

Privacy Policy

The details set out below explain who we are, how data is collected from you, why it is being collected, how it is being used, why this may be shared and what effect this may have on you (or, if applicable, the company / organisation / institution your work with). Please do read the contents below carefully.

Who is collecting your information?

Carlease (UK) Ltd t/a CarLease UK, Car-E-Lease UK and VanLease UK (referred to as "CLUK" within this Privacy Policy) being based at Kings Business Centre, Warrington Road, Leigh, WN7 3XG are the data controller and are committed to ensuring that your privacy and personal information is protected. CLUK complies with the UK's Data Protection Law and the EU General Data Protection Regulation (GDPR). For further information please contact our data protection compliance officer using the details below:

In writing: Kings Business Centre Warrington Road Leigh WN7 3XG By Telephone – 01942 265401

By Email – mike.king@carlease.uk.com

CLUK will collect your information through our three main websites (www.carlease.uk.com www.vanlease.uk.com and www.schoolminibusleasing.uk.com) CLUK also collect information via referral partner websites. CLUK do not warrant or indemnify you for the actions or conduct of our referral partners and so you will need to review their privacy notice as necessary.

Account managers/sales personnel, administration/logistics personnel or senior management may contact you by email or by telephone to request further personal information. Unless expressly told otherwise, no third parties will be asked to collect your personal information on our behalf. If you have any concerns which relate to who is collecting your personal information, please can you contact our compliance officer for clarification.

Marketing communication - our approach

If you have chosen to provide us with the information we require for a quotation, we will use the information you provide to supply any quotation requested to you and also to communicate, in email, any contract hire offers we have to you over a period of no more than 12 months. Due to the nature of contract hire and leasing, we understand that a purchasing decision will not always be made immediately and where you request a quote there is a legitimate business interest in this flexible approach to providing details of our broking services. However, please do note that you have a right to opt-out of any communication at any time. Please do so by clicking "unsubscribe" or by emailing our compliance officer in an email headed "unsubscribe".

If you have chosen to consent to all marketing communications, we will use your information to tell you about products and services available from us which may be of interest to you. We may also use your information to tell you about products and services which we can introduce from selected businesses that we work alongside where you have consented to this. Please do note that you have a right to opt-out of any communication at any time. Please do so by clicking "unsubscribe" or by emailing our compliance officer in an email headed "unsubscribe".

In some cases, we receive confirmation when you open an email from CLUK. This will be used to monitor the effectiveness and quality of our communication.

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What information is submitted to and processed by CLUK

CLUK are a credit broker and not a lender. This means that in order to engage our broking services you will initially be asked to submit personal information about yourself and/or the company you work for in order to receive a formal quotation. For the avoidance of doubt, this includes:

- Your full name; • (If applicable) the company name;
- A telephone number;
- An email address;
- A postcode;
- The vehicle(s) you require a quotation for; and
- Any information which you voluntarily provide to CLUK when enquiring on the website.

The initial information CLUK request is collected, stored and used to generate a formal response in written and/or verbal format. For reference, our team will generally send a quotation in email format (including attachments) to the email address you provide and/or provide quotation details in a recorded telephone call. You will also be asked to confirm that you have reviewed this privacy policy and that you consent to us acting for you in the credit broking process. Failure to adhere to any of the above may result in CLUK being unable to provide services to you.

Should you wish to proceed with the formal quotation and engage our broking services, you may be asked to supply additional information to us including (but not limited to):

- Your full address (and for any addresses you have resided in over the last 5 years)
 - house number, street, postcode, city and region;
- (If applicable) the company address as per the above;
- Date of birth; • (If applicable) full director details which will replicate the information above;
- (If applicable) company number and date established;
- Home telephone number and mobile number (if not already supplied);
- (If applicable) the company landline number;
- Employment details for the previous 3 years - employer name, employer address and employer telephone number;
- Bank Details – including your bank name, account name, account number, sort code and date the account was opened;
- Income and expenditure – this is required as part of affordability reviews and will include, amongst other things, your gross annual salary, car allowance, mortgage/rent, food/drink/clothing, fuel expenditure, any loans, utility bills and other material expenditure (for example school fees/student loans);
- Business income and expenditure - this is required as part of affordability reviews which will include annual turnover, annual cost of sales and annual expenses; and
- Original documentation – as a credit broker we work alongside a number of finance companies. In some case, original driving licences, passports and bank statements are required. CLUK cannot protect against the risks involved in sending original documentation and therefore this is carried out at your own risk.

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Why CarLease UK need your information / Who CarLease UK share your information with

CLUK are committed to ensuring that your privacy is protected and that all transactions are carried out confidentially. CLUK endeavour not to collect any more personal information than is necessary to carry out our broking services; CLUK do not collect data for any other purposes. As CLUK work alongside a select number of finance companies, we have to accommodate their individual requirements and in certain cases we will be asked to procure further information from you.

The information you supply to us will only be distributed outside of CLUK where:

- You have supplied consent to do so;
- This is necessary to fulfil our contractual obligations to you for example as part of our broking services;
- There is a lawful basis to do so, for example if CLUK are subject to a legal obligation from a regulatory body;
- There is a vital interest to do so, for example if we need to supply information to protect or preserve your life;
- There is a public interest task, for example if CLUK have to carry out task which is laid down by law; or
- There is a legitimate interest for doing so, for example if there is a wider interest to society for doing so.

To fulfil our role as a credit broker, we will need to share your data with third parties who will have to use your data for their own purposes. This is a necessary part of the broker services transaction. You acknowledge and agree that we can supply your personal data with third parties in order for us to carry out our broking services. The third parties we work alongside include, but are not limited to, the following:

- Credit reference agencies – CLUK, at the date of this privacy policy, do not perform credit checks. A full explanation of credit reference agencies is set out below ;
- The selected finance company for your transaction/transactions – the CLUK team and the finance company will organise finance agreements with you. For the list of the finance companies/panel of lenders we work alongside (and their privacy policies) please access the following link (<https://www.carlease.uk.com/about-car-leasing-companies/initial-disclosure-document>);
- The supplying dealer – in some cases the CLUK team will utilise the finance company of the dealer if we do not have a direct access to that finance company. The reason for this is that the quotation you have chosen has been constructed using that finance company's pricing (which is often the cheapest price or they have terms and conditions which meet your individual or business requirements). In addition, we will share your personal data for ordering the vehicle, delivering the vehicle and for managing any complaints which may arise in the process. As CLUK are a credit broker we do not supply any vehicles to you directly and therefore use a nominated dealer network to supply your vehicle;
- Credit brokers / terms holders - in some cases the CLUK team will utilise the finance company of another credit broker. The reason for this is that the quotation you have chosen has been constructed using their pricing (which is often the cheapest or they have terms and conditions which meet your individual or business requirements). In addition, CLUK work alongside entities that provide enhanced discounts for certain car manufacturers which will result in a cheaper quotation for you. To order the vehicle with them, we will need to share your personal details.
- Insurance companies – CLUK are a passive introducer for a GAP insurance provider. If you wish to obtain details of this cover they will require personal data to complete the transaction;
- Debit card/credit card processors – in order to collect payments from you for administration fees (or similar) we will submit your personal data via an online portal; and

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- Fleet management/vehicle management suppliers – in some cases we will send your personal details to companies that can assist in delivering your new vehicle to you. As all cars are either driven or transported to you by a supplying dealer, they require certain personal data to perform their services (unless you are able to collect your vehicle directly). If you have an issue with your vehicle during the contract, you may ask CLUK to assist with the repair or resolution (which, for the avoidance of doubt, is not part of our credit broking service). We will share your personal data with the relevant repairer. If you elect to use a fleet management company, we will share your personal data with them so that they can carry out their fleet management services. At the end of the contract, a representative from the selected finance company/funder or auction house will collect your vehicle. As such we will share your personal data with them so that they can carry out these services.

Credit Reference Agencies

In considering your application our selected funder partners/finance companies will search your record at credit reference agencies. In some cases, they will add this search to your records. This application, and details contained therein, will be seen by other organisations that make searches.

Searches will also be made in respect of directors and partners of companies applying for credit. Information held about you by the credit reference 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.

If you are a joint applicant, or if you have told CLUK of some other financial association with another person, or you are a director of a company which is applying for a facility you are declaring that you are entitled to:

- disclose information about your joint applicant, fellow directors and anyone else referred to by you; and
- authorise CLUK to search, link or record information at credit reference agencies about you and anyone else referred to by you. It is of the utmost importance that the information provided to CLUK is accurate. CLUK or our funder partners will notify the fraud prevention agencies should false or inaccurate information be provided. These records will be shared with other organisations and used by CLUK and them to:
- help make decisions about credit and credit related services; and
- trace debtors, recover debt, and prevent money laundering / fraud. Fraud prevention agency records will also be shared with other organisations to help make decisions on motor and credit proposals, for you and members of your household.

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Your right to access personal information – Subject Access Request

You have a right to receive a copy of the information CLUK hold about you so that you can access your personal data and verify the lawfulness of the processing of the information we hold.

Except in certain cases, you are entitled to receive this information free of charge and CLUK must supply this to you without delay, but no longer than one month from the date of your request.

To request the information, please contact our data protection compliance officer in writing (email or letter) headed "Subject Access Request". Please note CLUK may ask for proof of identity, and other reasonable checks, before disclosing any details to you. For the avoidance of doubt, their details are:

Kings Business Centre Warrington Road Leigh WN7 3XG By
Telephone - 01942 265401
By Email - mike.king@carlease.uk.com

The information will be supplied to you in a reasonable means, for example in a PDF or CSV format depending upon the volume of information we hold. Where possible, we will accommodate any bespoke requests you have for the supply of this information.

Your right to have information erased

You have a legal right to request that CLUK erase all of the personal information we hold on you – this is referred to as "the right to be forgotten".

To request the erasure of your information, please contact our data protection compliance officer in writing (email or letter) headed "Information Erasure". For the avoidance of doubt, their details are:

Kings Business Centre Warrington Road Leigh WN7 3XG
By Telephone - 01942 265401
By Email - mike.king@carlease.uk.com

Please note that this right is not absolute and as CLUK endeavour to comply with the standards of our selected finance companies, the British Vehicle Rental and Leasing Association (BVRLA), the Financial Conduct Authority (FCA) and HMRC, there may be circumstances where we cannot remove all of the information we hold about you.

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Information Breaches

CLUK have a duty to report certain types of personal data breaches to our relevant supervising authorities within 72 hours of becoming aware and, where this is likely to affect your rights and freedoms, we must do so without undue delay. For reference, a personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. This includes breaches that are the result of both accidental and deliberate causes. It also means that a breach is more than just about losing personal data. This can include the loss of your personal information when we post this to you, or other data controllers, or in cases where we incorrectly delete your details from our files. Regardless of the severity of the breach, all breaches will be recorded in our "Information Breach Register", which is stored in a secure section of our server. In cases where there is no risk to your rights or freedoms, this may not be reported to the supervising authority, currently the Information Commissioner's Office. However, notwithstanding the severity, the breach will be added to the Information Breach Register. To enquire about any reference to you in our Information Breach Register please contact our data protection compliance officer in writing (email or letter) headed "Information Breaches".

Information complaints

CLUK, so far as is reasonably necessary, employ appropriate security measures in order to protect sensitive personal data. However, you recognise that the use of the CLUK website is entirely at your own risk. CLUK are not responsible or liable for the security of personal information transmitted via the Internet. From time to time, the CLUK website may provide links and banner advertisements to third party sites or other data controllers. Please note that CLUK are not responsible for, and have no control over, information that is submitted to or is collected by these parties. You are responsible for reviewing and accepting the privacy policies of these websites. Should you have any concerns or complaints relating to your privacy, personal information or otherwise, please contact our data protection compliance officer in writing (email or letter) headed "Information Complaint".

How CLUK use website 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. CLUK use traffic log cookies to identify which pages are being used. This helps CLUK analyse data about web page traffic and improve our website in order to tailor it to customer needs. CLUK only use this information for statistical analysis purposes and then the data is removed from the system. Overall, cookies help CLUK provide you with a better website, by enabling CLUK to monitor which pages you find useful and which you do not. A cookie in no way gives CLUK access to your computer or any information about you, other than the data you choose to share with CLUK. 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.

Revision of the CLUK Privacy Policy

Due to website, industry, regulatory and legal developments, this Privacy Policy may change from time to time. If the Privacy Policy is amended while this website remains active, CLUK will post the new Privacy Policy on the website.

CLUK reserve the right to change the Privacy Policy as per the above. However, we do welcome your views about the website and our Privacy Policy. If you would like to contact CLUK with your views, please contact our data protection compliance officer in writing (email or letter).