

## **General**

Before we provide services, goods or financing to you, we undertake checks for the purposes of preventing fraud and money laundering, and to verify your identity. These checks require us to process personal data about you.

The personal data you have provided, we have collected from you, or we have received from third parties will be used to prevent fraud and money laundering, and to verify your identity.

Details of the personal information that will be processed, for example: name, address, date of birth, address, contact details, financial information, employment details, device identifiers including IP address and vehicle details.

We and fraud prevention agencies may also enable law enforcement agencies to access and use your personal data to detect, investigate and prevent crime.

We process your personal data on the basis that we have a legitimate interest in preventing fraud and money laundering, and to verify identity, in order to protect our business and to comply with laws that apply to us. Such processing is also a contractual requirement of the services or financing you have requested.

Fraud prevention agencies can hold your personal data for different periods of time, and if you are considered to pose a fraud or money laundering risk, your data can be held for up to six years.

## **Automated decisions**

As part of the processing of your personal data, decisions may be made by automated means. This means we may automatically decide that you pose a fraud or money laundering risk or if our processing reveals your behaviour to be consistent with that of known fraudsters or money launderers; or is inconsistent with your previous submissions; or you appear to have deliberately hidden your true identity. You have rights in relation to automated decision making: if you want to know more please contact us using the details provided.

## **Consequences of processing**

If we, or a fraud prevention agency, determine that you pose a fraud or money laundering risk, we may refuse to provide the services and financing you have requested, or to employ you, or we may stop providing existing services to you.

A record of any fraud or money laundering risk will be retained by the fraud prevention agencies, and may result in others refusing to provide services, financing or employment to you. If you have any questions about this, please contact us on the details provided.

## **Data transfers**

Whenever fraud prevention agencies transfer your personal data outside of the European Economic Area, they impose contractual obligations on the recipients of that data to protect your personal data to the standard required in the European Economic Area. They may also require the recipient to subscribe to "international frameworks" intended to enable secure data sharing.

## **Your rights**

Your personal data is protected by legal rights, which include your rights to object to our processing of your personal data; request that your personal data is erased or corrected; request access to your personal data.

For more information or to exercise your data protection rights please, please contact us using the contact details provided.

You also have a right to complain to the Information Commissioner's Office which regulates the processing of personal data.

# How We Use Your Information – GDPR Privacy Statement for Finance My Car 365

This policy applies to information we hold about you. By ‘information’ we mean personal and financial information about you that we collect, use, share and store. Finance My Car 365 (and its associated trading styles) may change this policy from time to time by updating this page. You should check this page periodically to ensure that you are happy with any changes.

## Who we are

Finance My Car 365 are a data processor and are committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified, then you can be assured that it will only be used in accordance with this privacy policy statement.

Finance My Car 365 (Hollytree Trade Sales Limited)

**Head Office Address:** 78 Midland Road, Nuneaton, CV11 5DY

**Telephone Number:** 02475 092 223

**ICO Registration Number:** ZA462665

**Company Number:** 10707767

## Why we need Customer Information

We need to know your personal data in order to provide you with the goods/services you are applying for. If you do not provide this information, then we will be unable to provide the goods/services advertised. We will not collect any information from you that we do not need in order to provide and oversee the goods/services you are applying for.

## Our Legal Basis For Processing Your Information

We collect your information to provide our services to you and to help us develop new and improved products and services to meet our customers’ needs. You as the data subject have given consent to the processing of their personal data for one or more specific purposes. We also use your information to carry out checks for security, to prevent fraud and money laundering, to check your identity before we provide services to you, for training, and to communicate with you. We may use automated processes whenever we use your information.

Data protection law allows us to use personal information for our genuine and legitimate reasons as long as we respect your rights and freedoms. This lawful basis for using your information is called ‘legitimate interests’. When we rely on our

legitimate interests as the legal basis for processing your personal information for the purposes set out above, we will carefully consider and balance any possible effect this may have on you and your rights.

## **What we will do with customers' information**

All the personal data we hold about you will be processed by our staff and systems in the United Kingdom. Your information may be passed to third parties, where required, to provide the goods/services you have applied for, as well as where there is a legal obligation for us to provide third parties with this information e.g. The FCA or The Police, to prevent, detect, investigate and prosecute fraud and alleged fraud, money laundering and other crimes, and to confirm your identity.

We will use your data to process your application for goods/services provided by Hollytree Trade Sales Limited. This processing will include some or all of the below:

### Automated decision making

- We use automatic decisions as part of our process, as do some of the finance companies that your application may be sent to.
- This will involve automatically requesting information from CRAs and using this data along with the other data provided to assess your suitability for the goods/services requested.

### Passing to Credit Reference Agencies, to generate credit searches.

- We and external lenders on our panel will search your record at credit reference agencies. The record of our search will NOT be seen by other organisations when you apply for credit in the future, unless you take up an offer of credit from a subsidiary or linked company of Hollytree Trade Sales Limited. However, searches made by external lenders on our panel may show depending on the type of search they use.
- If you are an owner, director or partner in a business, we may also check on your business. We will also check on any proposed guarantor, so you must have their permission to disclose their information.
- If you enter into an agreement with us, or one of the external lenders on our panel, information on this agreement will be passed to the CRAs. Information remains on file for 6 years after the account is closed.
- The personal information we have collected from you will be shared with fraud prevention agencies who will use it to prevent fraud and money-laundering and to verify your identity. If fraud is detected, you could be refused certain services, finance or employment. Further details of how your information will be used by us and these fraud prevention agencies, and your data protection rights, can be found below.
- The Credit Reference Agencies we use are:
  - Experian – [www.experian.co.uk](http://www.experian.co.uk)
  - CIFAS checks will be undertaken by finance companies as part of their underwriting

### Passing to Finance Companies for them to underwrite your application.

- Your application may be passed to more than one finance company in order for us to obtain the most appropriate and suitable offer to your personal circumstances.
- Suitable lenders are identified by either one or both of:
  - Proprietary Credit Scoring and Analysis technology
  - Manual underwriters reviewing applications
- Your application may be sent to a selection of lenders on our list, lender selection is based on a large number of criteria including but not limited to; information on credit files, proposal and affordability data, the vehicle the application is made against etc.

### Statistical Analysis

- Anonymised data on previous customer transactions is used to improve the products and services we offer, as well as to understand and improve the accuracy of our underwriting.

## **Who the customers data will be shared with**

We may pass your information to our other Group Companies, authorised dealers and their technology providers, and other selected providers of our products and services for these purposes

We sometimes need to share the personal information we process with the individual themselves and also with other organisations. Where this is necessary we are required to comply with all aspects of the Data Protection Act (1998) and the General Data Protection Regulation (2018)

We are a credit broker not a lender, we will pass information to lenders on our panel.

We will not pass your data to other third parties that do not offer our products or services.

## **Whether the data will be sent overseas**

Hollytree Trade Sales Limited and associated group companies will never send customer data outside the EEA.

## How long we and other organisations will keep the data

We will keep your information for as long as is needed for the purposes set out above or as required by any laws that apply.

If we refuse your application, or you decide not to go ahead with your application, we'll still keep your information.

## Customers Rights

As a customer of Hollytree Trade Sales Limited you have the following rights related to your data and how it's processed:

- The right to be informed – this means we must provide, at the point of collecting your data, a privacy or verbal notice informing you of how your personal information will be used.
- The right to access your personal information – this means that you have the right to know what information we hold on you, and to request a copy of it. This information is provided free of charge.
- The right to get inaccurately recorded information corrected.
- The right to erasure – this means that you can request that your personal data is deleted from our records, also referred to as 'the right to be forgotten'.
- The right to restrict how your personal information is used – this means that you have the right to object to how we use your personal information, including for direct marketing purposes.
- The right to receive your personal information in a legible and transferable format.
- The right to object to the use of your personal information
- Rights related to automated decision making including profiling – this means you have the right to refuse to your personal information being used to make a decision based on an automatic process without human intervention

For further information on how to action any of these rights please contact the data protection officer at the address on this statement.

## How customers make a complaint

Should you wish to make a complaint, you can do so by:

**Letter**      Finance My Car 365, 78 Midland Road, Nuneaton, CV11 5DY

**Email**      [financemycar365@gmail.com](mailto:financemycar365@gmail.com)

**Telephone**    02475 092 223

If we do not handle your complaint to your satisfaction within 8 weeks, you have the right of referral to the ICO who act as the data protection arbitrator.

Details of how to contact the ICO are at this web address <https://ico.org.uk/global/contact-us/>

## **What we do to keep customers data secure**

We are committed to ensuring that your information is secure. In order 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.

## **How we use cookies**

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system. Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not.

This website uses cookies in a number of ways which are as follows:

### Aggregated site usage statistics

Cookies may be placed on your computer, phone or other Internet device to provide us with aggregated data of the usage of this site and the mediums which are driving traffic to the site. The data gathered by these is aggregated and therefore your individual usage of this site cannot be attributed to you.

### Essential site features

Cookies may be placed upon your computer, phone or other Internet device in order to provide essential site features such as allowing you to compare different cars in stock and complete enquiry forms quickly.

### Complementary site features

The site may also use Cookies for certain complementary purposes such as showing you the car that you last looked at on the home page. All these functions are designed to improve your experience of using the site. A cookie in no way gives us

access to your computer or any information about you, other than the data you choose to share with us. You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.