# **Experian Velocity Portal Privacy Policy**

### This policy

We take your privacy seriously. This Privacy Policy explains what personal information we collect from you 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 <u>www.experianplc.com</u>.

Experian is responsible for processing the personal information you provide to us for the usage of our Velocity Portal (or was provided to us as part of enabling you to access the product) and where it is a requirement under English Law, Experian will maintain its registration with the Information Commissioners Office in the UK.

If there's anything you're unsure about in this Privacy Policy, feel free to contact our Data Protection Officer at <u>UK.DPOBusinessEnquiries@Experian.com</u>.

### 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 website) and when you use our products and services.

We or our third parties will also collect other information about you and the devices you used to access our website. We do this by using technologies like cookies. See also, our Cookie Policy <u>here</u>.

See below for the types of personal information we will ask for or collect.

### **Contact Information**

When you or your organisation request access to our products we will ask you to provide some contact information. Contact information include the following:

- 1. Business Name
- 2. Business Address
- 3. Contact Name
- 4. Contact Business Telephone Number
- 5. Business Email address

We will only retain your Contact Information for 120 days after the end of the provision of the services (last log in date).

### **Security Details**

For most of the services you select 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:

- Username
- Password

We will only retain your Security information for 120 days after the end of the provision of the services (last log in date).

### **Device Information**

We may collect certain data automatically, both ourselves or via third parties, from your visit to our website or use of our services, which include the following:

• How you connect to the internet (IP Protocol Address) and how you engage with our site

We will only retain your Device information for up to 2 years after the end of the provision of the services.

### How we use your information

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

See below on what we will use your personal information for.

### To enable you to access our Velocity Portal 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 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).

### For fraud investigation, detection and prevention

We will 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).

### For the investigation, detection and prevention of crime

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

### 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.

### 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.

## 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 here. 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**

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 data subjects. The law calls this the "Legitimate Interests" condition for processing. E.G:

• 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.

### 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;

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.

See below for more about who and why we share your information with others.

### 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 several service providers to support our business and these service providers may have access to our systems to provide services to us and/or to you on our behalf.

This includes Avco Systems Ltd, who provide identity management services that control user access to Experian's Velocity Portal. Avco Systems Ltd is data controller for the identity management services they provide and details of how they process your personal data is available on their <u>privacy policy</u>.

### 3. Fraud prevention agencies

We may 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:

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 and other law enforcement agencies, as well as public bodies such as local and central authorities can sometimes request personal information. This maybe 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. 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.

See below for more about where we send your information and how it is protected.

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

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

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.

Still want to know more about the safeguards we use to protect your personal information overseas? Feel free to contact our Data Protection Officer at <u>UK.DPOBusinessEnquiries@Experian.com</u>.

### Your rights to how we use your personal information

If our right to process or share your personal information is based on the fact that you've given us consent, you have the right to withdraw that consent at any time by contacting us.

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. We will assess your request and subject to legal or overriding requirements to keep it we will act on your request. To request a copy of the personal information we hold about you, please follow this <a href="https://www.experian.co.uk/consumer/data-access">https://www.experian.co.uk/consumer/data-access</a>.

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 automated means. If you would like more information about this, let us know by contacting our Data Protection Officer on <u>UK.DPOBusinessEnquiries@Experian.com</u>.

#### 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, please let us know by contacting our Data Protection Officer at UK.DPOBusinessEnquiries@Experian.com. You may also see our full complaints handling procedure here 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: 03001239123, or from outside the UK +44 20 7964 1000 E: <u>mailto:complaint.info@financialombudsman.org.uk</u> W:www.financial-ombudsman.org.uk Financial Ombudsman Service Exchange Tower London E14 9SR

You also have the right to contact the Information Commissioner's Office (ICO), the supervisory authority that regulates the 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 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.

See below on more about our safeguards and security measures for handling your information.

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. We restrict access to your personal data to those employees, and third parties, who need to know that information to provide products or services to you. We maintain physical, electronic, and procedural safeguards to protect your personal data.

Experian protects your information over the Internet by using secure web server technologies, which allows web browser programs (such as Microsoft Internet Explorer) to interact with Experian's web server via an encrypted session. Experian employs a Secure Sockets Layer (SSL) connection that provides an encrypted connection between your computer and Experian. The 128-bit encrypted connection scrambles ordinary text or data into cypher text to safeguard sensitive information during its journey across the Internet. The information is decrypted, or put back into a readable format, when it reaches its intended destination. When you visit any Experian website you may move in and out of secured areas. Any time that you are on a registration page or viewing your personal credit report, you will be in a secured area.

### 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 where we were not able to give a specific period, we will keep it only if 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.

See below for more details about the logic behind how long we keep your information.

### **Contact Information**

Contact information such as names and addresses are kept while there is a continuing need for us to have it.

### **Security Details**

Security check information such as username and password are kept while there is a continuing need to retain it.

### **Device Information**

Device information such as how you connect to the internet and screen resolution are kept while there is a continuing need to retain it.

### **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.