Data Portability)
- Where the processing of your information is based on your consent, the right at any time to withdraw that consent
- To object to any decisions based on the automated processing of your personal data, including profiling
- To lodge a complaint with the Information Commissioner's Office (ICO), the supervisory authority responsible for data protection matters.

Access to information

The GDPR gives you the right to access information held about you. Your right of access can be exercised in accordance with this legislation. Any access request will be free and will be met within 7 days.

<https://www.leasingprogrammes.co.uk/privacy-notice/>

If you think any details LPL hold about you are incorrect (eg an out of date address) please write to us. Any information which is incomplete/incorrect/out of date shall be amended as soon as reasonably possible.

Call recording

Should you ring one of the phone numbers advertised on our website your calls may be recorded to help us improve our service, to assist us in training, to evidence communication between us and in the interests of security. We also record some of the outgoing calls that we make for the above reasons. You may voluntarily give personal information to enable you to request information from us or provide feedback.

APPENDICES

- 1 Data Protection Certificate of Authority**
- 2 Know Your Customer Form**
- 3 Guarantee Form**

Contact us

If you have any questions, comments or queries about the way we are collecting or using your personal information, please contact Linda Wyeth at the address at the foot of this notice or email wellington@leasingprogrammes.co.uk

<https://www.leasingprogrammes.co.uk/privacy-notice/>