

## IMPORTANT: USE OF YOUR PERSONAL INFORMATION STATEMENT

### 1. Who we are

The following information explains how FCE Bank plc (Ford Credit) as the 'data controller' will use and disclose your personal information. To contact us please write to the address in section 12.

If you have purchased your vehicle through a supplying dealer or via the Ford Motor Company website, they will also collect information from you. To understand how they will use your personal data please speak to your dealer or visit Ford Motor Company's website.

### 2. Information we collect

We collect personal data about you in various ways, both from you and from third parties such as Credit Reference and Fraud Prevention Agencies, from our subsidiaries, associated companies or parent companies ("Group") as well as from publicly available sources, for example the Electoral Roll.

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, during financial reviews and if you participate in any surveys or competitions.
- (ii) from analysis of your performance of agreements with us and any of our Group, and your use of our and our Group's services.
- (iii) from data, transmitted or collected from your vehicle in connection with insurance, marketing and the location of our vehicle.

If you are a joint applicant or if you have told us of some other financial association with another person, please ensure that you have the permission to:

disclose information about the other parties to us.

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, we recommend that you provide a copy of this statement to the other parties.

### 3. The legal basis by which we process your personal data

- (i) to comply with our legal obligations for example anti money laundering
- (ii) for our legitimate business interests for example developing products and services
- (iii) with your consent, we may:
  - a) send you direct marketing (in accordance with your communication preferences);
  - b) view your screen for support purposes.
  - c) process biometric data (for example, for identity verification purposes); and
  - d) in limited circumstances and with your explicit consent we may collect information you provide about your health where necessary to support your ability to make payments.

### 4. How we use your personal data

We may use your personal data for the following purposes:

- (i) to assess and consider applications including making checks at CRAs and FPAs as described in section 6 and to verify your identity; Identity checks will include photo and video recordings, copies of documentation and the validation of your identity using on-line applications that you have chosen to register with.
- (ii) to provide you with products and services and for the administration of our relationship with you. This may include the registration of on-line tools such as Account Manager Online.
- (iii) to administer your account e.g. collecting loan repayments, providing you with account statements and notices, dealing with any queries or complaints you may have
- (iv) for the prevention and detection of crime, fraud and money laundering
- (v) tracing your whereabouts, **including using your vehicle's location data**, to recover the vehicle where you have breached your agreement with us.
- (vi) to identify products and services which may be of interest to you
- (vii) to contact you to tell you about such products and services (direct marketing)
- (viii) for statistical analysis, management of our Group's business, market research, evaluating the effectiveness of our marketing and customer service and providing supplemental training.

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

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

- (i) to CRAs and FPAs as described in section 6;
- (ii) if required by law, government authority or agency, or pursuant to a court order.
- (iii) Legal and regulatory bodies, such as the Financial Conduct Authority (FCA), the Prudential Regulation Authority (PRA), HMRC, the Information Commissioner's Office (ICO), the Financial Ombudsman Service (FOS)
- (iv) to members of our Group, their and/or our suppliers, advisors, agents and others who provide services to us or our Group, as required for the purposes set out above;
- (v) to law enforcement agencies and other regulated bodies for the purposes of investigating or preventing crime;
- (vi) 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;
- (vii) to motor dealers; for example, in connection with your application, the management and the settlement of your

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finance agreement.

- (viii) Should your dealer cease trading or is no longer a Ford authorised Dealership, we will where applicable, share information with an alternative dealership to ensure that you receive appropriate support and communications;
- (ix) to any buyer, 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
- (x) if you request us to share your data with other third parties
- (xi) Debt collection agencies to seek to recover any debt owed to us
- (xii) Organisations that provide us with business support services. For example, back-up and server hosting, IT software and maintenance platforms

## 6. Our use of Credit Reference Agencies & Fraud Prevention Agencies

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

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, financial crime, 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.

Ford Credit 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 maybe seen by other lenders.

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, Ford Credit will search the personal record of you, your partners and/or your directors and company secretary in addition to the record of your business with a number of 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.

For further information, please see the following:

TransUnion [www.transunion.co.uk/crain](http://www.transunion.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)

The personal information we have collected from you will be shared with fraud prevention agencies to help us make credit related decisions. Your personal data will be used to prevent fraud and money laundering, and to verify your identity.

If fraud is detected or you give us false or inaccurate information and we suspect or identify fraud we will record this and may also pass this information to fraud prevention agencies and other organisations involved in crime and fraud prevention.

- (i) 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. Please note, that your approval status for finance with Ford Credit is valid up to 90 days only. If the delivery of your vehicle is delayed beyond this time, further credit worthiness checks with the credit reference agencies may be performed, which will leave a footprint on your credit file that will be seen by other lenders and may result in a change in our decision to grant you finance. *and*
- (ii) to check details for job applications and employees.

## 7. Automated decision making

As part of the processing of your personal data, decisions may be made by automated means. This means that we sometimes make decisions about you using only technology, where none of our employee or individuals have been involved.

For example, we may do this to decide whether to offer you a product or service.

If you wish to have an automated decision reviewed by someone you can contact us in writing at the address in section 12.

## 8. Criminal Conviction and Special category Data

We will only process personal data relating to criminal convictions or offences and alleged offences where you have provided the information to us or where the law permits us to do so e.g. to perform checks, to prevent and detect crime and to comply with laws relating to money laundering, fraud, terrorist financing, bribery and corruption and international sanctions. Where you provide information to us, for example about your health, this will be used to support discussions with you about your financial circumstances.

## 9. Other checks Ford Credit may perform

Ford Credit will share and use information about the performance of your agreements with FCE, and members of our Group, in relation to credit and identity checks.

## 10. International transfers of your personal data

The information that we hold about you may also be transferred to our Group and third parties outside the UK or the European Ford Credit is a trading Style of FCE Bank plc. Registered in England: No 772784. Registered Office: Arterial Road, Laindon, Essex, SS15 6EE. VAT No. GB 246 4257 57. FCE Bank plc is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority under firm reference number 204469.

Economic Area. Any such transfers will be made for the purpose of processing, business administration, statistical analysis and management reporting. We will put in place measures to ensure that your data is protected, treated in accordance with the law, and subject to appropriate safeguards.

## 11. Your rights

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

- 1. The right of Access** You have the right to obtain access to your information, and certain other information
- 2. The right to rectification** You are entitled to have your information corrected if it is inaccurate or incomplete.
- 3. The right to erasure** **You have the right to request the deletion or removal of your information where there is no compelling reason for it to be kept.**
- 4. The right to restrict processing** You have rights to 'block' or suppress further use of your information in certain circumstances.
- 5. The right to data portability** You have the right to obtain, reuse and have your personal data disclosed to third parties in a structured, commonly used and machine-readable format.
- 6. The right to object** You have the right to object to certain types of processing. For example, for direct marketing (including profiling).

For more information on your rights please use the address in section 12.

You are responsible for making sure that you give us accurate and up to date information throughout this agreement period.

## 12. How to contact us about the use of your data

If you have any questions or concerns about the use of your personal data, you may contact the Data Protection Officer in writing to: The Data Protection Officer, Ford Credit, Manchester Business Centre, 8 First Street, Manchester. M15 4RP. Or at [dpeurope@ford.com](mailto:dpeurope@ford.com).

If we cannot resolve a complaint to your satisfaction, you also have the right to lodge a complaint with a Data Protection Supervisory authority. In the UK, the relevant regulator is the Information Commissioner. Further information can be found at [www.ico.org.uk/](http://www.ico.org.uk/).

## 13. How long we keep your personal data

Ford Credit will not retain your personal data for longer than is required for the purposes of this agreement, as required by law or for the prevention or detection of fraud.

Finance agreements are retained for a maximum period of 7 years after you have fulfilled all loan payment obligations;

## 14. Changes to this statement

Ford Credit 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).