



Experian Consumer Privacy Policy

Last updated: 23 May 2018

We take your privacy seriously. This Privacy Policy explains what personal information we collect and how we use it.

We encourage you to read this policy thoroughly.

Who is Experian and how can you contact us?

When we refer to 'Experian' in this Privacy Policy, we mean Experian Limited.

Experian is part of a group of companies whose parent company is listed on the London Stock Exchange (EXPN) as Experian plc. The Experian group of companies has its corporate HQ in Dublin, Ireland, and its operational HQs in Costa Mesa, California and Nottingham, UK. You can find out more about the Experian group on our website at www.experianplc.com.

If there's anything you're unsure about in this Privacy Policy, feel free to contact our Data Protection Officer at uk.dpo@experian.com.

What information we collect

We will need to ask you for certain personal information to give you the best possible experience when you engage with us (via our websites and apps or otherwise) and when you use our products and services.

We will also collect other information about you and the devices you use to access our website, or we may ask third parties to do this for us, in these cases we do so by using technologies such as cookies. See also our [Cookies policy](#).

Contact information

When you apply for Experian services we will ask you to provide some contact information. Contact information may include some or all of the following: full name, previous names, residential address, previous residential addresses, date of birth, landline phone number, mobile phone number and email address. We will only retain your contact information for six years after the end of the provision of services in order to answer any queries you may have. Where you have agreed to receive marketing, but not signed up for a product (or not held a product for over six years), we will only continue to keep your data for marketing purposes if

you have opened or responded to marketing messages in the previous six months. However, information about address links or aliases which you tell us about during registration may be kept indefinitely to help us improve the quality of our data (see below).

Payment

Where the services you select carry a cost, we will ask you to provide some payment information. Payment information may include some or all of the following: credit card and debit card details. We will only retain your Payment information for two years after the end of the provision of paid-for services in order to simplify any further payment requirements you may have.

Security

For most of the services you access on our website, we will ask you to provide security information that only you will know. Security information may include some or all of the following: mother's maiden name, password and memorable word. We will only retain your security information for six years after the end of the provision of services in order to answer any queries you may have and identify you when you contact us.

Web monitoring

For the web monitoring services that are available to some customers, we will ask you to provide your chosen information to be monitored. This may include some or all of the following: passport number, driving licence number, national insurance number, credit card details and any other information you choose to have us monitor. We will only retain your Web Monitoring information for as long as we continue to provide the relevant services and you can delete it at any time.

Device

We also collect certain data automatically from your visit to our website or use of our services. This may include (but is not limited to) some or all of the following: How you connect to the internet (including IP address), how you engage with our site, screen resolution, browser data stored on your device (such as cookies – see also our [Cookies policy](#)), information about the device software you are using such as internet browser and location data (city, region of the IP address you used when accessing our services). We will only retain your Device information for 26 months after the end of the provision of Services.



Credit information

We may need to access data we already hold about you on our credit bureau, or we may gather similar information from other credit reference agencies (Callcredit and Equifax). This may include (but is not limited to) some or all of the following: details of credit accounts held and repayment performance as well as public information such as inclusion on the electoral roll, bankruptcies and county court judgements. We will only retain the Credit information we derive from the credit bureau for two years from the query in question in order to enable us to answer your queries.

How we use your information

We use your personal information in lots of ways to make our products and services as effective as possible.

To enable you to access our website and use our services

We will use your information to accept you as a new/returning customer and continue to provide you with our products and services.

To let you know about significant changes to our products, terms or privacy policy

We will let you know by email, SMS, push notification or when you log in to the site if there are significant changes to our products, their features, our terms, or our privacy policy.

To confirm your identity and authenticate the information you provide

As part of providing services to you we will confirm your identity and authenticate the information you provide for security purposes.

Establishing your identity is important as the services may provide you with your personal credit information (such as your credit score or credit report) and we must be sure you are who you say you are. Identity checking may also involve checking the registration information you give us against information we already hold about you as a credit reference agency and potentially publicly available information about you such as from social media.

If we are unable to confirm your identity from the registration information you provide, we will let you know by using the contact details you have provided and you may then have the option to make a written application and provide further proof of your identity.



To process payments and collect arrears

We will use your information to process the payments you commit to when signing up to our services and for the collection of any future payments or overdue amounts for those services.

Your payment card provider may let us know if the card details relating to your Experian payment change. If this happens, we reserve the right to update certain card details to make sure your access to our services isn't interrupted.

So for example, if you get a new payment card with a later expiry date to the one you currently pay with (but all the other details stay the same), we may update your payment card expiry date accordingly.

To provide and improve customer support

We will use your information to be able to provide and improve the customer support we provide to you (e.g. when you have questions or when you forget your log-in information).

To provide alerts

We will use your information to send you alerts where 'Alerts' are part of the service you ask us to provide e.g.

- web-monitoring when we find your personal details are available to others online.
- where there are certain changes to your credit report.

To send you service communications

We will use your information to contact you to tell you about changes to or issues affecting the services you are taking.

To provide comparison services and create eligibility ratings

When you use our comparison service to search for products, the information you provide is used to retrieve information about products relevant to your search and create a table which allows you to compare them.

Where eligibility ratings are available, information from your credit file with Experian (and sometimes Callcredit and Equifax) is also used to help you understand whether you are likely to be accepted.



In some circumstances, we will share that information and your personal information (such as name and address) with brokers, lenders and providers of credit and financial products themselves (as described in the section "Who we share your personal information with").

To provide information related to your use of our comparison services

When you search for products, we may contact you by email or SMS to confirm activity relating to use of our comparison services, such as details of the searches you have made, results that you have seen when searching, or information about introductions you've requested to brokers and lenders.

To send you product eligibility alerts

As part of our free services (which are available to all customers), Experian will retrieve and use your credit bureau data (whether it's from Experian or the other two main credit reference agencies Equifax and Callcredit) to check your eligibility (as described in the above section 'To provide comparison services and create eligibility ratings') for third party products or services and notify you of credit opportunities, products and services that you may be eligible for.

When you log in to the website, we will show you updated eligibility ratings for products and services that may be available to you.

As part of this service we may also notify you by e-mail, SMS or post of new or updated eligibility ratings for products and services; for example if new products and services are added, or your eligibility has changed. You can choose not to receive email, SMS and postal communications about product eligibility whenever you want from your Experian Account page.

We will check your eligibility for third party products and services, and may send you alerts:

- when you log in to the website;
- when you request an eligibility check;
- at regular intervals (no more than every 30 days) since you last requested an eligibility check;
- when new credit products and services are added to the website;

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- when there is a change to your credit bureau data or Experian Credit Score (and we may pro-actively check your credit bureau data and Experian Credit Score to do this – which will not affect your credit rating);
 - when we predict you may be interested in a new credit product or service, for example if your existing promotional period is coming to an end.

Market research

Experian may select particular customers and invite them to be involved in market research. If you accept this invitation, we will use the feedback you give us to improve our products and services.

Administration of prize draws, competitions, membership offers, surveys and other promotional activities

From time to time we will run prize draws, competitions, promotions and surveys and, we will use the personal data you provide to us, to run such activities and to do what we agree to do as part of them.

Marketing (including electronic marketing)

We will use your information for marketing purposes such as if we think one of our products, services or offers, or those of our third party partners, may interest you, we or they may contact you about them by post, email, SMS or through app notifications.

If your Experian subscription has finished, we may contact you and invite you to re-subscribe to the same or a different service or product, or to use certain free features on our website.

You can opt out of marketing communications at any time by following the instructions in the email or SMS or by contacting us at customerservices@uk.experian.com. You can turn off app notifications at any time using the tools provided in your mobile operating system.

Fraud investigation, detection and prevention

We may use your information for fraud investigation, detection and prevention measures and in order to provide suitable security for your account and your information that we hold (such as to enable us to prevent others logging in to your account without your permission from unknown devices).



Investigation, detection and prevention of crime

We may use your information for the investigation, detection and prevention of crime (other than fraud).

Internal training purposes

We will use your information to ensure that our team has the knowledge and expertise they need to ensure we provide the best possible experience to our customers when interacting with us.

Reporting and analytical purposes

We will use your information for reporting and analytical purposes (e.g. how many of our customers are in the north or south of the country) to enable us to improve our products and services and to provide appropriate levels of support to our customers.

Tracking activity

We will use your information to track your activity on our apps and on our websites to help us better understand your interests and how you interact with us. We may also use this information to help us detect if someone else is trying to access your account or use the services you take from us. We will also use this information to better engage with you and to ensure that you get the best service we can provide and improve our products in the future.

To maintain our records and other administrative functions

Like any business, we need to ensure that we maintain comprehensive and up to date records of the ways we process your personal information and other operational activities and therefore we will process the information you provide for record-keeping, updates and general administrative purposes.

Complaint and dispute resolution

Whilst we will try to make sure that you are happy with the service we provide and do not feel the need to complain, if you do complain to us, we will use the information we have about you to help us manage your complaint.

To comply with the law

Like any other business, we are required to comply with many laws and regulations. We will, where necessary, use your personal data to the extent required to enable us to comply with these requirements.

To improve data accuracy and completeness

Personal information you provide to us may be used to improve the credit bureau information we already hold about you in our role as a credit reference agency. E.g. if you provide a different address or alias to the one we hold already we may store the new address or alias in the credit bureau information to aid quicker identification of you and ensure that lenders can see a full picture of you when making lending decisions, it also aids identification and verification in the credit application process.

Email tracking

Experian may use performance tracking technology within our emails to improve our future interactions with you. This means we are able to capture information including (but not limited to) the time and date you open our e-mails and the type of device used to open the email.

We use this information primarily to understand whether our e-mails are opened and what links are clicked on by our customers. We then use this information to improve the emails that we send to you and the services that we provide.

We may share this information with other organisations to help them improve their own interactions with you. Your personal data will not be passed to any third party for marketing purposes unless you already have an existing relationship with them. You will not receive marketing emails from such third party organisations unless you have given your prior consent to them to send emails to you.

Further information is included in our [Cookies policy](#).

To personalise online experiences

Experian may use your data to enable website personalisation and improved online experience with us and other websites or online services you may visit, and to enable advertisers to display ads that may be relevant to you when you visit this and/or other unrelated websites or online services.

In order to do this, Experian will use your name, postal and email address, along with demographic and other data it already holds from other sources. No information contained on your credit report will be used. Your personal data will not be shared by Experian with any third party, including these advertising networks and the websites or online services that display the advertisements.

To opt out of your data being used for this purpose, please click here:

<http://das.uk.experian.com/experianoptout/>. Opting out will not prevent online advertising being displayed to you; it will only prevent the use of your data in making these advertisements more relevant to you.

Further uses of your personal information not described in this Privacy Policy

If we use your personal information for any purposes that are not set out in this Privacy Policy we promise to let you know exactly what we will use it for before we go ahead and use it and obtain your consent where appropriate.

What are the legal grounds for handling personal information?

Data protection laws require that, where we process your personal data, we must satisfy at least one prescribed condition for processing. These are set out in data protection law and we rely on a number of different conditions for the activities we carry out.

Necessary for performance of a contract or to comply with law

In most cases, the information described above will be provided to us by you because you want to take services from us or engage with us and our use of your information will be governed by [contract terms](#). Giving this information to us is therefore your choice. If you choose not to give all or some of it to us, this may affect our ability to provide the services you want, to you. In particular, we may rely on this condition for processing in the following scenarios:-

- To enable you to access our website and use our services.
- To let you know about significant changes to product, terms or privacy policy.
- To confirm your identity and authenticate the information you provide.
- To process payments and collect arrears.
- To provide and improve customer support.
- To provide alerts.
- To send you service communications.

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- To provide comparison services and create eligibility ratings.
 - To provide information related to your use of our comparison services.
 - To send you product eligibility alerts.

Consent

Where we collect other information from you such as when we use cookies to collect information about the device you use to access our website, or sometimes third parties collect this on our behalf. You will be asked to consent to this before using our website. If you choose not to give your consent, or you later remove your consent, this may affect our ability to provide the services you want, to you. We may also rely on consent in the following scenarios:-

- **Market research** – we may send you invitations to participate in market research (see below). If you do so, your feedback is given with your consent.
- **Administration of prize draws, competitions, membership offers, surveys and other promotional activities**

Necessary in our legitimate interests or those of a third party

In the United Kingdom, we can also use personal information where the benefits of doing it are not outweighed by the interests or fundamental rights or freedoms of individuals. The law calls this the “Legitimate Interests” condition for processing. Where we rely on it, the benefits being pursued by us are:-

- **Marketing (including electronic marketing)** - From time to time, we would like to let you know about products, services and offers from Experian and our partners.
- **Helping to prevent and detect crime such as fraud and money laundering**
Fraud and money laundering cost the British economy many billions of pounds every year. That cost is ultimately passed on to the public in the form of higher prices. By helping to avoid fraud such as identity theft, we help to stop this from happening.
- **Complying with/supporting compliance with legal and regulatory requirements**
We must comply with various legal and regulatory requirements. Additionally, the services we provide help other organisations to comply with their own legal and regulatory obligations. For example, Experian is regulated by the Financial Conduct Authority.

- **Internal training purposes** - to enable us to train our staff to better provide services to our customers.
- **Reporting and analytical purposes** – to provide management information and information to improve our services.
- **Tracking activity** – to help us to improve our services.
- **To maintain our records and other administrative purpose**
To enable Experian to provide the most accurate data for our customers and clients.
- **Complaint and dispute resolution** – we will need to use customer data when looking into queries and complaints.
- **To improve data accuracy and completeness**
When you register for our services you may supply us with additional information about yourself which we will use to improve our data accuracy and completeness.
- **Email tracking** – in order to improve our communications to our customers.
- **To personalise online experiences as part of a marketing services and data business.**
Like any commercial organisation, we run a business and process information where necessary to do so. We also provide services to third parties which help them to run their businesses more effectively and efficiently.
We have put in place various safeguards to ensure that individuals' whose personal information we handle are not unduly harmed by the activities we use their personal data for. These include making information available to individuals so that they understand how their personal data will be used by Experian, explaining their rights to obtain the information we hold and to have their information corrected or restricted and providing information about how individuals can complaint if they are dissatisfied.
- **Invitations to participate in market research**
In order to improve the service we offer to customers, we may ask you to participate in research for time to time. It is entirely up to you whether you choose to do so.

Who we share your personal information with

We share your personal information only with those persons who need to handle it so we can provide the Experian products and services you've signed up to. We also share it with companies within the Experian group who manage some parts of the services for us; with suppliers who provide services to us which require access to your personal information only; and with resellers, distributors and agents involved in delivering the services we provide where necessary for them to do so.

Lastly, we may also provide your personal information to fraud prevention agencies. This is to protect the Experian group of companies and our customers, to keep our systems secure, or where it's necessary to protect either yours or our best interests.

1. **Group companies**

As a member of the Experian group of companies, we can benefit from the large IT infrastructure and expertise that exists within our business. This means that the personal data you provide to us may be accessed by members of our group of companies for support and administrative purposes.

2. **Suppliers**

We use a number of service providers to support our business and these service providers may have access to our systems and data in order to provide services to us and/or to you on our behalf.

3. **Resellers, distributors and agents**

We sometimes use organisations to help provide our products and services to clients and customers. Personal data may be provided to them in connection with this purpose.

4. **Fraud prevention agencies**

We will check your details with the records we hold and share with fraud prevention agencies. If false or inaccurate information is provided and fraud is identified, we will record this and details will be passed to the other 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:

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

Please contact us at Experian Ltd, PO Box 8000, Nottingham, NG80 7WF if you want to receive details of the fraud prevention agencies.

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

5. Public bodies, law enforcement and regulators

The police, other law enforcement agencies, regulators, as well as public bodies such as local and central authorities can sometimes request personal information. This may be for the purposes of preventing or detecting crime, apprehending or prosecuting offenders, assessing or collecting tax, investigating complaints or assessing how well a particular industry sector is working.

6. Brokers, lenders and providers of credit and financial products

In some circumstances, we will share credit report information and your personal information (such as name and address) with brokers, lenders and providers of credit and financial products themselves for purposes that may include:

- verifying your eligibility for the products;
- verifying suitability of products;
- those set out in the lender's terms and conditions and/or its privacy policy relevant to the product you are searching for;
- assisting you in completing your application to the lender (which may include pre-populating the application form on their website);
- contacting you regarding credit and financial products; and complying with any contractual, legal and/or regulatory obligations.

7. Individuals

You can obtain a copy of the information we hold about you. See section Your rights

to how we use your personal information for further information on how you can do this.

Where in the world do we send information?

Experian is based in the UK, which is where our main databases are. We also operate elsewhere in and outside the European Economic Area, so we may access your personal information from and transfer it to these locations as well. Don't worry though, any personal information we access from or transfer to these locations is protected by European data protection standards.

While countries in the European Economic Area all ensure rigorous data protection laws, there are parts of the world that may not be quite so rigorous and don't provide the same quality of legal protection when it comes to your personal information.

To make sure we keep your personal information safe, we apply strict safeguards when transferring it overseas. For example:

1. Sending your personal information to countries approved by the European Commission as having high quality data protection laws, such as Switzerland, Canada and the Isle of Man.
2. Putting in place a contract that has been approved by the European Commission with the recipient of your personal information that provides a suitable level of high quality protection.
3. Sending your personal information to a member organisation approved by the European Commission as providing a suitable level of high quality protection. For example, the Privacy Shield Scheme that exists in the US.

Your rights to how we use your personal information

It is important that you understand your rights in relation to your personal information and how you can contact us if you have questions or concerns.

If you've given us consent to process your personal information, you have the right to withdraw that consent at any time by contacting us on uk.dpo@experian.com. You can also make changes to that preference in your Experian account.

You can also ask for access to the personal information we hold about you and request that we correct any mistakes, restrict or stop processing or delete it. It's worth noting that in some cases if you do ask us to correct, delete or stop processing it, we won't always be required to do so. If that is the case, we will explain why. To request a copy of the personal information we hold about you, please visit <http://www.experian.co.uk/consumer/data-access>.

In certain circumstances (e.g. where you provide your information to us (a) with consent to process it or (b) where the processing is necessary for the performance of our contract with you) you can require that we provide the information we hold about you either to you or a third party in a commonly used format. This only applies if we are processing it using automation only. If you would like more information about this, let us know by contacting us at uk.dpo@experian.com.

We will try to ensure that we deliver the best levels of customer service but if you think we are falling short of that commitment, please let us know by contacting us at uk.dpo@experian.com

If you're still unhappy with any aspect of how we handle your personal information you also have the right to contact the Information Commissioner's Office (ICO), the supervisory authority that regulates handling of personal information in the UK. You can contact them by:

1. Going to their website at <https://ico.org.uk/>
2. Phone on 0303 123 1113
3. Post to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF

You may also see our full complaints handling procedure and how to make a complaint. If we cannot resolve things under that procedure, then you may have the right to refer your complaint, free of charge, to the Financial Ombudsman Service. The contact details for the Financial Ombudsman Service are: Telephone: 0300 123 9 123, or from outside the UK +44 20 7964 1000 E: complaint.info@financial-ombudsman.org.uk W: www.financial-ombudsman.org.uk Financial Ombudsman Service Exchange Tower London E14 9SR

You also have the option to register your complaint using the [European Commission Online Dispute Resolution \(ODR\) platform](#). This is a web-based platform that is designed to help



consumers who have bought goods or services online to deal with issues arising from their purchase.

How we keep your personal information secure

Online privacy and security is the most important aspect of any customer service and we take it extremely seriously. We use a variety of the latest technologies and procedures to protect your personal information from unauthorised access, destruction, use or disclosure.

Experian have a comprehensive Global Security Policy based on internationally recognised standards of security (known as ISO27001 standard) and holds ISO27001 certification in the key areas of Global Security Admin team who are responsible for administering logical access to systems and in the Data Centre.

Experian has a dedicated Cyber Security Investigations team who safeguard Experian's key assets such as its systems and storage facilities. This team, identify and effectively manage any security developments that may threaten Experian's people, process, or technology through intervention and the thorough investigation of security incidents. Experian holds Cyber Essentials Certification and performs risk assessments against our critical and external facing applications annually.

Experian is annually audited by an External QSA (Qualified Security Assessor) from Trustwave and have successfully maintained compliance since 2010.

How long we keep your personal information for

We'll keep your personal information for as long as we need it to provide the Experian products and services you've signed up to. We may also keep it to comply with our legal obligations, resolve any disputes and enforce our rights. These reasons can vary from one piece of information to the next and depend on the products or services you're signed up to, so the amount of time we keep your personal information for may vary.

In all cases, our need to use your personal information will be reassessed on a regular basis, and information which is no longer required for any purposes will be disposed of.

Changes to this Privacy Policy

We can update this Privacy Policy at any time and ideally you should check it regularly for updates. We won't alert you to every little change, but if there are any really important



changes to the Policy or how we use your information we'll let you know and where appropriate ask for your consent.