

# SIEMENS

## Siemens Financial Services Fair Processing Notice

### Use of personal information

Please read this notice carefully and in full as it contains important information regarding how we will use your personal data when you enter into a finance agreement with us.

#### 1. Who we are:

We are Siemens Financial Services Limited which forms part of the Siemens Group ("we", "us" or "our"). A list of our Group companies can be found on our [website](#). We are what is known as the 'controller' of personal information we gather and use. Our Data Protection Advisor can be contacted by calling +44 (0)1753 434259 or by writing to The Data Protection Advisor, Siemens Financial Services Limited, Sefton Park, Bells Hill, Stoke Poges, Buckinghamshire, SL2 4JS.

#### 2. How we use your personal information:

We use your personal information to provide you with products and services (including making credit decisions about you) to comply with the law and enforce our legal rights (including debt recovery), and to improve and market our products and services (including research). Use of your information may include automated decision-making including profiling, as set out in clause 9 below.

#### 3. Our legal bases for using your personal information:

We only use your personal information where that is permitted by laws that protect your privacy rights. When we enter into a finance agreement with you, we will use your personal information where:

- (i) We have your consent (if consent is needed);
- (ii) We need to use the information to comply with our legal obligations;
- (iii) We need to use the information to perform a contract with you; and/or
- (iv) It is fair to use the personal information either in our interests or someone else's interests, where there is no disadvantage to you - this can include where it is in our interests to market additional products or services to you.

#### 4. Your rights:

You have the right to access, correct, in some cases delete, restrict and object to how we process your personal information. You also have a right to complain to the data protection regulator, the Information Commissioner's Office (the "ICO"). Details of how to make a complaint to the ICO are contained on their [website](#).

#### 5. Our products and services:

We need some personal information before we can provide our products and services to you; for example, to

allow us to check your identity. In some cases we won't be able to provide products and services to you if we don't have all the personal information we need.

#### 6. Sharing and transferring personal information:

We may use the information referred to above and disclose it to a third party who introduced you to us for the purposes of reviewing the conduct of each agreement for credit assessment, to our insurance management contractor who may contact you for the purposes of reviewing your compliance with the insurance obligations imposed upon you under each agreement, for administering and servicing each agreement and to enable us to carry out statistical analysis.

We may also share personal information with our suppliers and other third parties where needed to provide you with the best service. We also share personal information with regulators and other banks for law enforcement. Sometimes we transfer personal information to other countries outside the UK for these purposes, where we will ensure sufficient protections are in place to safeguard your personal data. You have a right to obtain a copy of the suitable safeguards in place and you can obtain this by contacting the Data Protection Advisor whose details we have set out above.

Finally, we may also share your personal data with a third party if we syndicate part of our group portfolio.

#### 7. Keeping personal information:

We keep your personal information securely for as long as we need to for the purposes of the particular finance agreement. To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of the personal data, the purposes for which we process the personal data and whether we can achieve the purposes through other means, and applicable legal requirements.

#### 8. Your consent:

Sometimes we may need your consent to use your personal information (for example, for marketing). However, we won't always ask for consent to use personal information - for example, if we need it to meet regulatory requirements or to perform a contract with you. Where you have given us consent, you have the right to withdraw it at any time by contacting our Data Protection Advisor using the details above.

#### 9. Automated decision making:

Sometimes we use your personal information in automated processes to make decisions about you, such as credit scoring. We might also use automated processes to create a profile of you. We do this to help

ensure decisions are made accurately, fairly and efficiently.

## **10. Credit reference agencies and fraud prevention agencies:**

In considering your application, we will search the personal information held on your records at credit reference agencies and fraud prevention agencies. We may use a credit scoring system when assessing your application. We will also add to your record with the credit reference agencies details of your payments and any default or failures under each Agreement. We will also make periodic searches of your records during the life of each Agreement. It is important that you give accurate information to us. Where you are a company you must inform all your directors of this notice as credit searches will also be carried out using their personal information for these purposes.

Before entering into each finance agreement we may search records at credit reference agencies, which may be linked to your spouse/partner, or other persons with whom you are linked financially. You may be treated as financially linked and you will be assessed with reference to "associated records". We, the credit reference agencies and the fraud prevention agencies will also use your records for statistical analysis about credit, insurance and fraud. All organisations that collect and process personal data are regulated and, overseen by the Information Commissioner's Office and European Data Protection Supervisory Authority. All credit reference agencies are in regular dialogue with the Information Commissioner. Use of the Electoral Register is controlled under the Representation of the People Act 2000. When credit reference agencies receive a search from us they will:

- (i) Place a search "footprint" on your credit file whether or not the application proceeds. If the search was for a credit application the record of that search (but not the name of the organisation that carried it out) may be seen by other organisations when you apply for credit in the future which may have an effect on any future application for credit by you; and
- (ii) Link together the records of you and anyone that you have advised is your financial associate including previous and subsequent names of parties to the account. Links between financial associates will remain on your and their files until such time as you or your spouse/partner, or other persons with whom you are linked financially successfully files for a disassociation with the credit references agencies.

They will also supply to us:

- (i) Credit information such as previous applications and the conduct of the accounts in your name and of your associate(s) and/or your business accounts (if you have one);
- (ii) Public information such as County Court Judgements (CCJ's) and bankruptcies;
- (iii) Electoral Register information; and
- (iv) Fraud prevention information;

Where you have been provided with a finance facility by us or may enter into a finance account facility with us we will give the details of your personal and/or business account (if you have one), including names and parties to the account and how you manage it/them to credit reference agencies.

If you have been provided with a finance facility and do not repay in full and on time, we may tell credit reference agencies and may be used and shared by us and them to:

- (i) Consider applications for credit and credit related services or other facilities, for you and any associated person; and
- (ii) Trace debtors, recover debts, prevent and detect money laundering and fraud and to manage your account(s).

Records shared with credit reference agencies remain on file for 6 years after they are closed whether settled by you or defaulted.

Fraud prevention and credit reference 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, managing credit and credit related accounts for facilities and checking details of job applicants and employees. We and other organisations may access and use from other countries the information provided by fraud prevention and credit reference agencies. You may, by telephoning us on +44 (0)1753 434 259 obtain details of those credit reference and fraud prevention agencies from whom we pass the information about you. You have a legal right to these details. Further details explaining how the information held by fraud prevention agencies may be used can also be obtained by calling this number.

## **11. Cifas privacy notice:**

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 these fraud prevention agencies, and your data protection rights, can be found in the "Cifas privacy notice" which sets out how those agencies use personal data. Please visit [Cifas](#) to read this notice in full.

## **12. Credit reference agency information notice:**

The credit reference agencies have drafted a notice called the "Credit Reference Agency Information Notice" ("CRAIN") which sets out how your data will be processed by them. Please go to [Equifax](#), [Experian](#) or [TransUnion](#) websites to read the CRAIN in full.

## **13. Further information:**

For further details about the use of your personal information please read our Data Privacy Notice or contact our Data Protection Advisor who can provide you with a copy of our policy by calling +44 (0)1753 434259 or by writing to The Data Protection Advisor, Siemens Financial Services Limited, Sefton Park, Bells Hills, Stoke Poges, Buckinghamshire, SL2 4JS.