

## **IMPORTANT: USE OF YOUR PERSONAL INFORMATION STATEMENT**

The following information explains how Ford Credit will use and disclose your personal information. If you have purchased your vehicle through a supplying dealer or online through Ford Motor Company, they will also collect information from you that may be used by them in accordance with their privacy policy, which may differ from ours. To see how they will use your personal data please speak to your dealer or where you have purchased your vehicle on line visit Ford Motor Company's website.

### **1. About us**

Ford Credit is a data controller. If you wish to contact us please write to us at Ford Credit, Manchester Business Centre, Number One, 1 Tony Wilson Place, Manchester, M15 4FN or call us on 0345 755 1234.

Our data protection officer can be contacted by emailing [dpeurope@ford.com](mailto:dpeurope@ford.com)

### **2. Personal data we collect**

We collect personal data about you in various ways, both from you and from third parties. The ways in which we collect such information include:

- (i) when you make applications to us for products and services, when you register with us for products and services, when you contact us for any reason, during financial reviews and if you participate in any surveys or competitions which we run;
- (ii) from third parties such as Credit Reference Agencies (CRAs), Fraud Prevention Agencies (FPAs), group companies and from publicly available sources such as the electoral roll and online or internet based resources;
- (iii) from analysis of your performance of agreements with us and any of our subsidiaries, associated companies or parent companies ("Group"), and your use of our and our Group's services.

The legal bases by which we process your personal data is for us to be able to perform this Agreement, to comply with our legal obligations and for our legitimate interests comprising the administration of our business and our products and services, and the prevention of fraud. We shall only direct market to you where we have your explicit consent.

If you are a joint applicant or if you have told us of some other financial association with another person, you must be sure that you are entitled to:

- (i) disclose information about your joint applicant and anyone referred to by you;
- (ii) authorise us to search, link or record their information at CRAs, FPAs and search for and cross check their information using other publicly available sources.

In addition, you must ensure that the person knows who we are, what we will do with their data and whom we will share it with.

You shall ensure that the provisions of this personal information statement are brought to the attention of any joint applicant or other person to which you have a financial association in connection with this Agreement.

### **3. How we use your personal data**

We may use your personal data for the following purposes:

- (i) to assess and consider applications you make for products and services and to make decisions about such applications, including making checks at CRAs and FPAs as described in section 5;
- (ii) to provide you with products and services and for the administration of our relationship with you;
- (iii) to respond to enquiries and communications from you;

- (iv) for the prevention and detection of crime and fraud, including tracing your whereabouts, and for the prosecution of offenders;
- (v) to identify products and services which may be of interest to you and to contact you to tell you about such products and services, subject to your consent and in accordance with your preferred communication methods;
- (vi) for statistical analysis, management of our and our Group's business, market research, training and evaluating the effectiveness of our marketing and customer service.

#### 4. Disclosures we make of your personal data

We will maintain the privacy and confidentiality of your personal data but may share and make disclosures to of your information:

- (i) to CRAs and FPAs as described in section 5;
- (ii) if required by law, government authority or agency, or pursuant to a court order;
- (iii) to our Group, their and/or our advisors, agents and others who provide services to us or our Group, as required for the purposes set out above;
- (iv) to law enforcement agencies and others for the purposes of investigating or preventing crime;
- (v) in the event of an insurance claim, to your insurance provider(s) who provides insurance products in relation to the Vehicle and/or this agreement and other companies in their group and their respective agents and contractors. Such information may be shared with other insurers and agents via a register of claims for the purposes of fraud prevention and underwriting;
- (vi) to motor dealers;
- (vii) to any potential buyers, transferees and/or merger partners in relation to all or part of our or our Group's business, and such parties' advisors, for the purposes of considering the transaction; and
- (viii) if you so consent, or as provided for in this agreement.

If you have a Guarantor, you authorise us to disclose to the Guarantor all details of your account, including the amounts and dates of payments that you have made or have missed, any notes or recorded conversations and you authorise us to act upon any instructions given by the Guarantor in the same way as if those instructions had been given by you. Guarantors will receive a personal information statement about how FCE use and disclose their personal information when they make their application.

A summary of the categories of who we may share your personal data with is set out below. If you would like any further information on this please contact [dpeurope@ford.com](mailto:dpeurope@ford.com)

Account monitoring and operation	Insurance Services	Regulatory Monitoring and Services
Credit Reference Agencies	Legal Services	Regulatory Reporting
Complaints Management Services	Lending Decisions	Sales Monitoring and Services
Customer Services	Marketing Campaigns and Services	Information Technology support
Debt Management Services	Payment Systems and Services	Document Management
Fraud Monitoring and Services	Professional Services	

## 5. Our use of Credit Reference Agencies, Fraud Prevention Agencies

### Credit Reference Agencies

In order to process your application, FCE and trusted third party providers will perform credit and identity checks on you with one or more Credit Reference Agencies ("CRAs"). FCE may also make periodic searches at CRAs to manage your account with us.

To do this, we will supply your personal information to CRAs and they will give us information about you. This will include information from your credit application and about your financial situation and financial history. CRAs will supply to us both public (including the electoral register) and shared credit, financial situation and financial history information and fraud prevention information.

We will use this information to:

- (i) Assess your creditworthiness and whether you can afford to take the product;
- (ii) Verify the accuracy of the data you have provided to us;
- (iii) Prevent criminal activity, fraud and money laundering;
- (iv) Manage your account(s);
- (v) Trace and recover debts; and
- (vi) Ensure any offers provided to you are appropriate to your circumstances.

FCE will continue to exchange information about you with CRAs while you have a relationship with us. We will also inform the CRAs about your settled accounts. If you borrow and do not repay in full and on time, CRAs will record the outstanding debt. This information may be supplied to other organisations by CRAs.

When CRAs receive a search from us they will place a search footprint on your credit file that may be seen by other lenders.

If you are making a joint application, or tell us that you have a spouse or financial associate, we will link your records together, so you should make sure you discuss this with them, and share with them this information, before lodging the application. CRAs will also link your records together and these links will remain on your and their files until such time as you or your partner successfully files for a disassociation with the CRAs to break that link.

If you exercise a right to withdraw from the agreement leaving sums outstanding, we will notify this debt to the CRAs. We may also use information obtained from your performance of this and any other agreement you have with us and our Group. If you have lived in another country within the last three years we may ask our Group to search your record with CRAs in that location.

If you are a business or a director, FCE will search the personal record of you, your partners and/or your directors and company secretary in addition to the record of your business at such CRAs and they will keep details of our search. Information held about you (and where you are a business, your partners and/or directors and company secretary) by these agencies may already be linked to records relating to other people with whom you have a financial association. In connection with your application, you may be treated as financially linked with them and assessed with reference to any such associated records. This information will be available to other businesses and organisations that make similar searches.

The identities of the CRAs, their role also as fraud prevention agencies (please see below), the data they hold, the ways in which they use and share personal information, data retention periods and your data protection rights with the CRAs are explained in more detail from each of the three CRAs – clicking on any of these three links will also take you to the same document setting out this information:

Callcredit [www.callcredit.co.uk/crain](http://www.callcredit.co.uk/crain);

Equifax [www.equifax.co.uk/crain](http://www.equifax.co.uk/crain);

Experian [www.experian.co.uk/crain](http://www.experian.co.uk/crain)

### **Fraud Prevention Agencies**

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 on our website [www.fcebank.com/DP](http://www.fcebank.com/DP)

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.

#### 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 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 above.

#### International 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.

We and other organisations, both in this country and abroad, may access and use the information recorded by FPAs for the following purposes:

- (i) checking details on applications for credit and credit related or other facilities, such as insurance and financial services made by you and members of your household;
- (ii) managing credit and credit-related accounts or facilities such as insurance proposals and insurance claims for you and members of your household. We and other organisations may also access and use this information to prevent fraud and money laundering, for example when checking details and claims for all types of insurances; to otherwise check your identity, trace debtors, recover debt, and to manage your accounts or insurance policies;
- (iii) for the management and administration of the agreement, your accounts or insurance policies;
- (iv) to carry out statistical and business analysis, including but not limited to analysis about credit, insurance and fraud;

- (v) to help make credit decisions following the commencement of this agreement including but not limited to the re-assessment of a credit limit. For these purposes we may make further searches; and
- (vi) to check details for job applications and employees.

FCE may also use a credit scoring system using information received from you and the CRA's (as explained above). The use of a credit scoring system may include an automated decision where there is a positive outcome on your application. In cases where there is not a positive automated outcome, a careful review will be undertaken by FCE and additional information may be required prior to determining the outcome of your application. If you wish to have an automated decision reviewed by someone or if you disagree with the outcome you can contact us in writing at Ford Credit, Manchester Business Centre, Number One, 1 Tony Wilson Place, Manchester, M15 4FN or call us on 0345 755 1234

## 6. Other checks FCE may perform

FCE may also use information obtained from your performance of the Agreement and any other agreement you have with FCE, any or all of FCE's subsidiary or associated companies and FCE's parent company, in relation to credit and identity checks.

## 7. International transfers of your personal data

The information that we hold about you may also be transferred to our Group and/or carefully selected third parties outside the European Economic Area (EEA). Any such transfers will be made for the purpose of processing, business administration, statistical analysis and management reporting. Countries where your data may be transferred to include, the United States of America, Argentina, Brazil and India. We will only transfer your personal information outside of the EEA where either the transfer is to a country which the EU Commission has decided ensures an adequate level of protection of your personal information or we have put in place measures to ensure that your data is protected, treated in accordance with the law, and subject to appropriate safeguards, using contractual obligations approved by the EU Commission or relevant regulators, such as EU standard model contractual clauses. We also use the EU Commission approved EU-US Privacy Shield when we transfer personal information to the United States of America.

For further information about the use of standard model contractual clauses as detailed by the Information Commissioners Office please visit their website and search for 'International Transfers' [www.ico.org.uk](http://www.ico.org.uk)

For further information about Privacy Shield please visit [www.privacyshield.gov/welcome](http://www.privacyshield.gov/welcome)

For any further information, please contact our data protection officer by emailing [dpeurope@ford.com](mailto:dpeurope@ford.com)

## 8. Your rights

Individuals have certain rights under privacy legislation from time to time. A summary of your rights is set out below.

1. <b>The right of access</b>	You have the right to obtain access to your information, and certain other information.
2. <b>The right to rectification</b>	You are entitled to have your information corrected if it is inaccurate or incomplete.

<b>3. The right to erasure</b>	This is also known as 'the right to be forgotten' and may enable you to request the deletion or removal of your information where there is no compelling reason for it to be kept. This is not a general right to erasure; there are exceptions.
<b>4. The right to restrict processing</b>	You have rights to 'block' or suppress further use of your information in certain circumstances. When processing is restricted, an organisation can still store your information, but may not use it further.
<b>5. The right to data portability</b>	You have the right to obtain and reuse your personal data in a structured, commonly used and machine readable format in certain circumstances.
<b>6. The right to object</b>	You have the right to object to certain types of processing, in certain circumstances. In particular, the right to object to the processing of your personal data based on the legitimate interests of an entity or on public interest grounds; the right to object to processing for direct marketing purposes (including profiling); the right to object to the use of personal data for scientific or historical research purposes or statistical purposes in certain circumstances.

For more information on your rights or to make a request as set out above please visit or apply in writing to: The Customer Services Manager, Ford Credit, Manchester Business Centre, Number One, 1 Tony Wilson Place, Manchester. M15 4FN

## 9. Questions and complaints

If you have any questions or complaints about our processing of your personal data, you may contact us in writing at: The Customer Services Manager, Ford Credit, Manchester Business Centre, Number One, 1 Tony Wilson Place, Manchester. M15 4FN.

FCE's data protection officer can be contacted at [dpeurope@ford.com](mailto:dpeurope@ford.com).

You also have the right to lodge a complaint with a regulator of data privacy law. This could be the relevant regulator in the country in which you live, work or where an alleged infringement of data privacy law has occurred. In the UK, the relevant regulator is the Information Commissioner and can be contacted if you believe that FCE's use of your personal data is not compliant with applicable law and regulation. Further information can be found at [www.ico.org.uk/](http://www.ico.org.uk/)

## 10. How long we keep your information

FCE will not retain your information for longer than is required for the purposes of this Agreement, as required by law or for the prevention or detection of fraud, whichever is the longer, or for marketing purposes (subject to your marketing preferences). If you have agreed to receive direct marketing, please be aware that following the settlement of your account you may continue to receive marketing for up to 8 weeks while our systems are updated to reflect that your account has been settled.

#### **11. Changes to this statement**

FCE may modify this statement and notify you of any material changes from time to time. The most up to date version of this statement can be found on our website [www.fcebank.com/DP](http://www.fcebank.com/DP)