

## Privacy Notice

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

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

When we refer to 'Experian Ireland' or 'we' in this Privacy Notice, we mean Experian Ireland Limited trading as Experian Ireland, a company registered in Ireland with company number 273857. Our Registered Office is at Newenham House, Northern Cross, Malahide Road, Dublin 17, Ireland.

You can check this by visiting the Companies Registration Office website at <https://search.cro.ie/company/CompanySearch.aspx> and searching the register. Our VAT registration number is 8273857L.

Experian Ireland Limited is regulated by the Central Bank of Ireland. Experian Ireland Limited is an account information service provider authorised for the provision of Account Information Services, with reference number C223438. You can check this by visiting the Central Bank of Ireland's (CBI) website (<http://registers.centralbank.ie/>) and searching the CBI's Register.

Experian Ireland Limited 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).

Experian Ireland Limited is responsible for processing the personal information and, where you are using the Account Information Services in the course of your business, trade or profession, business information, that is provided to us when using the Experian Ireland's Account Information Service until we consolidate your information and make the Transaction Details (as defined in the Service section immediately below) available to the Product Provider (lenders, financial institutions, or other service providers at which point they become responsible. Where you are using the Account Information Services in the course of your business, trade or profession, references to personal information may include business information.

If there's anything you're unsure about in this Privacy Notice, feel free to contact our Data Protection Officer at [dpoireland@experian.com](mailto:dpoireland@experian.com) or by telephone on +353-1-8469200.

### Service

Any references to the 'service' in this Notice means the Experian Ireland's account access service where we collect information from your selected bank(s) ("your bank(s)") including all details of transactions as provided by your bank(s) ("Transaction Details"), consolidate your information and provide the Transaction Details to your Product Provider. All of the services detailed in this paragraph (including the consolidation of your information and provision of the Transaction Details to the

## What information we collect

We will need to ask you for certain personal information to give you the best possible experience when you use this service. How we use the information we collect is explained in the 'How we use your information' section of this Notice.

We or our third parties will also collect other information about you and the devices you use to access our website. We do this by using technologies like cookies. See also our Cookie Policy <https://www.experian.ie/>

### CONTACT INFORMATION

To provide this service to you, we will collect some or all of the following:

Full name  
Date of birth  
Residential address  
Email address  
Mobile phone number

Where you are using the Services in the course of your business, trade or profession, we will also collect some or all of the following:

Business name  
Business registration number (if any)  
Business address

We'll keep it for no longer than 6 years from the date we provide the service for the purposes we explain in the 'How we use your information' section of this Notice.

### BANK ACCOUNT INFORMATION

Where you give your consent as part of the account information service journey, we will collect some information from your selected bank(s) so we can identify your income and expenditure.

So we can collect this information we will access your bank account(s) to obtain your bank account information. To do this we use the services of a technical enabler Salt Edge Inc ([www.saltedge.com](http://www.saltedge.com)) as part of our solution.

We will collect some or all of the following:

- Account information (including account number, type, currency and balance)
- Account holder information (including name, address, email and phone number)
- Any other names linked to your account
- Details of incoming and outgoing transactions for the period of time for which your bank makes these available (note that this will be a period of time immediately prior to the point at which your account is accessed, and you should contact your bank to confirm what this is) (including transaction amount, date, description, location, payee and currency)

Your bank account information will only be collected once and will not be collected again without your permission. Information you provide and the bank account information obtained from your bank account providers will not be kept by either us or our Supplier after we have provided the service, except on back-up servers for a period of one month after collection of the bank account information.

Your consent to access your bank account information will be kept by us for no longer than 6 years from the date of collection. Our supplier, Salt Edge Inc, may retain your IP address and IBAN (if collected) in technical and audit logs for no longer than 5 years from the date of collection (unless it is required by law to retain them for longer). However, we won't have access to the online banking log in details you provide.

As part of providing this service, our supplier Salt Edge Inc will also collect and retain information generated during the account information service journey, being (i) ancillary information, usage data, service data, relationships, trends, metrics, technical logs and technical information (for example your IP address, geolocation data and device information) and (ii) a chronological set of records that set out the sequence of activities in each communication session with your bank(s).

## How we use your information

We use your personal information to make our products and services as effective as possible.

### PURPOSE

We will only use your bank account information to provide the service or were stated in the **FIND OUT MORE** section below. We and our supplier Salt Edge Inc use the information generated during the account information service journey for the purposes set out in the FIND OUT MORE section below.

### FIND OUT MORE

#### To provide this service and to enable you to use it

We will use your information to provide the Experian Ireland account access service. This includes obtaining your bank account information from the bank(s) you have selected, consolidating your information and making it available to Product Provider. Product Provider's privacy notice will confirm how it will use your information (including categorisation) and who it will pass your information to. Where we use Salt Edge Inc. to obtain your bank account information for us, they will not use it for any other purpose without your permission. Salt Edge will use the ancillary information collected to improve, monitor and track performance of their services.

#### 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 information to the extent required to enable us to comply with these requirements.

#### For customer service, complaint handling 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 or ask us a question about the service we have provided to you, we will use your information (including where required your bank account information) to help us answer your question and handle your complaint.

## What are the legal grounds for handling personal information?

### Contract

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.

### Legitimate Interests

We can use personal data where the benefits of doing it are not outweighed by your interests, fundamental rights or freedoms. The law calls this the “Legitimate Interests” condition for processing.

To enable us to answer any questions you may have about the service or to handle your complaint, we rely on legitimate interests.

To confirm your identity and to verify any of the information you have provided we rely on legitimate interests

To process any information which relates to third party/ silent party data which is included within the bank account information we rely on legitimate interests.

For the investigation, detection and prevention of crime including fraud we rely on legitimate interests.

### Consent

You will be asked to provide your explicit consent for the transfer of your bank account information to your Product Provider. If you choose not to give your consent, this will affect our ability to provide your bank account information to your Product Provider. The consent is covering just the exact transfer of information to your Product Provider and cannot be withdrawn, because the data will be transfer straight away after you provide your consent. Please contact your Product Provider in case you no longer wish them to use the information.

### Compliance with Legal Obligations

We process your personal information where it is necessary for us to do so in order to comply with legal obligations which we are subject to.

## 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 service to you. We also share it with companies within the Experian group who manage some parts of the services for us.

### Our suppliers and client partners using this service

We will share your information with third party suppliers who provide services to us (such as Salt Edge Inc.); Experian Group companies who provide services to us and with our Product Provider. Product Provider’s privacy notice will confirm how it will use your information (including categorisation) and who it will pass your information to.

## Where in the world do we send information?

Experian Ireland are based in Dublin, Ireland. The Experian Ireland account information service is hosted in Frankfurt, Germany. We 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 information safe, we apply strict safeguards when transferring it overseas. For example:

- 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
- 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, or
- Sending your personal information to a member organisation approved by the European Commission as providing a suitable level of high-quality protection.

## Your rights to how we use your personal information

You can 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. We will assess your request and subject to legal or overriding requirements to keep it we will act on your request, but please note that this does not mean that we will delete negative information about you if it is confirmed to be correct.

To request a copy of the personal information we hold about you, please follow this <https://www.experian.ie/legal/privacy-policy/open-banking-support>

In certain circumstances (e.g. where the processing of it 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 automated means. If you would like more information about this, let us know by contacting our Data Protection Officer at [dpoireland@experian.com](mailto:dpoireland@experian.com) or by telephoning +353-1-8469200

## Problems with how we handle your information or rights

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 with regard to how we process your personal information, please let us know by contacting our Data Protection Officer (Jennifer Crama) at [dpoireland@experian.com](mailto:dpoireland@experian.com) or by telephoning +353-1-8469200.

You may also visit <https://www.experian.ie/legal/privacy-policy/open-banking-support> to understand how to make a complaint.

You also have the right to contact a data protection supervisory authority. In Ireland, the data protection supervisory authority that regulates the handling of personal information is the Data Protection Commission. You can contact them by:

1. Going to their website at [www.dataprotection.ie](http://www.dataprotection.ie)
2. Phone on +353 578 684 800 and +353 761 104 800
3. Post to the Data Protection Commission, 21 Fitzwilliam Square South, Dublin 2, D02 RD28, Ireland.

## 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 Ireland must comply with a comprehensive Global Security Policy based on internationally recognised security standards (ISO27001:2013) and holds individual ISO27001 certificates for both the Global Security Administration team and the UK Data Centres.

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

Experian Ireland (as part of a wider audit of Experian Group) is annually audited by an External QSA (Qualified Security Assessor) from Trustwave and has successfully maintained compliance since 2010.

## How long we keep your personal information for

We'll keep your personal information for the periods set out in the section '**What information we collect**' above and we will only keep it for as long as we need it to provide the service. We may also keep it to comply with our legal obligations, resolve any disputes and enforce our rights.

## Changes to this Privacy Notice

We can update this Privacy Notice 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 Notice or how we use your information we'll let you know and where appropriate ask for your consent.

## Contact Us

Call us on or email our Data Protection Officer (Jennifer Crama) at [dpoireland@experian.com](mailto:dpoireland@experian.com) or by telephoning +353-1-8469200.