



# Experian Consumer Product Privacy Policy

**Effective date: 12 October 2020**

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 and read additional named privacy policies where applicable.

## Scope of this privacy policy

This policy applies to the processing of your personal data in relation to Experian's free and paid-for consumer products, including the free Experian account, our subscription services, our mobile apps and the consumer services on [experian.co.uk](https://www.experian.co.uk) such as comparison services and the 'contact us' functionality for non-Experian customers. Experian's free and paid-for consumer products are operated by Experian Consumer Services. This is the "consumer-facing" part of our business; the part that you and other consumers interact with.

Experian also operates a number of other businesses (which you may not normally interact with). Different privacy policies apply to those other businesses, and those policies discuss in more detail how your personal data might be processed.

Experian Consumer Services may share your data with some of those additional business functions, so that they may further process your personal data. We talk about this at '**How we use your information**' and '**Who we share your information with**', below.

Briefly, the other business functions that may further process your personal data (and their related privacy policies) are as follows:

Exerian business function	Relevant privacy notice	Description
Experian Credit Bureau (our credit referencing business)	'Credit Reference Agency Information Notice' (CRAIN)	The CRAIN provides information on how Experian and the UK's other main credit reference agencies collect, use and share personal data.
Experian Marketing Services (our marketing services business)	'Consumer Information Portal' (CIP)	<p>The information you provide to Experian Consumer Services might be used by Experian Marketing Services to: validate your current address and age; create models into the 'make-up' of the UK population for characteristics across age, gender, number of adults and composition of the household and length of residency; identify when you change address; in linking profiled data about you to a client's customer file (where you are already their customer) and for screening out of financial marketing where the financial offer is not appropriate for your circumstances.</p> <p>The CIP provides information on how Experian collects, uses and shares personal data for its clients' marketing purposes and other related activities.</p>

Please see the [CRAIN](#) and the [CIP](#) for more information on how the Experian Credit Bureau and Experian Marketing Services, use your personal data, and for further information on your rights in relation to your personal data, and how to exercise them.

**Please note that you can opt-out from Experian Marketing Services' processing of your personal data at any time by clicking [here](#). You can also do this via the [CIP](#).**

Please also see this helpful guide explaining what information lenders use about you when deciding whether to give you credit and what happens to the information after that if the lender opens and account for you.

We will refer to sections of the [CRAIN](#) and the [CIP](#) throughout this privacy policy where relevant. You can also find more information about Experian's additional business functions on our website at [www.experian.co.uk](http://www.experian.co.uk)

## Who is Experian and how can you contact us?

When we refer to 'Experian' in this Privacy Policy, we mean Experian Limited. Experian is the controller of your personal data.

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](http://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](mailto:uk.dpo@experian.com)

### What information we collect

We will need to ask you for certain personal information to deliver the services you have asked for and 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 and - if you have agreed to receive marketing - to let you know about related products and services that may be of interest to you. 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).

If you are using our comparison services but have not created an account you may be asked for similar information such as:

- Name
- Address
- DOB
- Contact details (email / telephone)

In this case this information this information will be kept for 36 months.  
If you use our live chat function but haven't signed up for a service, we may collect some contact information from you to enable us to support and resolve your query.

Any contact information collected as well as a record of the live chat conversation will be kept for 24 months.

## **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**

When we provide services to you we will access data we already hold about you on the Experian Credit Bureau, or we may gather similar information from other credit reference agencies (TransUnion 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 Experian Credit Bureau for two years from the query in question in order to enable us to answer your queries. Please see section 4 'What kinds of personal data to credit reference agencies hold, and where do they get it from?' of the [CRAIN](#) for further information.

## Bank account information

For the optional open banking related services available to some customers, where you provide Experian with permission to access your bank account(s), we will request your previous 24 months' bank account information. Where you allow us access to a joint account the bank account information we receive will include transactions made by both and the other person with you share the account with.

We (or our partners) will collect some, or all, of the following;

- Account name, number and sort code
- Account balance
- Details of your transactions, such as the amount credited or debited, date of transaction and name of payer or recipient Product details – fees, charges, interest, benefits/rewards
- Product details - fees, charges, interest, benefits/rewards

New transactions are collected each day to ensure the transaction information we process is accurate and up to date.

You can withdraw your permission for us to access this information at any time within the service. We will stop accessing new Bank account information from the point you disconnect your bank account(s), opt out of the service, or where your authentication period ends and you don't re-authenticate, whichever is sooner. We will also stop using the data for the purposes described within the notice displayed for Experian Boost when you opt-out of the service, or when we've had that data for three years, whichever comes first. However, we may continue to keep the data for up to three years from when we had it to comply with legal and regulatory requirements and related record-keeping.

## Data captured under comparison service

**General** - To obtain results from our comparison service you may be asked to provide additional information in order to obtain the most accurate quotations from brokers, aggregators, insurers, lenders and providers of credit. This includes

- Income
- Employment status
- Your answers to any other questions asked during the course of the comparison journey

We will store this information for up to 36 months from the date we first obtain it. After 36 months this personal information will be securely and permanently deleted. However general comparison services usage data that does not identify any individual user, may be kept for a longer period for reporting and analytics purposes.

**Insurance Quotations** - In order to display insurance quotes on our website, we need to collect and send your personal information to the panel of insurance partners or insurance brokers we work with that provide quotes. This is so that they can generate a quote for us to display to you on our website. The information we collect and share for this purpose includes:

- Vehicle details (including its usage)
- Insurance claims history

- Driving history (including convictions)
- Medical condition status
- Additional driver details

We will store this information for 36 months from the date we first obtain it.

## 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 the Experian Credit Score and send you credit score notifications**

We will use the Experian Credit Bureau data we hold and profile it to create the 'Experian Credit Score' by running the data through an algorithm called a scorecard. We will also use it to monitor and identify changes to your Experian Credit Score and may notify you by email, SMS or app notification about these changes or when a new score is available to be viewed.

### **To provide you with information from your Experian Credit Report**

Depending on the features in your subscription, information from the Experian Credit Bureau will be shared with you in a variety of ways, ranging from the display of the full Experian Credit Report to summarising salient credit report information.

### **To provide you with additional services related to your Credit Report information and Credit Score**

The data held in the Experian Credit Bureau will also be used to operate features designed to help you understand and act upon your Experian Credit Score. Different products are included in different subscriptions and include the ability to forecast future score changes, to optimize behaviour for score progression and to understand the factors which build up the Experian Credit Score.

### **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, the information you provide (including personal information such as your name and address) and your current and historical credit information from the Experian Credit Bureau (and sometimes the other credit reference agencies TransUnion and Equifax) has been profiled by running it through an algorithm known as a scorecard to create the eligibility rating displayed. The eligibility rating is to help you understand whether you are likely to be accepted based on the lender's criteria.

In some circumstances, we will share that information with brokers, aggregators, insurers, lenders and providers of credit, insurance and other 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 personalised product updates**

#### **Product eligibility updates**

As part of our free services (which are available to all customers), Experian will use the information you provide (including personal information such as your name and address, but excluding any Bank account information provided through our optional open banking services) and your current and historical credit information (whether it's from the Experian Credit Bureau or the other two main credit reference agencies, Equifax and TransUnion). We will use this to profile you to check your eligibility for third party products or services based on lenders' criteria, and notify you of credit opportunities, products and services that you may be eligible for. You can find more information around how we check your eligibility in the above section 'To provide comparison services and create eligibility ratings'.

We will check your eligibility for third party products and services, and may provide eligibility updates:

- when you interact with our service, e.g. when you use our website or mobile app, or engage with our communications;
- when you request an eligibility check;
- between your interactions with our service (whilst you're still signed up to our service);
- when new credit products and services are added to the website;
- 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 product or service, for example if your existing promotional period is coming to an end.

#### **Updates when you might save money or benefit from new products**

As part of our free services (which are available to all customers), Experian will use your current and historical credit information (from Experian's credit bureau) to identify opportunities to potentially save money or benefit from new products.

The type of credit information we will retrieve includes things like whether you're carrying a balance on a credit card, loan or mortgage account, what payments you have made, promotional indicators, how long you've had the account for and who your accounts are with. Based on this, we may notify you of these opportunities and may invite you to compare products available as part of our panel.

If you have used our insurance comparison service and our system identifies that your insurance renewal is due, we will submit your quote details to give you an idea of what your quotes could



be for your next renewal.

### **Managing your updates and notifications**

We may send you personalised product updates via email, SMS or postal communication about your eligibility for products and when we think you might save money or benefit from new products. These updates and the use of your personal data to create them can be managed within your Messaging Settings from your Experian Account page.

If you have our mobile app we may also notify you on the app and via app notifications. These notifications and the associated use of your personal data can be managed in the app settings or your device settings.

We may notify you of these updates when you log in to Experian.

### **To send you credit score notifications**

Experian will use the credit bureau data we hold to monitor and identify changes to your Experian Credit Score and may notify you by email, SMS or app notification about these changes or when a new score is available to be viewed.

### **To provide services that use your bank account information**

When you provide us with permission for your bank account information to be collected and used as part of our optional open banking related services, the main purposes that we may use that data for are;

#### **For Experian Boost;**

- We will use automated systems to look at your last 12 months of transactions and conduct profiling to determine how many payments we think you've made into savings accounts, to pay for digital entertainment and to pay your Council Tax. We then use that information, and the total amount of debits and credits on your account, to conduct further profiling to determine if your credit score should be boosted. You cannot alter our categorisation of your transactions, but if you're not happy with us doing this you should disconnect all your accounts, or cancel the Boost service, and this will prevent us from providing your boosted credit score or a summary of your open banking data to participating lenders.
- To present you with a consolidated view of the transaction data we have used when assessing if your score should be boosted, including showing you the transactions that have been categorised as payments that are having a positive impact on your credit score.
- If your credit score increases, we'll share your boosted score and a summary of your last 12 months' transactions (such as how many times we can see you have paid Council Tax) with participating lenders when you apply for credit or check your eligibility, alongside the other information from your credit report. Lenders include providers of traditional financial services such as mortgages, loans and credit cards but can also be firms who can charge for services after you use them, such as mobile phone companies and utility providers, as well as retailers who offer store cards or goods on finance. Lenders may use this information to help them provide accurate eligibility ratings (both directly and through price comparison websites) and to decide whether to offer you credit and on what terms. This may include using the information to assess how much you can afford to pay.

Lenders will not receive your actual bank transactions if you apply for credit with them or check your eligibility.

- To use the data for reporting, analysis and training to help us improve this service. For example, we may use our analysis to improve the accuracy of Experian Boost and to encourage more lenders to participate.
- Where you use our comparison services, we will show you where your summarised bank transaction data has been factored into the results presented to you.
- To use the full transaction history we hold about you since you joined Boost (and our categorisation of those transactions) for reporting, analysis, training and developing the Experian Boost service to help us improve this service. The development of the Experian Boost service includes using the data for the following purposes;
  - Developing and updating the way bank account information is used within the calculation of your credit score
  - Improving the categorisation techniques we use when identifying payments within your bank transactions that fit into certain categories (for example, digital payments)
- Allowing lenders with whom you have or in the past have had a relationship (i.e. previously/currently hold an account with, have previously applied to for credit or who have provided you with a quotation / eligibility rating via our comparison services) to analyse a summary of 12 months of your bank transactions from within the full transaction history we hold on you since you joined Experian Boost. This is to help lenders develop their own lending strategies, which will benefit Boost customers through enabling more lenders to factor summarised bank transactions into their future decisions.
- To ensure that you can maximise the benefit of the Experian Boost service, we will notify Experian's Pre-qualification Services business unit when you opt into Experian Boost. This will enable a summary of your bank transactions to be used in the decisions made by participating lenders and other price comparison sites who use Experian's Pre-qualification Services if you seek a quotation or eligibility rating directly from them. Further information is provided in the 'Who we share your personal information with' section below.
- We will show you which bank accounts you've given us permission to access and when the permission will expire. We'll keep a record of that permission, it's expiry as well as when you joined Experian Boost.

In addition to the main purposes your bank account information is processed for, it will also be processed for ancillary purposes which are explained in this document, such as sending you service emails related to Experian Boost or providing customer support if you contact us for support related to Experian Boost.

#### **For affordability assessment services;**

- To give you an indication of whether you could afford to take on additional credit/ borrowing based on your existing income and spending
- To show you a breakdown and categorisation of your spending habits and how you could make changes to increase the amount you could afford to borrow

## 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.

This information includes credit information which is received from the Experian Credit Bureau (but excluding any bank account or bank transaction information provided through our optional open banking services). Please see Section 4 'What kinds of personal data to credit reference agencies hold, and where do they get it from?' of the [CRAIN](#) for further information.

To make marketing as relevant and effective as possible, customer data will be profiled to create "segments" (e.g. those who are likely to be accepted for a particular credit card), or for certain key behaviors and circumstances to be identified (e.g. those who have previously shown a preference for a certain type of credit card, or those who tend to roll over monthly credit card payments). Customers will then be provided with marketing messages accordingly on site, in our mobile applications, through email, through email SMS or via in-app notifications.

For these marketing purposes, we will also use profiled data about you, your household or the area in which you live, which is received from Experian Marketing Services. This profiled data is not actual information about you but rather modelled predictions about the likely characteristics of individuals, households and geographic locations in the UK, such as preferred leisure pursuits, supermarkets likely to be used for shopping or likely social media usage.

More information about the personal data used by Experian Marketing Services and the purposes for which the data are processed is explained in the [CIP](#), which includes information about [modelling \(the predictions we make\) and data profiling](#).

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 from Experian Consumer Services at any time by following the instructions in the email or SMS or by contacting us at [customerservices@uk.experian.com](mailto:customerservices@uk.experian.com) You can turn off app notifications at any time using the tools provided in your mobile operating system.

**Please note that you can opt-out from Experian Marketing Services' processing of your personal data at any time by clicking [here](#). You can also do this via the [CIP](#).**

## **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, analytical and tracking**

We will use your information (including the credit information we hold about you on our Experian Credit Bureau but excluding any Bank account information provided through our optional open banking services), your behaviour on our websites and in our apps, and how you respond to our emails to understand you, your credit needs and how you use our services.

This analysis will be used to enable us to improve and promote our products and services, provide educational content, generate consumer insight (e.g. how many of our customers are in the north or south of the country) and to provide appropriate levels of support to our customers. No personal data will be publicly available as a result.

For these reporting and analytical purposes, we will use profiled data about you, your household or the area in which you live, which is received from Experian Marketing Services. This profiled data is not actual information about you but rather modelled predictions about the likely characteristics of individuals, households and geographic locations in the UK, such as preferred leisure pursuits, supermarkets likely to be used for shopping or likely social media usage. More information about the personal data used by Experian Marketing Services and the purposes for which the data are processed is explained in the [CIP](#), which includes information about [modelling \(the predictions we make\) and data profiling](#).

Please see Section 4 'What kinds of personal data to credit reference agencies hold, and where do they get it from?' of the CRAIN for further information on the data in the Experian Credit Bureau.

As part of improving our products and services, we may also share this analysis with selected lenders, insurers and brokers so they can determine whether they can improve the products or the terms under which their products are offered to Experian customers. No personally identifiable data will be shared by Experian Consumer Services with lenders, insurers and brokers, and we will put measures in place to prevent these parties from being able to re-identify you. You have the right to opt out of this processing by cancelling your agreement with us.

Please note that you can opt-out from Experian Marketing Services' processing of your personal data at any time by clicking [here](#). You can also do this via the [CIP](#).

More details of how we may track your interactions with our websites, apps and emails is available on our [Cookies](#) page.

### **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. Where necessary (i.e. where it is reasonable and proportionate for us to do so), we will use your personal data to the extent required to enable us to comply with these requirements. This could include sending you information that Experian is legally required to send for consumer products or another part of the Experian business (for example, where Experian makes updates to the CIP in relation to processing carried out by Experian Marketing Services).

### **To improve data accuracy and completeness**

Personal information you provide to us during registration, when you search for credit products in our comparison services or when we search on your behalf may be used to improve the Experian 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 add to your details in the bureau the new address or alias 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.

Please see Section 4 'What kinds of personal data to credit reference agencies hold, and where do they get it from?' of the [CRAIN](#) for further information.

### **To personalise online experiences**

Experian may use your data (excluding any Bank account information provided through our optional open banking services) to enable website personalisation and improved online experience with us and other websites or online services you may visit.

For these marketing purposes, we will also use profiled data about you, your household or the area in which you live, which is received from Experian Marketing Services. This profiled data is not actual information about you but rather modelled predictions about the likely characteristics

of individuals, households and geographic locations in the UK, such as preferred leisure pursuits, supermarkets likely to be used for shopping or likely social media usage.

More information about the personal data processed by Experian Marketing Services and the purposes for which the data are processed is explained in the [CIP](#), which includes information about [modelling \(the predictions we make\) and data profiling](#). This data may also include credit information which is received from the Experian Credit Bureau. Please see Section 4 'What kinds of personal data to credit reference agencies hold, and where do they get it from?' of the [CRAIN](#) for further information.

Your personal data will not be shared by Experian with any third party, including advertising networks and any websites or online services that may display personalised experiences or advertisements. Further information is included in our Cookies page.

### **To use special category data in order to generate insurance quotations**

In order to provide motor insurance quotes, we may ask you to provide information about yourself which data protection laws define as "special category" data. This includes information about your health (such as any medical conditions). We may also ask you to provide information relating to criminal convictions or alleged or actual criminal offences, for example traffic offences. We need to collect this information and share it with brokers and insurers so that they can provide quotes. For more information around how and why we handle this information please see the "Public Interests" section under "What are the legal grounds for handling personal information?".

**Please note that you can opt-out from Experian Marketing Services' processing of your personal data at any time by clicking [here](#). You can also do this via the [CIP](#).**

## **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 your Experian Credit Report.
- To provide you with information from your Experian Credit Report.
- To provide you with additional services related to your Experian Credit Report information and Experian Credit Score.
- To provide alerts.
- To send you service communications.
- To resolve complaints and disputes where; - you are an existing Experian customer and/or; - your complaint/dispute relates to an FCA regulated part of our services.
- To provide comparison services and create eligibility ratings.
- To provide information related to your use of our comparison services.
- To send you personalised product updates.
- To provide the Experian Credit Score and send you credit score notifications.
- To provide services that use your bank account information.
- To keep records and carry out other administrative functions.
- To comply with the law, including the prevention and detection of crime.

## Consent

We obtain your consent when we use non essential cookies, or technology similar to cookies, to collect information about the device you use to access our website. Sometimes we use third parties collect this information on our behalf. You will be asked to consent to the use of non-essential cookies 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 services to you. Further information about the cookies is included in our Cookies page.

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.
- **Internal training purposes** - to enable us to train our staff to better provide services to our customers.
- **Reporting, analytical and tracking purpose** –to provide management information and information to help improve and promote our services and communications and those of our partners.
- **To resolve complaints and disputes where you are no longer an Experian customer and your complaint or dispute is not about an FCA regulated part of our services** – we will

need to use customer data when looking into queries and complaints.

- **To improve data accuracy and completeness** - when you register for or use our services you may supply us with information about yourself which we will use to improve our data accuracy and completeness across our wider business (including sharing your data with the Experian Credit Bureau for these purposes) and enable Experian to provide the most accurate data for our customers and clients.
- **To personalise online experiences** – to enable us to present you with the most relevant and useful content and information. We will do this in our own website and apps as well as third-party website and apps
- **Invitations to participate in market research** - in order to improve the service we offer to customers, we may ask you to participate in research from time to time. It is entirely up to you whether you choose to do so
- **To provide and improve customer support for non-Experian customers.**

## Public Interest

**To use special category data in order to generate insurance quotations** - where we collect special category data (such as information relating to health) and criminal conviction or offence data for the purposes of providing motor insurance quotations, we process this data for the purposes of arranging your insurance and because it is necessary in the substantial public interest to do so. We will also need to share this data with the insurers, brokers and aggregators for insurance purposes so that we can arrange your insurance for you. These third parties need this information to enable them to generate quotes.

It may also be necessary for us to retain a copy of any special category data and criminal conviction or offence data for the purpose of making or defending claims or preventing or detecting crime, including fraud.

## Who we share your personal information with

We share your personal information 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:

- the Experian Credit Bureau (who may pass this on to Experian Marketing Services);
- companies within the Experian group who manage some parts of the services for us;
- suppliers who provide services to us which require access to your personal information; and
- 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. Additional Experian business functions

### - Experian Credit Bureau

Personal data that you provide during registration (as described in the section '**What information we collect**') is shared with Experian's Credit Bureau for the purposes of improving data accuracy and completeness. The Experian Credit Bureau may subsequently provide your data to Experian Marketing Services Please see Section 4 'What kinds of personal data to credit reference agencies hold, and where do they get it from?' of the [CRAIN](#) for further information.

### - Experian Marketing Services

As described in the section '**Scope of this privacy policy**', Experian Marketing Services also receives some personal data from Experian's Credit Bureau, which was originally collected under this policy and during your registration for our services Please see the 'Credit Activity Data' section of the [CIP](#) for further information.

### - Experian Pre-qualification Service

Personal data that you provide during registration (limited to your date of birth, surname, postcode and an internal ID) is shared with Experian's Pre-qualification Services if you opt into Experian Boost. This is to ensure that a summary of your bank information is taken into consideration if you use another price comparison site or directly request a quotation or eligibility rating from a participating lender (who use Experian's Pre-qualification services).

## 2. 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.

## 3. 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.

## 4. 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.

## 5. Fraud prevention agencies

The personal information we have collected from you will be shared with fraud prevention agencies who will use it to prevent fraud and money-laundering and to verify your identity. Law enforcement agencies may access and use this information.

If fraud is detected, you could be refused certain services, finance, or employment. Further details of how your information will be used by us and these fraud prevention agencies can be obtained on the Cifas website.

We and other organisations may access and use the information recorded by fraud

prevention agencies from other countries.

## **6. 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.

## **7. Brokers, lenders, Insurers, aggregators 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 prepopulating the application form on their website);
- contacting you regarding credit and financial products; and complying with any contractual, legal and/or regulatory obligations.
- providing analysis and insight (which will not include personally identifiable information) to help the lender, broker or insurer to improve the products and services that they offer to our customers

These firms may also receive summarised bank transaction data that we hold about you if you opt into our Experian Boost open banking service. The data will only be used as described in the Experian Boost part of the 'How we use your information' section of this privacy policy.

## **8. 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](mailto:uk.dpo@experian.com). You can also make changes to that preference in your Experian account. If the consent relates to cookies, you can withdraw or amend your consent by at any time by using the **"cookie settings"** link at the bottom of each page.

You can also ask for access to the personal information we hold about you by visiting <http://www.experian.co.uk/consumer/dataaccess>

You have the right to object to our use of your personal data. We will do as you ask where possible and in line with applicable law.

You also have the right to request that we correct any mistakes, restrict processing or delete your data. It's worth noting that in some cases if you do ask us to correct, delete or stop processing data, we won't always be required to do so. For example, some of the data we hold about you is data we have created from profiling activities to predict certain things about you, such as the data referred to in sections **'To provide the Experian Credit Score and send you credit score notifications', 'To provide services that use your open banking information' 'Marketing (including electronic marketing)'** in respect of the data we receive from Experian Marketing Services. This created data is not factual data, it is Experian's opinion and you do not have a right to correct it if you disagree with Experian's opinion. Where your rights don't apply, we will explain why. To use these rights contact contact us at [uk.dpo@experian.com](mailto:uk.dpo@experian.com)

The section **'Marketing (including electronic marketing)'** tells you how to opt-out of marketing.

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](mailto: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](mailto: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**

**Email:** [complaint.info@financial-ombudsman.org.uk](mailto:complaint.info@financial-ombudsman.org.uk)

**Website:** [www.financialombudsman.org.uk](http://www.financialombudsman.org.uk)

**Address:** 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. Previous versions of this privacy policy are available upon request.

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