

DATA PROTECTION– FAIR PROCESSING NOTICE

Elderbridge Limited is the "controller" of your personal data to the extent that such data is contained in the records of your loan account. A controller is the person who determines the purpose and manner in which your personal data is processed.

This privacy notice explains what information we hold and collect about you, how we'll use that information, who we'll share it with, the circumstances when we'll share it and what steps we'll take to make sure it stays private and secure.

It continues to apply even if your loan ends. It should also be read alongside the terms and conditions of your loan agreement, as these are likely to include sections relating to the use and disclosure of information.

Who we are

We are Elderbridge Limited, a company registered in England and Wales with company number 08896386. Our Customer Services team can be contacted on 0345 6506237. We are open 9am to 5.30pm Monday to Friday and 9am to 1pm on Saturday (excluding UK public holidays). You can write to us at Elderbridge Limited, PO BOX 908, Newport, NP20 9NX. Elderbridge Limited is authorised and regulated by the Financial Conduct Authority with reference number 719437. For more information please visit our website at www.elderbridge.co.uk.

The contact details for our data protection officer are as follows:

By post: For the attention of the Data Protection Officer, Elderbridge Limited, PO Box 908, Newport, NP20 9NX

By email: DPO@elderbridge.co.uk

What data we use

Personal data received by us about you includes your name, address, contact details, identification verification details, bank details and loan account information.

You may also provide us with information which is classified as 'special categories of personal data' such as information regarding your health. We will only record and use this information with your explicit consent. You can withdraw your consent at any time by contacting us.

Where we obtain your data from

We have obtained your personal data from the previous lender in relation to your loan account and may also receive personal data directly from you.

In administering your account, where it is deemed necessary to verify the accuracy of the data and/or for the purposes of collecting the outstanding balance we may access third party data sources and combine and process data from those sources with your personal data. Such third party data sources include the Land Registry, the Department for Work and pensions and other government departments, Credit Reference Agencies (**CRAs**), fraud prevention agencies, registers of court judgments, bankruptcies, postcode/address search databases and telephone number verification databases.

We may access and analyse personal data about you provided to us by third parties, or which is available from public sources including social media. This may include details of your current and future indebtedness to other creditors and/or your payments against those debts.

How your personal data will be used by us

We will store, access and use your personal data:

1. for the purpose of administering your loan account and collecting the sums outstanding from you;
2. to help investigate, prevent and detect fraud or financial crime. This will involve sharing your personal data with CRAs, government agencies and fraud prevention agencies for the performance of credit and identity checks;
3. for marketing purposes, as set out in Marketing below,
4. to carry out data analytics so that we can better understand your circumstances and preferences, and so that we can improve our products and services,
5. to retain a history of your account for future reference by you and/or us in case of any legal claim, as set out in Retention and Deletion below.

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Legal grounds for our use of your personal data

Our use of your personal data (as described above) is necessary for:

1. our performance of the loan agreement between us;
2. compliance with our legal and regulatory obligations;
3. our legitimate interests which include:
 - a. helping to prevent and detect fraud and financial crime;
 - b. marketing and advertising our products and services to you. You have the right to opt out of receiving such communications at any time;
 - c. the carrying out data analytics so that we can better understand your circumstances and preferences, and so that we can improve our products and services,
 - d. retaining a historical record of your loan account in case of any future legal claim.

Where you have provided us with information regarding your health, our lawful basis for processing the information about your health is your consent. You can withdraw your consent at any time by contacting us.

Our use of your personal data is subject to a framework of safeguards that help make sure your rights are protected. This includes ensuring you have the ability to exercise your rights in relation to your personal data and complain if you are dissatisfied (please see 'Your rights' below).

Retention and deletion

We will normally retain personal data for a period after the loan has been closed. The criteria that determine this period are:

1. our obligation to comply with regulatory or legal requirements,
2. our legitimate interests in complying with good practice in the industry,
3. our legitimate interests, for example to help us respond to queries or complaints, fighting fraud and financial crime, responding to requests from regulators, etc,
4. our legitimate interests in dealing with any disputes or concerns that may arise in the future.

Generally, we will normally retain personal data for the life of the account and for a period of 13 years after a secured loan account has been closed and 7 years after an unsecured loan account has been

closed. If we do not need to retain information for this period of time, we may destroy, delete or anonymise it more promptly.

We will generally delete accounts in batches periodically (for example, quarterly, six monthly, yearly) so, depending on when the batch is run, your personal data may be deleted earlier or later than set out above.

Marketing

We may use your information to provide you with information about our products and services, and also products and services from our partners and other relevant third parties that we believe you might be interested in.

We may need your consent to communicate by certain channels and we will always make sure we get this where we need to.

You have right to opt out of receiving such communications at any time (see 'Your rights' below).

Who we share your personal data with

We will give details of your personal account to Credit Reference Agencies. That information will include names and parties to your account and how you manage it/them, if you defer payments in the future, and if you borrow and do not repay in full and on time and are not eligible for deferment.

You should be aware that the existence of default information, particularly defaults which are not marked as "settled" or "satisfied", may adversely affect your ability to obtain credit in the future.

We also pass personal data on to the following third parties that provide services to us in connection with your loan account: loan administration service providers, debt collection agencies, solicitors, asset managers, tracing agents, print houses, payment service providers, telephony service providers and storage companies. These third parties are obliged to keep your details secure and use them only to fulfil instructions provided by us.

For the purposes set out above it may sometimes be necessary to process your personal data outside the European Economic Area (being the EU, Iceland, Liechtenstein and Norway). If this happens we will ensure the transfer is compliant with data protection legislation and appropriate safeguards are in place to protect your personal data. Where a destination country is not deemed to already have adequate safeguards in place to protect personal data, our standard practice is to use approved 'standard data protection clauses' for such transfers.

We may also pass your personal data to the beneficial owner of your loan. This is the entity who holds the beneficial rights, title and interest to your loan. As the beneficial owner, this entity is also the data controller of your personal data and may process it under data protection legislation. If this entity does process your personal data itself it will provide you with its own privacy notice in respect of that processing, which may be different to this notice. If you are unhappy about how the beneficial owner is handling your personal data please contact the beneficial owner directly using the contact details provided in their fair processing notice.

As set out in Marketing above, we may also share your information with our partners and other relevant third parties.

Keeping your information safe

We use a range of measures to keep your information safe and secure. We require our staff and any third parties who carry out any work for us to comply with/appropriate compliance standards

including obligations to protect information and applying appropriate measures for the use and transfer of information.

What we expect from you

We rely on you to make sure that the information you give us is accurate and up to date, and you must tell us if anything changes (such as your address) as soon as possible. If, in breach of the terms of your loan, you do not provide us with the personal data that we need to manage the loan, this may adversely affect your legal position.

If you provide information for another person in relation to your account, for example a joint account holder, a dependant or someone to act on your behalf, you'll need to tell them how to find this notice and make sure they agree to us using their information as described in it.

Your rights

You have a number of rights in relation to the information that we hold about you including:

- the right to access information we hold about you and to obtain information about how we process it.
- the right to withdraw your consent to us processing your information. However, may continue to process your information if we have another lawful reason for doing so.
- the right to receive certain information you've provided to us in an electronic format and/or request that we send it to a third party.
- the right to request that we rectify your information if it is inaccurate or incomplete.
- the right to ask us to delete your information. We may continue to keep your information if we are entitled or required to.
- the right to object to, and to request that we restrict, our processing of your information in some circumstances
- the right not to receive marketing communications.

If you wish to exercise any of the above rights please contact us at "Data Subject Rights Team" Elderbridge Limited, PO BOX 908, Newport, NP20 9NX or email marketing@elderbridge.co.uk.

Complaints

If you are unhappy about how we are handling your personal data please contact us (see 'Who we are' above for our contact details). You may also file a complaint with Target's DPO (see earlier), or with the Information Commissioner's Office, which regulates our processing of personal data. You can contact the ICO by:

Phone: 0303 123 1113

Post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow SK9 5AF.

Going to their website at www.ico.org.uk.

Credit Reference Agencies

As stated above, we may share your information with CRAs. If we do, CRAs will record the details that are supplied on your personal account including any previous and subsequent names that have been used by the account holders and how you/they manage it/them. If you borrow and do not repay in full or on time, the CRAs will record the outstanding debt. Records shared with CRAs remain on file for 6 years after they are closed, whether settled by you or defaulted.

The information which we and other organisations provide to the CRAs about you may be supplied by CRAs to other organisations and used by them to:

- (a) prevent crime fraud and money laundering by for example checking details provided on applications for credit and credit related or other facilities;
- (b) check the operation of credit and credit-related accounts;
- (c) verify your identity if you or your financial associate applies for other facilities;
- (d) make decisions on credit and credit related services about you, your partner, other members of your household or your business;
- (e) manage your personal, your partner's and/or business (if you have one) credit or credit related account or other facilities;
- (f) trace your whereabouts and recover debts that you owe; and/or
- (g) undertake statistical analysis and system testing.

Fraud prevention agencies

The information which we provide to fraud prevention agencies about you may be supplied by such fraud prevention agencies to other organisations, including law enforcement agencies, and used by them and us to prevent crime, fraud and money laundering by, for example:

- (a) checking details provided on applications for credit and credit related or other facilities;
- (b) managing credit and credit related accounts or facilities;
- (c) cross checking details provided on proposals and claims for all types of insurance;
- (d) checking details on applications for jobs or when checked as part of employment;
- (e) verifying your identity if you or your financial associate applies for other facilities including all types of insurance proposals and claims;
- (f) tracing your whereabouts and recovery of debts that you owe; and/or
- (g) conducting other checks to prevent or detect fraud.

We and other organisations may also access and use the information recorded by fraud prevention agencies from other countries.

How to find out more

The three main credit reference agencies have jointly published an information notice outlining how they each use and share personal data. This notice is available at www.experian.co.uk/crain/index.html, www.callcredit.co.uk/crain and www.equifax.co.uk/crain.