

## CRED PRIVACY POLICY

### Consent to installation of the App

Under data protection laws, we are required to provide you with certain information about who we are, how we process your personal data and for what purposes, and your rights in relation to your personal data. This information is provided in this policy and it is important that you read this information.

Before installation of this App, please indicate your consent to our processing of your personal data (including your name, contact details, financial and device information) as described in the policy.

By clicking I Agree at the end of this policy screen, I consent to the installation of the App for the purposes of applying for credit.

Please exit and delete the app if you do not consent to this Privacy Policy.

### How you can withdraw consent

Once you provide consent by selecting "YES", you may change your mind and withdraw consent at any time by contacting us by phoning 03330 030085 or emailing [help@getcred.co.uk](mailto:help@getcred.co.uk) but that will not affect the lawfulness of any processing carried out before you withdraw your consent.

### Introduction

This policy (together with your consumer credit agreement as sent to you by email where appropriate, together our **Terms of Use**) applies to your use of:

- Cred mobile application software (**App**) available through Apple store or Google Play store. Once you have downloaded or streamed a copy of the App onto your mobile telephone or handheld device (**Device**).
- Any of the services accessible through the App (**Services**).

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. This App is not intended for anyone under the age of 18 and we do not knowingly collect data relating to children. Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

You can download a pdf version of the policy here: [www.getcred.co.uk/privacypolicy](http://www.getcred.co.uk/privacypolicy).

### Important information and who we are

Cred Originations Limited t/a Cred is the controller and is responsible for your personal data (collectively referred to as Cred, "we", "us" or "our" in this policy).

We have appointed a data protection officer (**DPO**). If you have any questions about this privacy policy, please contact them using the details set out below.

### Contact details

Our full details are:

- Full name of legal entity: Cred Originations Limited

- Name or title of DPO: James Hubbard
- Email address: jhubbard@getcred.co.uk
- Postal address: Glasshouse, Alderley Park, Nether Alderley, Macclesfield, SK10 4ZE
- Telephone number: 03330 030085

You have the right to make a complaint at any time to the Information Commissioner's Office (**ICO**), the UK regulator for data protection issues.

### **Changes to the privacy policy and your duty to inform us of changes**

We keep our privacy policy under regular review.

This version was last updated on 11.06.24. It may change and if it does, these changes will be posted on this page and, where appropriate, notified to you by SMS **OR** by email **OR** when you next start the App. The new policy may be displayed on-screen and you may be required to read and accept the changes to continue your use of the App or the Services.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during our relationship with you.

### **Third party links**

Our app may, from time to time, contain links to and from the websites of our partner networks and affiliates. Please note that these websites and any services that may be accessible through them have their own privacy policies and that we do not accept any responsibility or liability for these policies or for any personal data that may be collected through these websites or services, such as Contact Data. Please check these policies before you submit any personal data to these websites or use these services.

### **The data we collect about you**

We may collect, use, store and transfer different kinds of personal data about you as follows:

- Identity Data.
- Contact Data.
- Financial Data.
- Transaction Data.
- Content Data.
- Profile Data.
- Usage Data.
- Marketing and Communications Data.

We explain these categories of data further within this policy.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific App feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences. If however, we believe that you may be vulnerable for any reason, we may record that on your account information to ensure that you get the extra protection you need.

## How is your personal data collected?

We will collect and process the following data about you:

- **Information you give us.** This is information (including Identity, Contact, Financial, and Marketing and Communications Data) you consent to giving us about you by filling in forms on the App Site and the Services Sites (together **Our Sites**), or by corresponding with us (for example, by email or chat). It includes information you provide when you register to use the App Site, download or register an App, subscribe to any of our Services, search for an App or Service, make an in-App transaction, enter a competition, promotion or survey and when you report a problem with an App, our Services, or any of Our Sites. If you contact us, we will keep a record of that correspondence.
- **Information we receive from other sources including third parties and publicly available sources.** We will receive personal data about you from various third parties as set out below:
  - Device Data from the following parties:
    - analytics providers such as Google based outside the UK;
    - search information providers such as TransUnion and Equifax based inside the UK.
  - Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as TransUnion, Equifax, Acquired, Loqate based inside the UK and EU
  - Identity and Contact Data from credit brokers or aggregators such as Monevo based inside the UK;
  - Identity and Contact Data from publicly available sources the electoral register based inside the UK; and
- **Unique application numbers.** When you want to install or uninstall a Service containing a unique application number or when such a Service searches for automatic updates, that number and information about your installation, for example, the type of operating system, may be sent to us.

## How we use your personal data

We will only use your personal data when the law allows us to do so. Most commonly we will use your personal data in the following circumstances:

- Where you have consented before the processing.
- Where we need to perform a contract we are about to enter or have entered with you.
- 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.
- Where we need to comply with a legal or regulatory obligation.

We will only send you direct marketing communications by email or text if we have your consent. You have the right to withdraw that consent at any time by contacting us or selecting relevant marketing settings in the app.

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

**Purposes for which we will use your personal data**

Purpose/activity	Type of data	Lawful basis for processing
To install the App and register you as a new App user	Identity Contact Financial Device	Your consent
To process in-App transactions and deliver Services including managing payments and collecting money owed to us	Identity Contact Financial Transaction Device Marketing and Communications	Your consent Performance of a contract with you Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you including notifying you of changes to the App or any Services	Identity Contact Financial Profile Marketing and Communications	Your consent Performance of a contract with you Necessary for our legitimate interests (to keep records updated and to analyse how customers use our products/ Services) Necessary to comply with legal obligations (to inform you of any changes to our terms and conditions)
To enable you to participate in a prize draw, competition or complete a survey	Identity Contact Device Profile Marketing and Communications	Your consent Performance of a contract with you Necessary for our legitimate interests (to analyse how customers use our products/Services and to develop them and grow our business)

To administer and protect our business and this App including troubleshooting, data analysis and system testing	Identity Contact Device	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security)
To deliver content and advertisements to you  To make recommendations to you about goods or services which may interest you  To measure and analyse the effectiveness of the advertising we serve you  To monitor trends so we can improve the App	Identity Contact Device Content Profile Usage Marketing and Communications	Consent  Necessary for our legitimate interests (to develop our products/Services and grow our business)
To share your information with our partners and service providers	Identity Contact Financial Transaction	Performance of a contract with you

## Credit Reference Agencies

If you request a personalised rate for one of our products, we will share your personal data with credit reference agencies (CRAs) and our service provider Monevo and conduct 'soft' credit searches to assess your credit rating. These soft searches will appear on your file as carried out by Cred and Monevo.

While the CRAs will record these searches, other lenders will not see them, and they will not impact your credit score.

The soft searches will also include a soft credit search of anyone with whom you have financial ties (such as a joint current account or mortgage). This individual is known as a 'financial associate'. Beyond using your financial associate's data for decision-making purposes, we will not use their data for any other reason.

However, the soft searches will also appear on their credit file, so you should inform them before requesting a quote.

CRAs link your records together, and these links will remain on both your and your financial associate's files until you or your partner successfully request that the CRAs break the link.

The soft searches will give us an overall view of your financial health, including your credit score, but not your full credit report. This helps us determine the likelihood of your application being successful and the interest rate we might offer.

Only when you accept our quote will we perform a full 'hard' credit report search. CRAs will provide us with public information (including electoral register data), as well as credit, financial situation, financial history, and fraud prevention information about you.

We will use your credit file information to:

Assess your creditworthiness and affordability for the product you want

Verify the accuracy of the information you have provided

Prevent criminal activity, fraud, and money laundering

Manage your account

Trace and recover debts

Ensure any offers provided to you are appropriate to your circumstances

We will continue to share your personal data with CRAs as long as you are a customer. We will also inform CRAs about your settled accounts. If you borrow and do not repay in full and on time, CRAs will record the outstanding debt and may provide this information to other organizations, including financial institutions that offer similar products to Cred.

As a general rule, we will give you at least 28 days' notice if we decide to file a default on your credit reference file. However, we may not always provide notice beforehand, such as when we plan to take court action.

Additionally:

We may conduct searches with CRAs to verify any identity and bank account details you provide (for example, when linking a bank account to your savings account). This may result in a record of this check being added to your credit file.

We may use data from CRAs to supplement data you've provided for the purposes outlined below in "Automated Decision Making and Profiling" and to help us understand you better, such as whether you might be interested in other Cred products.

The identities of the CRAs, their roles as fraud prevention agencies, the data they hold, how they use and share personal data, data retention periods, and your data protection rights with the CRAs are explained in the Credit Reference Agency Information Notice (CRAIN), available from each of the three CRAs and available on Cred website.

## **Disclosures of your personal data**

When you consent to providing us with your personal data, we will also ask you for your consent to share your personal data with the third parties set out below for the purposes set out in the table *Purposes for which we will use your personal data*:

- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

## **International transfers**

Some of our third parties are based outside the UK so their processing of your personal data will involve a transfer of data outside the UK.

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, we may use specific contracts approved by the UK which give personal data the same protection it has in the UK.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

## **Data security**

All information you provide to us is stored on our secure servers. Any payment transactions carried out by us or our chosen third-party provider of payment processing services will be encrypted using Secured Sockets Layer technology. Where we have given you (or where you have chosen) a password that enables you to access certain parts of Our Sites, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Once we have received your information, we will use strict procedures and security features to try to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way.

We will collect and store personal data on your Device using application data caches and browser web storage (including HTML5) and other technology.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator when we are legally required to do so.

## **Data retention**

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request by contacting us.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for regulatory and tax purposes.

In some circumstances you can ask us to delete your data: see *Your legal rights* below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## **Your legal rights**

Under certain circumstances you have the following rights under data protection laws in relation to your personal data.

Please read below to find out more about these rights:

You also have the right to ask us not to continue to process your personal data for marketing purposes.

You can exercise any of these rights at any time by contacting us at [help@getcred.co.uk](mailto:help@getcred.co.uk)

## **Glossary**

### **Lawful basis**

**Consent** means processing your personal data where you have signified your agreement by a statement or clear opt-in to processing for a specific purpose. Consent will only be valid if it is a freely given, specific,

informed and unambiguous indication of what you want. You can withdraw your consent at any time by contacting us.

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal obligation** means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

### Third parties

Service providers acting as processors based in UK and EU who provide IT and system administration services and credit reference services.

Professional advisers including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.

HM Revenue and Customs, regulators and other authorities based in the UK who require reporting of processing activities in certain circumstances.

### Your legal rights

You have the right to:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.



- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
  - (a) if you want us to establish the data's accuracy;
  - (b) where our use of the data is unlawful but you do not want us to erase it;
  - (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
  - (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the copy** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you. You can request this data through the app through "Request my data" button when you are logged in.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

#### **Description of categories of personal data**

- **Identity Data:** first name, last name, maiden name, username or similar identifier, marital status, title, date of birth, gender.
- **Contact Data:** billing address, delivery address, email address and telephone numbers.
- **Financial Data:** bank account and payment card details.
- **Transaction Data:** includes details about payments to and from you and details of in-App transactions.
- **Device Data:** includes the type of mobile device you use, a unique device identifier (for example, your Device's IMEI number, the MAC address of the Device's wireless network interface, or the mobile phone number used by the Device), mobile network information, your mobile operating system, the type of mobile browser you use, time zone setting.
- **Content Data:** includes information stored on your Device, including login information, transaction data and monthly account statements.
- **Profile Data:** includes your username and password, in-App transaction history, preferences, feedback and survey responses.

- **Usage Data:** includes details of your use of any of our Apps or your visits to any of Our Sites including, but not limited to, traffic data and other communication data, whether this is required for our own billing purposes or otherwise.
- **Marketing and Communication Data:** includes your preferences in receiving marketing from us and our third parties and your communication preferences.