

## **PRIVACY DECLARATION**

In this Privacy Declaration, unless the context otherwise requires:

**We, us, our** means STB Leasing Limited and/or RentSmart Limited, and any person to whom any of their respective rights and/or duties in connection with this Agreement are transferred.

**Group** means any company within STB Leasing Limited's group of companies and/or any company within RentSmart Limited's group of companies

More information on RentSmart Limited can be found at [www.rentsmart.co.uk](http://www.rentsmart.co.uk)

More information on STB Leasing Limited can be found at [www.securetrustbank.com](http://www.securetrustbank.com)

## **THE DATA PROTECTION ACT 1998 (THE "ACT")**

The Act puts obligations on users of personal information and, under the Act, you are entitled to know how we intend to use any information you provide. Organisations must lodge a notification with the Information Commissioner describing the purposes for which they process personal information. The details are publicly available on the Information Commissioner's website ([www.ico.gov.uk](http://www.ico.gov.uk)) or from the Information Commissioner's office at Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF. (Tel 01625 545745. Fax 01625 524510).

Under the Act you have the right of access to your personal data. We may charge a fee of £10 for this service. If anything is inaccurate or incorrect, please let us know and we will correct it

## **HOW WE USE YOUR INFORMATION**

### **Administration**

Our main use of your information is to administer your lease agreement with us. To comply with money laundering regulations, there are times when we need to confirm the name and address of our customers. This information may be shared with other companies within our Group.

### **Credit Scoring**

The details you provide, any information we already have and information from credit reference agencies may be used to assess credit risk using a technique called 'credit scoring'. Various factors in all these details help us to assess the risk. A score is given to each factor and a total credit score obtained. If your score is above a confidential pre-set pass score, the application is likely to succeed.

### **Credit referencing**

We will perform a search with a credit reference agency in relation to your leasing application. We may give details of the account and how it is conducted to credit reference agencies. If you do not repay rentals in full and on time, we may tell credit reference agencies who will record the outstanding debt. The information below provides further details about how credit reference agencies, we and other lenders use your information.

### **Marketing and use of E-mail and Preference Services**

Unless you have given us your consent, we will not provide information about you to companies outside our Group to use for their own marketing purposes. Companies within our Group may use and update your information to contact you by letter, telephone, email and text message provide you with products and services which might be suitable for you, to assess lending risks, to recover debts, to prevent, detect and prosecute fraud and other crimes, and to manage our and any member of our Group's relationship with you. Our Group may also use your information for research and statistical analysis with the aim of improving our services.

If you email us, or give us your email address, we will keep a record of it. We may use it to contact you occasionally about other products and services which may interest you, unless you ask us not to do so. We will not give your email address to any unauthorised third parties. When emailing us, we recommend you use the email facility on our websites to make sure that the content of your email is secure. If you send us email in other ways, remember that it will be 'insecure' and could be intercepted. If you do send us 'insecure' email, please keep the amount of confidential information you include to a minimum. We will do likewise when we reply.

We try to limit our customer contact programme to acceptable levels, but if you wish to exercise your right to opt out (remembering that opting out could stop us contacting you about any of our products or services that may benefit you), simply write to:

Data Protection Officer  
RentSmart Ltd  
7<sup>th</sup> Floor, Oakland House,  
Talbot Road,  
Manchester,  
M16 0PQ

or send an e-mail to [customerservice@rentsmart.co.uk](mailto:customerservice@rentsmart.co.uk)

If you do not want to receive unsolicited mail from other companies, you can prevent this by registering with the Mailing Preference Service. In addition, the Telephone and Fax Preference Services enable you to object to receiving unsolicited marketing phone calls or faxes from other companies. To register, simply telephone the appropriate number i.e.

Mailing Preference	– 020 7291 3310
Telephone Preference	– 020 7291 3320
Fax Preference	– 020 7291 3330

Alternatively, you can register online. For more details about all the Preference Services, please see the Direct Marketing Association's website ([www.dma.org.uk](http://www.dma.org.uk)).

### **Introducers and Agents**

Any company or firm that introduced you to us (a "Retailer") may use your information to contact you about products and services, unless you have asked them not to do so. In some cases, the Retailer will have been introduced to us by a third party (the "Introducer"). If this is the case and, having performed our credit checks, we decide to decline your application, we will refer your application back to the relevant Introducer. The Introducer may refer your application to another lessor or creditor for their consideration. We will be passing your personal information to the relevant Introducer for this purpose.

Sometimes we need to give information to Retailers, Introducers, our agents, subcontractors and other third parties (such as, insurers) so that they can provide a particular service for us or in connection with the administration of our agreements with them.

### **Call Recording and Confidentiality**

We may record phone conversations to offer you additional security, resolve complaints, improve our service standards and for staff training purposes. We provide training and education to all our staff to remind them about their confidentiality obligations and our policies and procedures are regularly audited and reviewed.

#### **Q: What is a credit reference agency?**

**A:** Credit reference agencies (CRAs) collect and maintain information on consumers' and businesses' credit behaviour, on behalf of organisations in the UK.

#### **Q: What is a fraud prevention agency?**

**A:** Fraud Prevention Agencies (FPAs) collect, maintain and share, information on known and suspected fraudulent activity. Some CRAs also act as FPAs.

#### **Q: Why do you use them when I have applied to your organisation?**

**A:** Although you have applied to us, STB Leasing Limited and we will check our own records, we will also contact CRAs to get information on your credit behaviour with other organisations. This will help us make the best possible assessment of your overall situation before we make a decision.

**Q: Where do they get the information?**

**A:** publicly available information:

- The Electoral Register from Local Authorities
- County Court Judgments from Registry Trust.
- Bankruptcy (and other similar orders) from the Insolvency Service.
- Fraud information may also come from fraud prevention agencies.
- Credit information comes from information on applications to banks, building societies, credit card companies etc and also from the conduct of those accounts.

**Q: How will I know if my information is to be sent to a CRA or FPA?**

**A:** You will be told when you apply for an account if your application data is to be supplied. The next section of this leaflet will tell you how, when and why we will search at CRAs and FPAs and what we will do with the information we obtain from them. We will also tell you if we plan to send payment history information on you or your business, if you have one, to CRAs. You can ask at any time the name of CRAs and FPAs.

**Q: Why is my data used in this way?**

**A:** We and other organisations want to make the best possible decisions we can, in order to make sure that you, or your business, will be able to repay us. Some organisations may also use the information to check your identity. In this way we can ensure that we all make responsible decisions. At the same time we also want to make decisions quickly and easily and, by using up to date information, provided electronically, we are able to make the most reliable and fair decisions possible.

**Q: Who controls what such agencies are allowed to do with my data?**

**A:** All organisations that collect and process personal data are regulated by the Data Protection Act 1998, overseen by the Information Commissioner's Office. All credit reference agencies are in regular dialogue with the Commissioner. Use of the Electoral Register is controlled under the Representation of the People Act 2000.

**Q: Can just anyone look at my data held at credit reference agencies?**

**A:** No, access to your information is very strictly controlled and only those that are entitled to do so, may see it. Usually that will only be with your agreement or (very occasionally) if there is a legal requirement.



**Read this section very carefully,  
it will vary from lender to lender**

**What we do:**

**1. When you apply to us to open an account, we may: -**

- a) Check our own records for information on: -
  - i. Your personal accounts;
  - ii. and, if you have one, your financial associates' <sup>1</sup>personal accounts;
  - iii. if you are an owner, director or partner in a small business <sup>2</sup>we may also check on your business accounts.
  
- b) Search at credit reference agencies for information on: -
  - i. Your personal accounts.
  - ii. and if you are making a joint application now, or have ever done the following, we will check your financial associates' personal accounts as well: [No joint applications]
    - previously made joint applications;
    - have joint accounts;
    - are financially linked<sup>3</sup>.

---

<sup>1</sup> A financial associate will be someone with whom you have a personal relationship that creates a joint financial unit in a similar way to a married couple. You will have been living at the same address at the time. It is not intended to include temporary arrangements such as students or rented flat sharers or business relationships.

<sup>2</sup> A small business is defined as an organisation which might be sole trader, partnership or a limited company that has three or less partners or directors.

<sup>3</sup> Credit reference agencies may link together the records of people that are part of a financial unit. They may do this when people are known to be linked, such as being married or have jointly applied for credit or have joint accounts. They may also link people together if they, themselves, state that they are financially linked.

- c) Search at fraud prevention agencies for information on you and any addresses at which you have lived.

**2. What we do with the information you supply to us as part of the application: -**

- a) Information that is supplied to us will be sent to the credit reference agencies.
- b) If you give us false or inaccurate information and we suspect or identify fraud we will record this and may also pass this information to fraud prevention agencies and other organizations involved in crime and fraud prevention.
- c) Law enforcement agencies may access and use this information.
- d) Your data may also be used by us to offer you other products, but only if you have given your permission. That will be on the front of any form that you have completed.

**3. With the information that we obtain we will: -**

- a) Assess this application for credit and/or;
- b) Check details on applications for credit and credit related or other facilities;
- c) Verify your identity
- d) Undertake checks for the prevention and detection of crime or fraud and/or money laundering;
- e) We may use scoring methods to assess this application and to verify your identity;
- f) Manage your personal and/or business account (if you have one) with ourselves;
- g) Undertake periodic statistical analysis or testing to ensure the accuracy of existing and future products and services;
- h) Any or all of these processes may be automated.

**4. What we do when you have an account: -**

- a) Where you borrow or may borrow from us, we will give details of your personal and/or business account (if you have one) including names and parties to the account, and how you manage it/them to credit reference agencies.
- b) If you borrow and do not repay in full and on time, we will tell credit reference agencies.
- c) We may make periodic searches of our own group records and at credit reference agencies to manage your account with us, including whether to make credit available or to continue or extend existing credit. We may also check at fraud prevention agencies to prevent or detect fraud.
- d) If you have borrowed from us and do not make payments that you owe us, we will trace your whereabouts and recover debts.

**What Credit Reference and Fraud Prevention Agencies do**

**5. When credit reference agencies receive a search from us they will:**

- a) Place a search "footprint" on your credit file whether or not this application proceeds. If the search was for a credit application the record of that search (but not the name of the organisation that carried it out) may be seen by other organisations when you apply for credit in the future.
- b) Link together the records of you and anyone that you have advised is your financial associate including previous and subsequent names of parties to the account. Links between financial associates will remain on your and their files until such time as you or your partner successfully files for a dissociation with the credit reference agencies<sup>4</sup>.

**Supply to us: -**

- c) Credit information such as previous applications for credit and the conduct of the accounts in your name and of your associate(s) (if there is a link between you – see 1b above) and/or your business accounts (if you have one).
- d) Public information such as County Court Judgments (CCJs) and bankruptcies.
- e) Electoral Register information.
- f) Fraud prevention information.

---

<sup>4</sup> Financial associates (see 1 a)iii) may "break the link" between them if their circumstances change such that they are no longer a financial unit. They should apply for their credit file from a credit reference agency and file for a "disassociation".

**6. When information is supplied by us, to them, on your account(s): -**

- a) Credit reference agencies will record the details that are supplied on your personal and/or business account (if you have one) including any previous and subsequent names that have been used by the accountholders and how you/they manage it/them.
- b) If you borrow and does not repay in full and on time, credit reference agencies will record the outstanding debt.
- c) Records shared with credit reference agencies remain on file for 6 years after they are closed whether settled by you or defaulted.

**7. How your data will NOT be used by credit reference agencies: -**

- a) It will not be used to create a blacklist.
- b) It will not be used by the credit reference agency to make a decision.

**How your data WILL be used by credit reference agencies:**

- c) The information which we and other organisations provide to the credit reference agencies about you, your financial associates and your business (if you have one) may be supplied by credit reference agencies to other organisations and used by them to
  - i. Prevent crime, fraud and money laundering by, for example checking details provided on applications for credit and credit related or other facilities
  - ii. Check the operation of credit and credit-related accounts
  - iii. Verify your identity if you or your financial associate applies for other facilities.
  - iv. Make decisions on credit and credit related services about you, your partner, other members of your household, or your business.
  - v. Manage your personal, your partner's and/or business (if you have one) credit or credit related account or other facilities.
  - vi. Trace your whereabouts and recover debts that you owe.
  - vii. Undertake statistical analysis and system testing.

**8. How your data may be used by fraud prevention agencies:**

- a) The information which we provide to the fraud prevention agencies about you, your financial associates and your business (if you have one) may be supplied by fraud prevention agencies to other organisations and used by them and us to:
  - i. prevent crime, fraud and money laundering by, for example: -
  - ii. Checking details provided on applications for credit and credit related or other facilities
  - iii. Managing credit and credit related accounts or facilities
  - iv. Cross checking details provided on proposals and claims for all types of insurance.
  - v. Checking details on applications for jobs or when checked as part of employment
- b) Verify your identity if you or your financial associate applies for other facilities including all types of insurance proposals and claims.
- c) Trace your whereabouts and recover debts that you owe.
- d) Conduct other checks to prevent or detect fraud
- e) We and other organisations may access and use from other countries the information recorded by fraud prevention agencies.
- f) Undertake statistical analysis and system testing.

Please contact us on 0161 333 2400 if you want to receive details of the relevant fraud prevention agencies. We and other organisations may access and use from other countries the information recorded by fraud prevention agencies.

9. Your data may also be used for other purposes for which you give your specific permission or, in very limited circumstances, when required by law or where permitted under the terms of the Data Protection Act 1998.

10. Your data may also be used to offer you other products, but only if permitted

## **Customer complaints**

A copy of our complaints procedure is available on request. Complaints that we cannot resolve may be referred to the Financial Ombudsman Service.

## **Additional needs**

We are committed to meeting the needs of all our customers. If you have a hearing or speech impairment, you can use Typetalk whenever you contact us.

Information is available in large print, audio and Braille on request.

Telephone calls may be recorded for security purposes and may be monitored under our quality control procedures.

## **How to find out more**

You can contact the CRAs currently operating in the UK; the information they hold may not be the same so it is worth contacting them all. They will charge you a small statutory fee.

**CallCredit**, Consumer Services Team, PO Box 491, Leeds, LS3 1WZ or call 0870 0601414

**Equifax** PLC, Credit File Advice Centre, PO Box 3001, Bradford, BD1 5US or call 0870 010 0583 or log on to [www.myequifax.co.uk](http://www.myequifax.co.uk)

**Experian**, Consumer Help Service, PO Box 8000, Nottingham NG80 7WF or call 0844 4818000 or log on to [www.experian.co.uk](http://www.experian.co.uk).

Please contact us at  
Data Protection Officer  
RentSmart Ltd  
7th Floor, Oakland House,  
Talbot Road,  
Manchester,  
M16 0PQ

or send an e-mail to [customerservice@rentsmart.co.uk](mailto:customerservice@rentsmart.co.uk), if you want to receive details of the relevant fraud prevention agencies.