

# PRIVACY POLICY

## 1. General intro

1. We are committed to ensuring that we manage your personal data professionally and in compliance with all applicable data protection laws. Part of this commitment is to ensure that there is transparency about how we process personal data. This policy includes an explanation of:
  1. what data we are processing;
  2. why we are processing it and what we do with it;
  3. whether we will share it with anyone else;
  4. whether we will transfer it outside of the United Kingdom;
  5. how we keep your data safe; and
  6. your rights.
2. We hope that you find this Privacy Policy helpful. If you have any questions, please don't hesitate to contact us using the information below.

## 2. About us

1. Our company name is European Vehicle Contracts Ltd and we are located at European House, 9/10 Apex Business Village, Annitsford, Cramlington NE23 7BF. In this policy we have referred to the European Vehicle Contracts Ltd as: we, us, our or the Company Number 06532275 .
2. We also operate under the following trading names Eurodrive Motor Finance, EVC, [www.eurodrivefinance.co.uk](http://www.eurodrivefinance.co.uk).
3. For any queries concerning your data please contact us using the following information. Our Compliance or Management team will deal with all queries.
  - By Post: European House, 9/10 Apex Business Village, Annitsford, Cramlington NE23 7BF
  - By Email: [compliance@eurodrivefinance.co.uk](mailto:compliance@eurodrivefinance.co.uk)
  - By Phone: 0845 602 1901
4. We are Finance Broker, not a lender.

## 3. Your personal data

1. We process your personal data if we understand that you may be interested in purchasing our products or services.
2. Soft Searches
  1. The type of credit search that we initially do is known as a 'soft' credit check and so does not affect your credit score.
  2. Using a soft credit search allows you to get quotes without affecting your credit rating as although they are visible on your credit report they do not show up in the same way as a full credit check until you decide to proceed with a full application for a loan. However, searches made by external lenders on our panel may show on your credit profile, depending on the type of search they use.

3. Passing your details to Credit Reference Agencies

1. If you enter into an agreement with us, or one of the lenders on our panel, information on this agreement will be passed to the credit reference agencies.
2. We and lenders on our panel will search your record at credit reference agencies. This is done to ensure lenders have the necessary information to assess your financial profile, verify your identity, to help prevent fraud and to provide you with their best product options.

4. The Credit Reference Agencies we use are:

1. Experian – [www.experian.co.uk](http://www.experian.co.uk)
2. Equifax – [www.equifax.co.uk](http://www.equifax.co.uk)

For further information on Credit Reference Agencies and how they will use your data, please refer to their Credit Information Notice: [Credit Reference Agency Information Notice \(CRAIN\) | Experian](#)

5. In addition, CIFAS checks may be undertaken by finance companies (funders) as part of their own processes.

6. What data do we hold about you and how have we obtained this?

1. We will obtain information about you when you enquire about our products or services. Typically, the information that we obtain will be Name, Address History, Date of Birth, Employment history, bank details and income details.
2. If you have visited our website we may automatically collect some personal information including: details of your browser and operating system, the website from which you visit our website, the pages that you visit on our website, the date of your visit, and the Internet protocol (IP) address assigned to you by your internet service. We collect some of this information using cookies – please see Cookies section for further information. We may also collect any personal information which you allow to be shared that is part of your public profile on a third party social network.
3. Our telephone calls are recorded for training purposes and may also be used to verify any comments that were made during any conversation.
4. If you use our web chat function, we will keep a record of our communications.
5. Sometimes you will have sent your information directly to us, but you may have provided your information to supporting suppliers / dealers who in turn, has provided the information to us.

7. How do we use your personal data and what is the applicable lawful basis?

1. Where you have consented, we:

1. may provide you with marketing information about our products or the products and services of our selected partners;
2. we will keep you informed of events that we think will be of interest to you;
3. we will use your interaction with our website and with our chat function to identify which products will be the most relevant to you and deliver targeted and relevant messages to you.
4. Will share your information with our finance partners for the purposes of trying to obtain you a finance acceptance.
5. Will conduct a credit search with credit reference agencies, as will our lending partners.

\*Please note you can withdraw your consent, to do this please contact us using the above information.

2. Where we are required to do so to perform our contract with you, we may process your information for Legitimate Interest.
3. We may process your information to comply with legal obligations including assisting HMRC, the Police and the Driver and Vehicle Licensing Agency.
4. We may process your information to allow us to pursue our legitimate interests including for:
  1. analysing our performance to further improve our customer services;
  2. market research, training and to administer our websites;
  3. the prevention of fraud or other criminal acts;
  4. complying with requests from you including if you exercise any of your rights noted in this Privacy Policy;
  5. the purpose of corporate restructure or reorganisation or sale of our business or assets;
  6. enforcing our legal rights or to defend legal proceedings and for general administration purposes.
  7. providing you with marketing information about our products or the products and services of our selected partners
8. Will we share your personal data with any third parties?
  1. We may share your data with third party partners and other companies within our group, these companies include: other finance houses such as:
    - [Alphera Financial Services](#)
    - [Automoney](#)
    - [BNP Personal Finance](#)
    - [Close Brothers Motor Finance](#)
    - [CFS Autobroker for the products of FCA Automotive](#)
    - [Just Protect](#)
    - [Just Fund Me](#)
    - [Lendable](#)
    - [Mann Island](#)
    - [Marsh Finance](#)
    - [Moneybarn Finance](#)
    - [Motonovo Finance](#)
    - [Oodle Finance](#)
    - [Paragon Finance](#)
    - [PCF Bank](#)
    - [V12 Asset Finance](#)
  2. We may disclose your information to our third-party service providers for the purposes of providing services to us or directly to you on our behalf e.g. advertising agencies or administrative service providers. When we use third party service providers, we only disclose to them any personal information that is necessary for them to provide their service and we have a contract in place that

requires them to keep your information secure and not to use it other than in accordance with our specific instructions.

3. If we sell all or part of our business to a third party, we may transfer your information to that party to ensure that it can continue to provide information that you have requested or for any of the other purposes that we have noted above.
  4. We may transfer your data to government or other official bodies for the purposes of complying with legal obligations, for enforcing our rights, or for the prevention or detection of a crime.
9. How long do we keep your data?
1. If you have expressed an interest in buying products from us or from our selected partners, we will retain your contact details and related information concerning your enquiry for 7 years from the date that we last had contact with you.
  2. If you have purchased products from us or from our selected partners, we will keep the data relating to that purchase (e.g. order forms and invoices and related correspondence) for 7 years from the termination of the contract or the most recent financial transaction.
  3. If you have requested that we do not send you marketing information we will always retain sufficient information to ensure that we remember to comply with your request.
  4. The periods stated in this section may be extended if we are required by law to keep your data for a longer period.

#### **4. Transferring your data outside of the United Kingdom ('UK')**

1. The information that you send to us may be transferred to countries outside of the countries outside the UK. By way of example, this may happen where any of our finance partners (listed above) transfer your data outside of the UK. We recommend you read these in full to understand how your information will be used.
2. If we transfer your information outside of the UK, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected. These measures include imposing contractual obligations on the recipient of your personal information or ensuring that the recipients are subscribed to 'international frameworks' that aim to ensure adequate protection. Please contact us if you would like more information about the protections that we put in place.
3. If you use our services whilst you are outside the UK, your information may be transferred outside the UK to provide you with those services. Please note we are limited to what service we can provide if you are outside of the UK

#### **5. Cookies**

1. We use Cookies on our website. A cookie is a small text file which is placed onto your computer (or other electronic device) when you visit our website. This enables us to monitor how many times you visit the website, which pages you go to, traffic data, location data and the originating domain name of your internet service provider.
2. You can find out more about the Cookies we use in our [Cookies Policy](#) available on the home page of our website.
3. You can set your browser not to accept cookies, however some of our website features may not function as a result.
4. For more information about cookies generally and how to disable them you can visit: [www.allaboutcookies.org](http://www.allaboutcookies.org).

## **6. Data security**

1. We have adopted appropriate technical and organisational measures to protect the personal data we collect and use having regard to the state of the art, the nature of the data stored and the risks to which the data is exposed to human action or the physical or natural environment. However, as effective as our security measures are, no security system is impenetrable. We cannot guarantee the security of our database.
2. The transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we have received your information, we will use procedures and security features to try to prevent unauthorised access
3. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

## **7. Links to other websites**

1. Our website may contain links to and from other websites (e.g. social media sites such as Twitter, Flickr, YouTube and Facebook). Unless we own such websites, we accept no responsibility for the way in which they process your personal data. You are recommended to check the privacy policy of each website before you submit any personal data to it.

## **8. Your rights**

- The right to be informed
  - The right of access
  - The right to rectification
  - The right to erasure
  - The right to restrict processing
  - The right to data portability
  - The right to object
  - Rights in relation to automated decision making and profiling.
1. You can exercise your rights at any time by using the contact information listed in section 2 of this policy.
  2. If you would like further information on your rights, our team will try to assist you where possible, or you can find further information [here](#).

## **9. Initial Disclosure Document**

1. We are regulated by The Financial Conduct Authority (FCA) FRN 679612. You can check our status on the FCA's website [www.FCA.gov.uk/register](http://www.FCA.gov.uk/register) or by contacting the FCA on 0300 500 8082. The FCA acts as an independent regulator within the financial services sector and as part of our compliance process, we are required to provide you with a document called an 'Initial Disclosure Document'. This document provides information about us, the services we will provide, what we charge for our services, the rates we offer and the commission arrangements between our lenders and our introducing suppliers.

## **10. What services do we provide to you?**

1. We offer a non-advised service. This means we cannot give you advice or a recommendation on products. We, or our introducing supplier, will assess your application and from the information provided, will detail the products relevant to your requirements. Once the key features have been explained, you must make your own choice as to which product is right for you. Once you have chosen a product, you will receive the pre-contract credit information which will detail the Terms & Conditions, the interest rate charged and details of any other fees that may apply.

## **11. Interest Rates**

1. We are a credit broker, not a lender. Rates are determined by the product and lender you choose or they can be based on your credit score. We have provided a fixed rate to the introducing supplier and the supplier has no authority to change this rate. Credit score-based rates are predetermined and linked to your individual credit rating. Typically, the higher your credit score, the lower the APR you will receive from a lender.

## **12. Commission Disclosure**

1. Our service is completely free and we do not charge a fee for providing you with any of our products. We may receive a commission from the finance provider, and we may also pay a commission to the introducing supplier. The commission is either a fixed fee or a percentage of the amount you borrow. We work with several finance providers and so the commissions we received and pay will vary from lender to lender. However, the commission we receive does not influence the interest rate you will pay as our aim is to secure finance for you at the lowest interest rate available from our panel of lenders. The amount of commission will be made available to you on written request to either Eurodrive Motor Finance or the introducing supplier.

## **13. How you can complain**

1. You can lodge a complaint with us directly by contacting us on one of the above contact details.
2. You also have the right to lodge a complaint directly with the Information Commissioner's Office (ICO).
3. The ICO are the regulator who makes sure that we use your personal information in a lawful way.
4. You can lodge a complaint with the ICO by following this link <https://ico.org.uk/concerns/> or calling the ICO on 0303 123 1113.

## **14. Policy updates**

1. This policy was last updated on 15<sup>th</sup> June 2022 and will be reviewed on at least an annual basis.