

Norton Group Data Protection - Privacy Policy and 'Fair Processing Notice'

The Data Protection Act and the Data Protection Bill, which enacts the General Data Protection Regulation in UK law, requires companies and individuals who process and retain information about their customers to tell the customer how the information will be used and to what purposes it will be put. The Act does not restrict itself only to information kept on a computer; it is relevant to any ordered filing system. The information below describes how your data will be processed. We will not use your personal data in any other way without first informing you.

The Norton Finance Group Limited comprises the following entities:

Norton Home Loans Limited
Norton Financial Services Limited
Norton Finance and Mortgages Limited

This Privacy Statement is observed by all entities that form part of the Norton Finance Group Limited.

Norton Finance receives, holds and processes information relating to individuals ('personal data') in accordance with the Data Protection Act 1998 (DPA98). In doing so, Norton Finance is committed to maintaining the privacy and protection of all personal data collected in pursuance of its broker and loan services. Norton Finance is further committed to ensuring that its websites are absolutely secure in their collection and use of your personal information. All entities that comprise Norton Finance are registered on the public register of data controllers maintained by the Information Commissioner.

Collection of Data

We will collect information which you provide to us when you enquire about or apply for finance, which includes information gained from either or both stages of the Norton application form. This may include certain sensitive personal data (special category data).

If your application or enquiry relates to:

- a second legal charge or unsecured loan, Norton Finance and Mortgages limited will be primarily responsible for the data which we hold about you; or,
- a first legal charge, Norton Home Loans Limited and Norton Finance and Mortgages Limited will be primarily responsible for the data which we hold about you.

Norton Financial Services Limited and Norton Home Loans Limited will provide you with lending facilities.

We may also collect data about you from our searches at credit reference agencies (see below)

Use of Data

We will use your personal data to:

- Process the application you have made by reference to lender information.
- Make, or cause searches to be made, at a credit reference agency, or agencies.
- To offer you other products which we make available.
- Exercise or defend our legal rights and/or to comply with any legal requirements.
- Provide your information to a lender for them to assess your suitability.
- Complete the credit agreement on behalf of the lender.
- Pass your information in its entirety to an alternative broker when Norton Finance cannot assist in brokering you a loan.

We may also use and disclose your personal information to:

- A lender or lenders in accordance with your application.
- Another broker if we are not able to arrange finance for you.
- Enable us to pass your details to another company in the future with a view to them offering you products or services they feel may be of interest to you.
- Permit access to your information by any regulatory authority where required by law (consent not required) and to ensure that we are complying with all regulatory requirements when processing your data.
- Other legal authorities if required by law.
- Contact you in the future to offer you products or services that we feel may be of interest to you.
- Fraud prevention agencies to prevent fraud and money laundering.

We may keep your information for several years to fulfil regulatory requirements, such as to enable us to deal with complaints. We will contact you for marketing purposes with products we feel may be of interest to you. You can change your mind about receiving marketing communications at any time by contacting us. We have a duty to keep the personal information which we hold about you up to date and accurate and secure from misuse or accidental loss or damage.

Lending Companies

All lending companies have their own individual privacy policies and customers should refer to these in respect of how they will use personal data. Lenders to whom the application is passed, will make wider use of the information than a broker. If you have received any lender documents, they should include a statement telling you what they will do with the information, or telling you where to look to find out what use they will make of it.

Both we and almost all lending companies will check the information supplied on loan or mortgage applications with data held by credit reference agencies. The lender may search on more than one occasion. Every time a search is made it is recorded by the agency and disclosed to other organisations on any later searches.

Lenders will use the information obtained in the credit reference searches to help them assess the application and they may use the result of any search in a credit scoring system.

The lender may check your details with the credit reference agency or with other agencies to satisfy itself that all the details on the application are true, and that the application has been really made by you. If it suspects information is false or inaccurate it may report it to a fraud prevention agency.

Sometimes a lender may not wish to lend. This may be for a number of reasons. The lender may think you cannot afford the loan. If it is a secured loan, your property may not be of sufficient value. A lender does not have to tell you exactly why you have been refused a loan but you can ask them for the name and address of any credit reference agency used and they will supply this information free of charge.

Nobody has a right to receive a loan.

Loans are always granted at the discretion of the lending company.

Norton Group of Companies

Credit Reference Agency Information Notice (CRAIN)

Adopted: 23rd October 2017

This document describes how the three main credit reference agencies: Callcredit, Equifax and Experian, (also called 'credit reference agencies' or 'CRAs' in this document) each use and share personal data (also called 'bureau data') they receive about you and/or your business that is part of or derived from or used in credit activity.

Please note: you shouldn't think of this document as a complete record of all the personal data each CRA may hold and process, as each has a number of different business functions running through it. To find out more about each CRA's other businesses, services and personal data processing, go to the website links provided at Section 14 below.

This document answers these questions:

1. Who are the credit reference agencies and how can I contact them?
2. What do credit reference agencies use personal data for?
3. What are the credit reference agencies' legal grounds for handling personal data?
4. What kinds of personal data do credit reference agencies use, and where do they get it?
5. Who do credit reference agencies share personal data with?
6. Where is personal data stored and sent?
7. How long is personal data kept for?
8. Do the credit reference agencies make decisions about me or profile me?
9. What can I do if I want to see the personal data held about me?
10. Do I have a 'data portability' right in connection with my bureau data?
11. What can I do if my personal data is wrong?
12. Can I object to the use of my personal data and have it deleted?
13. Can I restrict what the credit reference agencies do with my personal data?
14. Who can I complain to if I'm unhappy about the use of my personal data?

15. Where can I find out more?

You have the right to object to credit reference agencies using your personal data. Please see Section 11 to find out more.

NOTE: The information in this document will be effective from the Adopted Date set out above, except for the information in Sections 9 (data portability right), 11 and 12. These Sections provide information on new rights that will only come into effect from the 25th May 2018, which is the effective date of the General Data Protection Regulation (GDPR).

1. Who are the Credit Reference Agencies and how can I contact them?

There are three main credit reference agencies in the UK who deal with people's personal data. Each is regulated by the Financial Conduct Authority (FCA) business as a credit reference agency.

Credit Reference Agency Contact Details:

Callcredit Limited

Post: Callcredit Information Group, One Park Lane, Leeds, West Yorkshire LS3 1EP.

Web Address: <http://www.callcredit.co.uk/consumer-solutions/contact-us>

Email: consumer@callcreditgroup.com

Phone: 0330 024 7574

Equifax Limited

Post: Equifax Ltd, Customer Service Centre PO Box 10036, Leicester, LE3 4FS.

Web Address: https://www.equifax.co.uk/Contact-us/Contact_Us_Personal_Solutions.html

Email: www.equifax.co.uk/ask

Phone: 0333 321 4043 or 0800 014 2955

Experian Limited

Post: Experian, PO BOX 9000, Nottingham, NG80 7WF

Web Address: <http://www.experian.co.uk/consumer/contactus/index.html>

Email: consumer.helpservice@uk.experian.com

Phone: 0344 481 0800 or 0800 013 8888

2. What do Credit Reference Agencies use personal data for?

Credit Reference Agency Processing

Credit reference agencies receive personal data about you that's part of, derived from or used in credit activity. Different lenders and creditors will use different CRA services, and may not use all the services described here, so we recommend you also check your lender and creditor's privacy policy(s) as well as this document.

Credit Reporting and Affordability Checks

Each CRA uses the data it gathers to provide credit reporting services to its clients.

Organisations use credit reporting services to see the financial position of people and businesses. For example, a lender or creditor may check with a credit reference agency when an individual or business applies for credit, and the lender or creditor needs to make a credit decision taking into account that person or business' credit history.

Affordability checks help organisations understand whether people applying for credit or financial products (like loans) are likely to afford the repayments.

These activities help promote responsible lending, prevent people and businesses from getting into more debt than they can afford, and reduce the amount of unrecoverable debt and insolvencies.

Verifying Data like Identity, Age and Residence, and Preventing and Detecting Criminal Activity, Fraud and Money Laundering

The CRAs also use bureau data to provide verification, crime prevention and detection services to their clients, as well as fraud and anti-money-laundering services.

For example:

- When a person applies to an organisation for a product or service, the organisation might ask them to answer questions about themselves, and then check the answers against the data held by the CRAs to see if they're correct. This helps confirm the person they are dealing with is not trying to commit identity theft or any other kind of fraud.
- Where some products and services are only available to people of a certain age, organisations can check whether the person they're dealing with is eligible by searching the CRAs databases.
- If a person applies for credit, the lender or creditor might check the personal data that person gives them against the personal data held by CRAs to try and prevent fraud.
- Government and quasi-government bodies can use data held by CRAs to check whether people are entitled to certain benefits and to help recover unpaid taxes, overpaid benefits and similar debts.

Account Management

CRAs supply information, including personal data, to their clients for account management, which is the ongoing maintenance of the client organisation's relationship with its customers. This could include activities designed to support:

- Data accuracy (such as data cleansing – where bureau data can be used to clean or update lender data. This might involve checks that data is in the right format or fields, or to correct spelling errors);
- Clients' ongoing account management activities. For example, data sharing with lenders and creditors, so clients can make decisions relating to credit limit adjustments; transaction authorisations; to identify and manage the accounts of customers at risk, in early stress, in arrears, or going through a debt collection process; or to confirm that assets are connected to the right person.

Tracing and Debt Recovery

CRAs provide services that allow organisations to use bureau data to trace people who've moved. Each CRA also offers a service that allows people to be reunited with assets (like an old dormant savings account they've lost contact with).

CRAs may also use personal data to support debt recovery and debtor tracing. An example of a tracing activity could be when a person owes money and moves house without telling the creditor where they've gone. The creditor may need help finding that person to claim back what they're owed. CRAs help find missing debtors by providing creditors with updated addresses and contact details.

Screening

CRAs can use some personal data to screen people out of marketing lists. For example, where a person's financial history suggests they're unlikely to be accepted for or afford a particular product, the relevant organisation can use that data to opt out of sending them information about that product. This helps stop people receiving irrelevant marketing, and saves organisations the costs of inappropriate marketing and unsuccessful applications.

The data isn't used to identify, select and send marketing materials to potential new customers.

Statistical Analysis, Analytics and Profiling

CRAs can use and allow the use of personal data for statistical analysis and analytics purposes. For example: to create scorecards, models and variables in connection with the assessment of credit, fraud, risk; or to verify identities, to monitor and predict market trends, to allow use by lenders for refining lending and fraud strategies, and for analysis such as loss forecasting.

Database Activities

CRAs carry out certain processing activities internally which support databases effectiveness and efficiencies. For example:

- Data loading: where data supplied to the CRAs is checked for integrity, validity, consistency, quality and age help make sure it's fit for purpose. These checks pick up things like irregular dates of birth, names, addresses, account start and default dates, and gaps in status history.
- Data matching: where data supplied to the CRAs is matched to their existing databases to help make sure it's assigned to the right person, even when there are discrepancies like spelling mistakes or different versions of a person's name. CRAs use the personal data people give lenders together with data from other sources to create and confirm identities, which they use to underpin the services they provide.
- Data linking: as CRAs compile data into their databases, they create links between different pieces of data. For example, people who appear financially associated with each other may be linked together, and addresses where someone has previously lived can be linked to each other and to that person's current address.
- Systems and product testing: data may be used to help support the development and testing of new products and technologies.

Each CRA has its own processes and standards for data loading, data matching and other database processing activities.

Other uses with your Permission

From time to time CRAs may use the personal data they hold or receive about you for other purposes where you've given your consent.

Uses as Required or Permitted by Law

Your personal data may also be used for other purposes where required or permitted by law.

Other Activities

Each credit reference agency also has other lines of business not described in this document. For example, each offers its own marketing services and direct-to-consumer services. Each CRA will provide separate information as appropriate for any services that fall outside of scope of this document.

What is a Fraud Prevention Agency?

A Fraud Prevention Agency (FPA) collects, maintains and shares data on known and suspected fraudulent activity. All three credit reference agencies also act as FPAs.

Fraud Prevention Agency Processing

How data may be used by fraud prevention agencies:

FPAs may supply the data received from lenders and creditors about you, your financial associates and your business (if you have one) to other organisations (please see Section 5 for more information on these organisations). This may be used by them and the CRAs to:

- Prevent crime, fraud and money laundering by, for example, checking details provided on applications for credit and credit related or other products and services;
- Managing credit and credit related accounts or products or services;
- Cross-checking details provided on proposals and claims for all types of insurance;
- Checking details on applications for jobs or as part of employment;
- Verify your identity if you or your financial associate applies for facilities, including all types of insurance proposals and claims;
- Trace your whereabouts and recover debts that you owe;
- Conduct other checks to prevent or detect fraud;
- Undertake statistical analysis and system testing;
- Your personal data may also be used for other purposes where you've given consent or where required or permitted by law.

3. What are the Credit Reference Agencies legal grounds for handling personal data?

Legitimate Interests

The UK's data protection law allows the use of personal data where its purpose is legitimate and isn't outweighed by the interests, fundamental rights or freedoms of data subjects. The law calls this the Legitimate Interests condition for personal data processing.

The Legitimate Interests being pursued here are:

Interest Explanation

Promoting responsible lending and helping to prevent over-indebtedness.

Responsible lending means that lenders only sell products that are affordable and suitable for the borrowers' circumstances. CRAs help ensure this by sharing personal data about potential borrowers, their financial associates, where applicable, and their financial history. A comprehensive range of measures exists in the UK to underpin the balance, so the legitimate interests aren't outweighed by the interests, fundamental rights and freedoms of data subjects. Further explanation about this balance is set out below:

- Helping prevent and detect crime and fraud and anti-money laundering services and verify identity:
 - CRAs provide identity, fraud and anti-money laundering services to help clients meet legal and regulatory obligations, and to the benefit of individuals to support identity verification and support of detection/ prevention of fraud and money-laundering.
- Supporting tracing and collections:
 - CRAs provide services that support tracing and collections where there is a legitimate interest in the client conducting activity to find its customer and to recover the debt, or to reunite, or confirm an asset is connected with, the right person.
- Complying with and supporting compliance with legal and regulatory requirements:
 - CRAs have to comply with various legal and regulatory requirements. CRA services also help other organisations comply with their own legal and regulatory obligations. One example, many kinds of financial services are regulated by the Financial Conduct Authority or the Prudential Regulation Authority, who impose obligations to check that financial products are suitable for the people they are being sold to. The credit reference agencies provide data to help with those checks.

The CRAs use of this personal data is subject to an extensive framework of safeguards that help make sure that people's rights are protected. These include the information given to people about how their personal data will be used and how they can exercise their rights to obtain their personal data, have it corrected or restricted, object to it being processed, and complain if they're dissatisfied. These safeguards help sustain a fair and appropriate balance so the CRAs' activities don't override the interests, fundamental rights and freedoms of data subjects.

4. What kinds of personal data do Credit Reference agencies use and where do they get it from?

Each credit reference agency obtains and uses information from different sources, so they often hold different information and personal data from each other. However, most of the personal data they do hold falls into the categories outlined below from the sources described:

- **Information type**
- **Description**
- **Source**
- **Identifiers**

CRAs hold personal data that can be used to identify people, like their name, date of birth, and current and previous addresses.

They may also hold business data.

This personal data is included with all the other data sources. For example, names, addresses and dates of birth are attached to financial account data so it can be matched and associated with all the other data the CRA holds about the relevant person.

Data about UK postal addresses is also obtained from sources like Royal Mail.

CRA's also obtain copies of the electoral register containing the names and addresses of registered voters from local authorities across the UK in accordance with specific legislation.

CRA's also have access to public data sources on people and businesses, including from the Insolvency Service, Companies House and commercial business directories.

Lender Provided and Creditor Provided Data

CRA's receive information that includes personal data from credit applications and about the financial accounts that people hold from the organisations that maintain those accounts. This includes personal data about bank accounts, credit card accounts, mortgage accounts and other agreements that involve a credit arrangement like utilities and communications contracts (including mobile and internet). The collected data includes the name of the organisation the account is held with, the date it was opened, the account number, the amount of debt

Banks, building societies, lenders and other financial services providers supply data including personal data about peoples' financial accounts and repayments. Other credit providers, such as hire purchase companies, utilities companies, mobile phone networks, retail and mail order, and insurance companies also provide this data when they agree credit facilities with their customers.

The information can also include: outstanding payments (if any), any credit limits and the repayment history on the account, including late and missing payments.

CRA's may also receive data about financial accounts like current accounts, credit cards or loans and may receive payments information that businesses hold from the organisations who maintain those accounts.

These organisations may also provide Cifas markers when they suspect fraud. You can find out more about Cifas markers in the Fraud Prevention Indicators Section below.

Court Judgments, Decrees and Administration Orders

CRA's obtain data about court judgments that have been issued against people. This may include, for example, the name of the court, the nature of the judgment, how much money was owed, and whether the judgment has been satisfied.

The government makes court judgments and other decrees and orders are made publicly available through statutory public registers. These are maintained by Registry Trust Limited, which also supplies the data on the registers to the CRA's.

Bankruptcies, Individual Voluntary Arrangement (IVAs), Debt Relief Orders and Similar Events

CRA's obtain data about insolvency related events that happen to people and may also obtain this type of data about businesses. This includes data about bankruptcies, IVAs and debt relief

orders, and in Scotland, it includes sequestrations, trust deeds and debt arrangement schemes. This data includes the start and end dates of the relevant insolvency or arrangement.

CRAs obtain this data from The Insolvency Service, the Accountant in Bankruptcy, The Stationary Office and Northern Ireland's Department for the Economy – Insolvency Service, the London, Belfast and Edinburgh Gazettes.

Business bankruptcies data are obtained from the London, Belfast and Edinburgh Gazettes.

Fraud Prevention Indicators

The CRAs are all Fraud Prevention Agencies (FPAs) and members of Cifas (www.cifas.org.uk), an organisation that collects and shares data about suspected fraud. When an organisation believes its detected fraud or an attempted fraud, it may put a Cifas marker on the relevant person's credit file to warn other lenders this identity may have been used fraudulently. This helps to prevent any further fraud and protect innocent consumers. These fraud indicators are shared among Cifas members through the database held by Cifas.

Gone Away Information Network indicators

Some CRAs are members of the Gone Away Information Network (GAIN), a database of people with overdue outstanding debts who've moved without giving their lender a forwarding address. CRAs obtain GAIN data from lenders, and additional address data is obtained from Royal Mail. Address data from GAIN, including the persons' old addresses and any known new addresses, may be recorded on the relevant credit file.

Search Footprints

When an organisation uses a CRA to make enquiries about a particular person, the CRA keeps a record of that enquiry which appears on the person's credit file. This includes the name of the organisation, the date, and the reason they gave for making the enquiry.

CRAs generate search footprints when enquiries are made about a particular person. The organisation making the enquiry provides some of the data in the footprint (such as the reason for the enquiry).

Scores and Ratings

CRAs may use the data they receive to produce scores and ratings including: credit, affordability, risk, fraud and identity, screening, collections and insolvency scores about people and businesses, and credit ratings about people. Organisations that obtain data from CRAs may use it together with other data to provide their own scores and ratings.

Credit scores and credit ratings are produced from data like the person's credit commitments, whether they have made repayments on time, whether they've any history of insolvencies or court judgments, and how long they've lived at their current address. Each CRA has its own way of calculating credit scores, and most lenders have their own scoring systems too.

The CRAs produce their scores and ratings using the data available to them.

Similarly, other organisations create their own scores and ratings from data obtained from the CRAs as well as other sources.

Other Supplied Data

CRAs receive data from reputable commercial sources. This includes phone number data and politically exposed persons (PEPs) and sanctions data.

CRAs receive this data from reputable commercial sources as agreed from time to time.

Other Derived Data

The CRAs produce some other kinds of data themselves to manage their databases efficiently and ensure that all the relevant data about a person is on the correct credit file.

- **Address links:** when a CRA detects that a person seems to have moved house, it may create and store a link between the old and new address.
- **Aliases:** when a CRA believes that a person has changed their name, it may record the old name alongside the new one. The CRAs generate this data from the data sources available to them.
- **Financial Associations and Linked People:** when a CRA believes two or more people are financially linked with each other (for example, because they have a joint account), it may record that fact.
- **Flags and Triggers:** through analysis of other data, CRAs can add indicators to credit files. These aim to summarise particular aspects of a person's financial situation. For example, a Cifas flag protects those who've been flagged as subject to fraud, and invites additional checks as a defence against further fraud risk.

Data Provided by the Relevant People

People sometimes provide data directly to CRAs. For example, they can ask a CRA to add a supplementary statement to their credit file if they want to explain the reason for a particular entry on the file. The right to do this is explained in Section 10 below.

This data is provided directly by the relevant people.

5. Who do Credit Reference Agencies share data with?

This section describes the types of recipient each credit reference agency can share data with. Each CRA has its own access control processes in place. For example, before it shares data with any another organisation, to check that organisation's identity and, where applicable, to confirm where it is registered with regulators.

In many cases where an organisation uses CRA services, there will be information accessible, for example, from website or at point of application or service, to explain that an organisation may check your data with a credit reference agency (for things like identity authentication and fraud checking). In some cases, some organisations have the ability to compel CRAs, by law, to disclose certain data for certain purposes.

Members of the Credit Reference Agency Data Sharing Arrangements

Each organisation that shares financial data with the CRAs is also entitled to receive similar kinds of financial data contributed by other organisations. These organisations are typically banks, building societies, and other lenders, as well as other credit providers like utilities companies and mobile phone networks.

Fraud Prevention Agencies

If a CRA believes that fraud has been, or might be, committed, it may share data with fraud prevention agencies (FPAs). These FPAs collect, maintain and share data on known and suspected fraudulent activity. Some CRAs also act as FPAs.

Resellers, Distributors and Agents

CRAs sometimes use other organisations to help provide their services to clients and may provide personal data to them in connection with that purpose.

Other Organisations

Some data, where permitted in accordance with industry rules or where it's public information, can be shared with other organisations that have a legitimate use for it – ID verification services, for example.

Public Bodies, Law Enforcement and Regulators

The police and other law enforcement agencies, as well as public bodies like local and central authorities and the CRAs' regulators, can sometimes request the credit reference agencies to supply them with personal data. This can be for a range of purposes such as preventing or detecting crime, fraud, apprehending or prosecuting offenders, assessing or collecting tax, investigating complaints or assessing how well a particular industry sector is working.

Processors

The CRAs may use other organisations to perform tasks on their own behalf (for example, IT service providers and call centre providers).

Individuals

People are entitled to obtain copies of the personal data the CRAs hold about them. You can find out how to do this in Section 9 below.

6. Where is personal data stored and sent?

The three CRAs are all based in the UK and keep their main databases there. They may also have operations elsewhere inside and outside the European Economic Area (EEA), and personal data may be accessed from those locations too. In both cases, the personal data use in those locations is protected by European data protection standards.

Sometimes the CRAs will need to send or allow access to personal data from elsewhere in the world. This might be the case, for example, when a processor or client of the CRA is based overseas or uses overseas data centres.

While countries in the EEA all ensure a high standard of data protection law, some parts of the world may not provide the same level of legal protection when it comes to personal data. As a result, when a CRA does send personal data overseas it will make sure suitable safeguards are in place in accordance with European data protection requirements, to protect the data. For example, these safeguards might include:

- Sending the data to a country that's been approved by the European authorities as having a suitably high standard of data protection law. Examples include: the Isle of Man, Switzerland and Canada;
- Putting in place a contract with the recipient containing terms approved by the European authorities as providing a suitable level of protection;
- Sending the data to an organisation which is a member of a scheme that's been approved by the European authorities as providing a suitable level of protection. One example is the Privacy Shield scheme agreed between the European and US authorities. Another example is Binding Corporate Rules. If your data has been sent overseas like this, you can find out more about the safeguards used from the CRAs, whose contact details are in Section 1 above.

7. For how long is personal data retained?

Identifiers

Identification data like names and addresses are kept while there's a continuing need to keep it. This need will be assessed on a regular basis and data that's no longer needed for any purpose will be disposed of.

Financial Accounts and Repayment Data

Data about live and settled accounts is kept on credit files for six years from the date they're settled or closed. If the account is recorded as defaulted, the data is kept for six years from the date of the default.

Court Judgments, Decrees and Administration Orders

Generally, court judgments and other decrees and orders are kept on credit files for six years from the date of the judgment, decree or order. However, they can be removed if the debt is repaid within one calendar month of the original date or if the judgment is set aside or recalled by the courts.

Bankruptcies, IVAs, Debt Relief Orders and Similar Events

Data about bankruptcies, IVAs and other insolvency-related events and arrangements are usually kept on credit files for six years from the date they begin. This period is extended if they last longer than six years. Some data, such as a bankruptcy restrictions order, can also remain on the credit file for longer than six years.

Although the start of these events is automatically reported to the CRAs, the end (such as a discharge from bankruptcy or completion of an IVA) might not be. This is why people are advised to contact the CRAs when this happens to make sure their credit files are updated accordingly.

Search Footprints

The CRAs keep search footprints for different lengths of time. Experian and Equifax keep most search footprints for one year from the date of the search, although they keep debt collection searches for up to two years. Callcredit keeps search footprints for two years from the date of the search.

Scores and Ratings

CRA's may keep credit scores and credit ratings for as long as they keep a credit file about the relevant person.

Derived or Created Data

CRA's also create data, and links and matches between data. For example, CRA's keep address links and aliases for as long as they're considered relevant for credit referencing purposes. Links between people are kept on credit files for as long as the CRA believes those individuals continue to be financially connected. When two people stop being financially connected, either party can write to the CRA and ask for the link to be removed. The CRA will then follow a process to check the people are no longer associated with each other.

Other Data

Other third party supplied data such as politically exposed persons (PEPs), sanctions data and mortality data will be stored for a period determined by criteria such as the agreed contractual terms.

Archived Data

CRA's may hold data in an archived form for longer than the periods described above, for things like research and development, analytics and analysis, (including refining lending and fraud strategies, scorecard development and other analysis such as loss forecasting), for audit purposes, and as appropriate for establishment, exercise or defence or legal claims. The criteria used to determine the storage period will include the legal limitation of liability period, agreed contractual provisions, applicable regulatory requirements and industry standards.

8. Do the Credit Reference Agencies make decisions about me or profile me?

Lending Decisions

CRA's don't tell a lender if it should offer you credit – this is for the lender to decide. Credit reference agencies provide data and analytics that help lenders make decisions about lending. The scoring tools and data CRA's provide may profile you, and are often a valuable tool in the lender's overall processes and with the criteria they use to make their decisions. A lender's own data, knowledge, processes and practices will also generally play a significant role in that lender's business decisions - and lender decisions will always remain for lenders to make.

The same analytics from a CRA may lead to different decisions from different lenders, as they can place differing importance on some factors than others. That's why you may receive a "yes" from one lender, but a "no" from another.

The data CRA's provide is just one of the things that a lender might take into account when they make a lending decision. The lender might also take into account data provided by the person applying for credit, as well as any other data available to the lender from other sources. Each lender will have its own criteria for deciding whether or not to lend.

Scores and Ratings

When requested, CRAs do use the data they obtain to produce credit, risk, fraud, identity, affordability, screening, collection and/or insolvency scores and credit ratings; these are explained in Section 4 above. CRAs don't tell a lender if it should offer you credit – this is for the lender to decide. Each credit reference agency, and each lender, will have its own criteria for how to calculate a credit score, but the following factors will usually have an effect:

- How long the person has lived at their address.
- The number and type of credit agreements and how they use those credit products.
- Whether the person has been late making payments.
- Whether the person has had any court judgments made against them.
- Whether the person has been bankrupt or had an IVA or other form of debt-related arrangement.

The CRAs may provide or make available further information on profiling where necessary from time to time.

9. What can I do if I want to see the personal data held about me? Do I have a 'Portability right' in connection with my Bureau data?

Data Access Right

You have a right to find out what personal data the credit reference agencies hold about you. Each CRA provides more information about access rights on their websites.

Data Portability Right

New data protection legislation also contains a right to data portability that may give consumers a right in some data processing contexts, to receive their personal data in a portable format when it's processed on certain grounds, such as consent. This is not a right that will apply to bureau data, because this data is processed on the grounds of legitimate interests. To find out more about legitimate interests please go to Section 3 above.

NOTE: The information in this document will be effective from the Adopted Date set out on the first page, except for the information in this Section 9 (data portability right), and in Sections 11 and 12. These Sections provide information on new rights that will only come into effect from the 25th May 2018, which is the effective date of the General Data Protection Regulation (GDPR).

Callcredit:

To get online information: <http://www.callcredit.co.uk/consumer-solutions/contact-us>

To make a request by post: Callcredit Limited, Consumer Services Team, PO Box 491, Leeds, LS3 1WZ

Equifax:

To get online information: <https://www.equifax.co.uk>

To make a request by post: Equifax Ltd, Customer Service Centre, PO Box 10036, Leicester, LE3 4FS.

Experian:

To get online information: <http://www.experian.co.uk/consumer/contact-us/index.html>

To make a request by post: Customer Support Centre, Experian Ltd, PO BOX 9000, Nottingham, NG80 7WF

10. What can I do if my personal data is wrong?

When the CRAs receive personal data, they perform lots of checks on it to try and detect any defects or mistakes. Ultimately, though, the credit reference agencies rely on the suppliers to provide accurate data.

If you think that any personal data a CRA holds about you is wrong or incomplete, you have the right to challenge it. It's worth knowing that the CRA won't have the right to change the data without permission from the organisation that supplied it, so the credit reference agency will need to take reasonable steps to check the data first, such as asking the organisation that supplied it to check and confirm its accuracy.

If the data does turn out to be wrong, the CRA will update its records accordingly. If the CRA still believes the data is correct after completing their checks, they'll continue to hold and keep it; although, you can ask them to add a note to your file indicating that you disagree or providing an explanation of the circumstances. If you'd like to do this, you should contact the relevant CRA using their contact details in section 1 above.

11. Can I object to the use of my personal data and have it deleted?

This section helps you understand how to use your data protection rights to object to your personal data being used and how to ask for it to be deleted, in connection with bureau data. To understand these rights and how they apply to the processing of bureau data, it's important to know that the CRAs hold and process personal information in bureau data under the Legitimate Interests ground for processing (see section 3 above for more information about this), and don't rely on consent for this processing.

You have the right to lodge an objection about the processing of your personal data to a CRA. If you want to do this, you should contact the relevant CRA using the contact details set out in section 1 above.

Whilst you have complete freedom to contact a CRA with your objection at any time, you should know that under the General Data Protection Regulation, your right to object doesn't automatically lead to a requirement for processing to stop, or for personal data to be deleted, in all cases.

Please note: due to the importance of the credit referencing industry to the UK's financial system, and the important purposes the personal data is needed for (like supporting responsible lending, and preventing over indebtedness, fraud and money laundering), it will be very rare that the CRAs do not have compelling, overriding grounds to carry on using the personal data following an objection. In many cases, it won't be appropriate for the CRAs to restrict or to stop processing or delete bureau data, for example, where the result would be to hide a poor credit history that could enable a person or organisation to get credit they otherwise wouldn't be eligible for.

NOTE: The information in this document will be effective from the Adopted Date set out on the first page, except for the information in Sections 9, (data portability right), this Section 11 and in Section 12. These Sections provide information on new rights that

will only come into effect from the 25th May 2018, which is the effective date of the General Data Protection Regulation (GDPR).

12. Can I restrict what the Credit Reference Agencies do with my data?

In some circumstances, you can ask credit reference agencies to restrict how they use your personal data. Your rights are set out at Article 18 of the GDPR. You can find the contact details for each CRA in section 1 above.

This is not an absolute right, and your personal data may still be processed where certain grounds exist. This is:

- With your consent;
- For the establishment, exercise, or defence of legal claims;
- For the protection of the rights of another natural or legal person; for reasons of important public interest.

Only one of these grounds needs to be demonstrated to continue data processing.

The CRAs will consider and respond to requests they receive, including assessing the applicability of these exemptions.

Please note that given the importance of complete and accurate credit records, for purposes including for responsible lending, it will usually be appropriate to continue processing credit report data – in particular, to protect the rights of another natural or legal person, or because it's an important public interest of the union or member state.

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13. Who can I complain to if I'm unhappy about the use of my information?

Each credit reference agency tries to ensure they deliver the best customer service levels, but if you're not happy you should contact them so they can investigate your concerns.

If you're unhappy with how the CRA has investigated your complaint, you have the right to refer it to the Financial Ombudsman Service (Ombudsman) for free. The Ombudsman is an independent public body that aims to resolve disputes between consumers and businesses like CRAs. You can contact them by:

1. **Phone:** 0300 123 9 123 (or from outside the UK on +44 20 7964 1000)
2. **Email:** complaint.info@financial-ombudsman.org.uk
3. **Post:** Financial Ombudsman Service, Exchange Tower London E14 9SR
4. **Website:** www.financial-ombudsman.org.uk

You can also refer your concerns to the Information Commissioner's Office (or ICO), the body that regulates the handling of personal data in the UK. You can contact them by:

1. **Phone:** 0303 123 1113

2. **Post:** Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF
3. **Website:** www.ico.org.uk

Credit Reference Agency Contact Details

Callcredit Limited

Post: Callcredit Information Group, One Park Lane, Leeds, West Yorkshire LS3 1EP

Email: customer.relations@callcreditgroup.com

Phone: 0330 024 7574

Equifax Limited

Post: Equifax Ltd, PO Box 10036, Leicester LE3 4FS

Email: complaints@equifax.com

Phone: 0333 321 4043 or 0800 014 2955

Experian Limited

Post: Experian, PO BOX 8000, Nottingham, NG80 7WF

Email: complaints@uk.experian.com

Phone: 0344 481 0800 or 0800 013 8888

14. Where can I find out more?

The work credit reference agencies do is very complex, and this document is intended to provide only a concise overview of the key points. More information about each CRA and what it does with personal data is available at the following locations:

Callcredit:

<http://www.callcredit.co.uk/consumer-solutions>

Equifax:

<https://www.equifax.co.uk/index.html>

Experian:

<https://www.experian.co.uk/>

The Information Commissioner's Office also publishes advice and information for consumers in its Credit Explained leaflet, available at:

<https://ico.org.uk/media/for-the-public/documents/1282/credit-explained-dp-guidance.pdf>

Callcredit

Callcredit Information Group

One Park Lane

Leeds

West Yorkshire

LS3 1EP

Experian

Customer Support Centre
PO Box 8000
Nottingham
NG80 7WF

Equifax Ltd

Customer Service Centre
PO Box 10036
Leicester
LE3 4FS

All lending companies use one or more of these agencies. Credit reference agencies keep a wide range of information. This includes information from the electoral roll (sometimes known as the voters roll) and records of most county court judgements and bankruptcies. They also retain information relating to previous and existing credit and a record of searches made against the file. The lenders share information through the agencies providing a history of how punctually payments are being made or have been made. Loan information is usually held on file for 6 years. Details of the voters roll may be held for much longer. Information about credit searches is kept for up to two years.

Other Agencies

Fraud Prevention Cifas

Reports relating to fraud and fraud avoidance are also available to most lenders - these contain information indicating that fraud, or attempted fraud, has been notified by a lender. The information might not directly relate to you, it might relate to someone who has tried to impersonate you. Data available to members of Cifas may also be used to help make decisions on motor, household, credit, life and other insurance proposals for you and members of your household.

If false or inaccurate information is provided and fraud is identified, details will be passed to fraud prevention agencies.

Law enforcement agencies may access and use this information.

We, and other organisations, may also access and use this information to prevent fraud and money laundering, for example, when:

- Checking details on applications for credit and credit related or other facilities;
- Managing credit and credit related accounts or facilities;
- Recovering debt;
- Checking details on proposals and claims for all types of insurance;
- Checking details of job applicants and employees.

Please contact the Compliance Department at:

Norton Finance, Norton House, Mansfield Road, Rotherham, South Yorkshire S60 2DR

Or

01709 518518, if you want to receive details of the relevant fraud prevention agencies.

The proposed lender and other organisations may access and use from other countries the information recorded by fraud prevention agencies.

CML Repossession Register

The Council of Mortgage Lenders Repossession Register is available through the main credit reference agencies. If you have had a property repossessed or have given it up voluntarily this will show on the register.

GAIN

A file may also show a "gone away" marker indicating that a member of the "Gone Away Information Network" has reported that they cannot trace a customer who is in arrears with payments. Alternatively, the marker may indicate a new address which the "gone away" has been traced to.

HUNTER

Files in this register contain detailed information on applications made and loans given. It is aimed at tracing fraudsters who use different combinations of information to obtain credit dishonestly. It checks and counter checks information given on application forms.

If your broker or lender uses any of the above agencies they will be able to confirm their contact addresses. CIFAS information is intended to warn lenders and act as a protection for innocent customers.

Access to your Data

You are able to see what information we hold about you. You can ask us for a copy at anytime. We will also tell you where the information was obtained. We will not charge you for this, unless the request is deemed to be 'excessive or manifestly unfounded'. We will reply within 1 month of your request.

If you wish to see the information contained on a credit reference agency file you can do so by writing to the relevant agency. The agency must respond within 7 working days. There is a small fee of £2 required. If your credit reference file contains information about other people with whom you have no financial connection or if it contains information which is incorrect you can ask for the entry to be corrected, removed, or have a note put on the file explaining why you think the information is wrong. The agency will not remove correct information.

The Information Commissioner provides a useful leaflet which explains how to request changes to your credit reference file. The easy to read leaflet includes examples of letters and details of various actions you may take to amend a file. You can obtain more information about the Information Commissioner and his role from their website: www.ico.org.uk.

Information is also available at www.dataprotection.gov.uk

Should you wish to obtain a copy of the personal data we hold on you please write to the Compliance Department, Norton Finance, Central Processing Office, Norton House, Mansfield Road, Rotherham, South Yorkshire S60 2DR. As soon as we are satisfied as to your identity we will send you, within 1 month, a copy of all the data we hold concerning you. Please contact us at the same address if you have any reason to believe the data we hold on you is inaccurate.

Cookies

Like many websites, when you visit this website we may issue a 'cookie' or unique code that

allows us to identify your computer. We use the cookie to note the different areas of this website recently accessed through your computer in order that we may monitor which pages of the site are of most interest to you. We will use the information collected in this way to tell you about services or products, which might be of interest to you when you make further visits to this website.

Call Recording

Calls to our offices may be recorded; this is for our protection and yours. Calls are used for training and monitoring purposes and may be used in the unlikely event of a complaint.

Changes to this Data Protection Policy

We may edit or amend this Data Protection Policy from time to time. If we make any substantial changes in the way we use your personal information we will notify you by posting a prominent notice on the home page of our website. Norton Finance shall collect and process all personal data in respect of its data subjects in line with the data protection principles.

Contacting Us

If you have any questions about our Data Protection Policy, the Terms of Use or any other aspect of this website please contact us at:

Norton Finance Group
Norton House
Mansfield Road
Rotherham
South Yorkshire
S60 2DR