

# DATA PROTECTION POLICY



At Traction, we take the privacy of our customers, employees and suppliers seriously and we are committed to protecting your personal data. We aim to be clear about how we use personal data and this privacy notice will inform you as to how we look after your personal data, what personal data we process and why. It includes the relevant requirements of the General Data Protection Regulation. It applies when you are employed or hoping to be employed by us, visit our website (regardless of where you visit it from), when you use our services or provide us with a service.

## 1. Important information and who we are

This privacy notice aims to give you information on how Traction collects and processes your personal data through your dealings with us, including your use of our website or when you use any service we offer. It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

### Controller

Lease Options Limited t/a Traction Finance ('Traction') will be the 'Controller' of the personal data that you provide to us. Traction's company registration number is NI46821 in the United Kingdom, and its registered address is Unit 33, City Business Park, Creighton Road, Dunmurry, Belfast BT17 9HY. In the Republic of Ireland the company registration number is 488976, and the registered address is Unit A6, M4 Business Park, Celbridge, Co Kildare W23 VFY7

### Third-party links

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## 2. Where you can contact us if you have any questions about how your personal data is processed

We have appointed a data privacy officer who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy officer at [dataprotection@tractionfinance.com](mailto:dataprotection@tractionfinance.com) or telephone 028 9030 9000.

## 3. What types of personal data do we process, and where do we get that personal data from

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may need to collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, username or similar identifier, title, date of birth and gender.
- **Contact Data** includes billing address, email address and telephone numbers.
- **Financial Data** includes payment details, bank accounts etc.
- **Transaction Data** includes details about payments to and from you and other details of services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address and other technology on the devices you use to access this website.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us.
- **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, genetic and biometric data as well as information about criminal convictions and offences).

If you fail to provide personal data we may not be able to perform the contract we have or are trying to enter into with you. We will notify you if this is the case at the time.

### How is your personal data collected?

We use different methods to collect data from and about you including through:

**Direct interactions.** You may give us your Identity, Contact, Financial and Special Category Personal Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- Apply for employment
- Commence employment
- Use our services
- Provide us with services; or

- Participate in an event sponsored by Traction

**Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your browsing actions. We collect this personal data by using cookies.

#### 4. 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 we need to perform the contract we are about to enter into or have entered into 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.
- Where we wish to communicate marketing information about Traction directly to you.

Generally we do not rely on consent as a legal basis for processing your personal data.

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

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
HR & Payroll requirements	(a) Identity (b) Contact (c) Financial (d) Special Category	Performance of a contract with you
To register you as a new customer	(a) Identity (b) Contact (c) Financial	Performance of a contract with you
To manage our relationship with you which will include:  (i) General account maintenance  (ii) Notify you about information relevant to our services;  (iii) Notifying you about changes to our terms or privacy policy	(a) Identity (b) Contact (c) Financial (d) Transactional (e) Marketing and Communications	(a) Performance of a contract with you  (b) Necessary to comply with a legal obligation  (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)  (b) Necessary to comply with a legal obligation
To make suggestions and recommendations to you about	(a) Identity (b) Contact	Necessary for our legitimate interests (to

recommendations to you about services that may be of interest to you	(c) Technical (d) Marketing & Communications	develop our products/services and grow our business)
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## LAWFUL BASIS

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

## Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

We may use your Identity, Contact, Technical usage and Marketing & Communication Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us, purchased services from us, or provided us with your details at an event run by or sponsored by Traction, and in each case you have not opted out of receiving that marketing.

## Third-party marketing

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

## Opting out

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by [contacting us](#) at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

## Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see <https://www.tractionfinance.com/>.

## Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 5. Who we disclose your personal data to and why

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Internal Third Parties - Other companies in the Traction Group acting as joint controllers or processors and who are based in the EEA and who may provide IT and system administration services and undertake leadership reporting.
- Third Parties
  - Service providers acting as processors based in the EEA who provide services including IT and system administration services.
  - Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors, insurers and finance houses based in the United Kingdom or Ireland who provide consultancy, banking, legal, insurance, accounting and financial services.

- HM Revenue & Customs, Revenue Commissioners, regulators and other authorities acting as processors or joint controllers based in either the United Kingdom or the Republic of Ireland.
- 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 notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## 6. International transfers

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring the service providers use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.

## 7. How we store your data securely

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

## 8. Data retention

### How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request by contacting us. In some circumstances you can ask us to delete your data: see Request erasure below for further information.

## 9. What rights you have in relation to your personal data and how you can exercise these rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). Address: Information Commissioner's Office, 3rd Floor, 14 Cromac Place, Belfast, BT7 2JB Tel: 028 9027 8757 or 0303 123 1114 Email: [ni@ico.org.uk](mailto:ni@ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

When we receive a complaint from a person we make up a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint. We will only use the personal information we collect to process the complaint and to check on the level of service we provide.

We usually have to disclose the complainant's identity to whoever the complaint is about. This is inevitable where, for example, the accuracy of a person's record is in dispute. If a complainant does not want information identifying him or her to be disclosed, we will try to respect that. However, it may not be possible to handle a complaint on an anonymous basis.

We will keep personal information contained in complaint files in line with our retention policy. This means that information relating to a complaint will be retained for two years from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

Similarly, where enquiries are submitted to us we will only use the information supplied to us to deal with the enquiry and any subsequent issues and to check on the level of service we provide  
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 transfer** 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.
- **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.

If you wish to exercise any of the rights set out above, please contact us at [\[weblink to be inserted\]](#).

#### **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

#### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

#### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

#### **10. Changes to This Data Protection Notice**

Like any business, our business will change over time and so will the way we use and protect your personal data. As a result, we may need to make changes to this General Data Protection Notice. These changes will not reduce your rights or the level of protection we apply to your personal information. The most up to date General Data Protection Notice will always be published on our website and we will clearly identify the changes we have made in any updates. You can contact us anytime via <https://www.tractionfinance.com/> or telephone 028 9030 9000 or email [dataprotection@tractionfinance.com](mailto:dataprotection@tractionfinance.com).

This Privacy Notice was last modified on 1<sup>st</sup> October 2018.