

How we use your information notice

This notice explains how Newgate Motoring Solutions Limited (referred to in this notice as **Newgate, we, us or our**) collects and uses information about existing, former and prospective customers of its credit brokering services.

This notice covers the following:

- How to contact us;
- What personal data is;
- How we collect your personal data;
- The types of personal data we collect;
- How we use your personal data;
- The legal basis for processing your personal data;
- What will happen if you do not provide the information we request;
- How to share your personal data;
- When do we transfer your information overseas;
- How long do we keep personal data;
- Your rights in relation to your personal data; and
- How to make complaints in relation to your personal data.

The table at the end of this notice provides an overview of the data that we collect, the purposes for which we use that data, the legal basis which permits us to use your information and the rights that you have in relation to your information.

This notice does not form part of any contract to provide services. We keep this privacy notice up to date, so if there are any changes to the way in which your personal information is used this privacy notice will be updated and we will notify you of the changes.

Contact details

Our contact details are as follows:

Address: Newgate Motoring Solutions Ltd., Suite One, Bonnington Bond, 2 Anderson Place, Edinburgh EH6 5NP

Telephone: Freephone 08000 324 900

What is personal data?

Personal data is any information that tells us something about you. This could include information such as your name, contact details or date of birth.

How do we collect personal information?

We collect personal information about you from various sources including:

- from you when you contact us directly by telephone, email or letter;
- when you visit our website and complete our simple quote form;
- when we contact you during our relationship with you.

What information do we collect?

We collect the following categories of information about you:

- Personal contact details such as name, title, address, telephone number and personal email addresses;
- Date of birth;
- Gender;
- Religious denomination where you have made this public;
- Copy of your identity documents, for example your driving licence; and
- Financial information about you including salary or stipend and expenditure.

How do we use your information?

We use your information for the following purposes:

- to operate our credit brokering service and administer the facilities provided by us to our customers;

- to assess the suitability of our credit brokering service and facilities for our customers;
- to develop, improve and market our services; and
- for the prevention of fraud and money laundering.

What is the legal basis that permits us to use your information?

Under data protection legislation we are only permitted to use your personal information if we have a legal basis for doing so as set out in the data protection legislation. We rely on the following legal bases to use your information:

- Where we need information to perform the contract we have entered into with you.
- Where we need to comply with a legal obligation (for example when carrying out identity checks for anti-money laundering purposes).
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

The table at the end of this notice provides more detail about the information that we use, the legal basis that we rely on in each case and your rights.

Some information is classified as “special” data under data protection legislation. This includes information relating to health, racial or ethnic origin, religious beliefs or political opinions, sexual orientation and trade union membership. This information is more sensitive and we need to have further justifications for collecting, storing and using this type of personal information. There are also additional restrictions on the circumstances in which we are permitted to collect and use criminal conviction data. We may process special categories of personal information and criminal conviction information in the following circumstances:

- In limited circumstances with your explicit consent, in which case we will explain the purpose for which the information will be used at the point where you provide us with the information or we request it;
- Where you have made the information publicly available.

What happens if you do not provide information that we request?

We need some of your personal information in order to perform our contract with you. For example, we need your personal and financial information in order to introduce you to one of our selected prospective finance lenders. We also need some information so that we can comply with our legal obligations. For example, we need information about your identity to satisfy our money laundering obligations.

Where information is needed for these purposes if you do not provide it we will not be able to perform our contract with you and may not be able to offer our credit brokering services or continue with our relationship. We explain when this is the case at the point where we collect information from you.

How do we share your information?

We share your personal information in the following ways:

- During introduction to one of our selected third party finance lenders;
- When we use third parties who provide services to use, such as IT providers or mailing agencies.

Where we share your personal information with third parties we ensure that we have appropriate measures in place to safeguard your personal information and to ensure that it is solely used for legitimate purposes in line with this privacy notice.

How do we keep your information secure?

We use a secure customer relationship system to keep your details safe. We keep hard copies of information in our locked office.

We will ensure access to personal information is restricted to employees on a need to know basis.

When do we transfer your information overseas?

One of our third party suppliers, who provides services to us, uses Amazon Web Services to store your personal information in the United States of America, where data protection laws do not offer the same level of protection as in Europe. Amazon Web Services is signed up to Privacy Shield, which is a US certification regime, which ensures adequate protection for your personal information. You can find details of the Privacy Shield here:

<https://www.privacyshield.gov/welcome>

For how long do we keep your information?

As a general rule we keep your personal data for the duration of your relationship with us and for a period after the relationship ends so that if you need to come back to us in the future we have details of your previous transactions. Where we have statutory obligations to keep personal data for a longer period or where we may need your information for a longer period in case of a legal claim, then the retention period may be longer.

Your rights in relation to your information

You have a number of rights in relation to your personal information, these include the right to:

- be informed about how we use your personal information;
- obtain access to your personal information that we hold;
- request that your personal information is corrected if you believe it is incorrect, incomplete or inaccurate;
- request that we erase your personal information in the following circumstances:
 - if Newgate is continuing to process personal data beyond the period when it is necessary to do so for the purpose for which it was originally collected;
 - if Newgate is relying on consent as the legal basis for processing and you withdraw consent;
 - if Newgate is relying on legitimate interest as the legal basis for processing and you object to this processing and there is

no overriding compelling ground which enables us to continue with the processing;

- if the personal data has been processed unlawfully (i.e. in breach of the requirements of the data protection legislation); or
- if it is necessary to delete the personal data to comply with a legal obligation;
- ask us to restrict our data processing activities where you consider that:
 - personal information is inaccurate;
 - our processing of your personal information is unlawful;
 - where we no longer need the personal information but you require us to keep it to enable you to establish, exercise or defend a legal claim;
 - where you have raised an objection to our use of your personal information;
- request a copy of certain personal information that you have provided to us in a commonly used electronic format. This right relates to personal information that you have provided to us that we need in order to perform our agreement with you and personal information where we are relying on consent to process your personal information;
- object to our processing of your personal information where we are relying on legitimate interests or exercise of a public interest task to make the processing lawful. If you raise an objection we will carry out an assessment to determine whether we have an overriding legitimate ground which entitles us to continue to process your personal information;
- not be subject to automated decisions which produce legal effects or which could have a similarly significant effect on you.

If you would like to exercise any of your rights or find out more, please contact Nigel Williams. The table at the end of this notice provides more detail about the information that we use, the legal basis that we rely on in each case and your rights.

Complaints

If you have any complaints about the way we use your personal information please contact Nigel Williams, who will try to resolve the issue. If we cannot resolve your complaint, you have the right to complain to the data protection authority in your country (the Information Commissioner in the UK).

Purpose	Data used	Legal basis	Which rights apply?*
To operate our credit brokering service and administer our relationship with you	Contact details, financial information, identity information	Contractual necessity	The generally applicable rights plus the right to data portability
To assess the suitability of our credit brokering service for our customers	Contact details and financial information	Legitimate interests. It is in both Newgate's and its customers' interest to ensure it offers appropriate credit brokering services to its customers.	The generally applicable rights plus the right to object
To develop, improve and market our services	Personal contact details, information about transaction history	Legitimate interests. It is in Newgate's interest to undertake this processing to improve the overall quality of its services. Customers will ultimately benefit as the service may be enhanced.	The generally applicable rights plus the right to object
For the prevention of fraud and money laundering	Identity information, transaction information	Legitimate interests. It is in our interests and the interests of our customers to prevent and detect fraudulent transactions.	The generally applicable rights plus the right to object

*The following generally applicable rights always apply: right to be informed, right of access, right to rectification, right to erasure, right to restriction and rights in relation to automated decision making. For more detail about your rights and how to exercise them please see the section above, entitled 'Your rights in relation to your information'.