

**USE OF PERSONAL INFORMATION – PRIVACY NOTICE**

We, Accolade Education Finance Ltd, are a registered company in England (Company no. 11044231) and are registered with the Information Commissioner's Office (ICO) under registration number Z8583502. This privacy notice explains what data We hold about You and how We plan to use it. It also sets out Your legal rights under Data Protection laws. In this respect, we are the data controller of data We hold about You.

INTRODUCTION

Before We are able to complete the application process and provide financing to You, We use the data You provide directly to Us, or via Your intermediary in conjunction with data shared with credit reference agencies (CRAs), anti-fraud and anti-money laundering agencies, and data collected from publicly available sources (e.g. electoral register) for the following purposes:

- (i) to verify Your identity;
- (ii) to verify Your credit history and take credit decisions;
- (iii) to prevent, detect and prosecute fraud, terrorism and money laundering;
- (iv) to manage Your account; and
- (v) to recover and trace debts.

These checks require Us to process personal data about You.

WHAT WE PROCESS AND SHARE

The personal data You have provided, We have collected from You, or We have received from third parties (such as the person who introduced Your application to us, credit reference and fraud prevention agencies, debt recovery agencies) may include Your:

name
date of birth
residential address and address history
contact details such as email address and telephone numbers
financial information
employment details
identifiers assigned to Your computer or other internet connected device including Your Internet Protocol (IP) address
Your employee's contact details

CRAs collect and maintain information about consumers' and businesses' credit behaviour. This includes Electoral Register, fraud prevention, and credit information - including details of previous applications and the conduct of Your accounts - and public information such as County Court Judgements, decrees, and bankruptcies.

We use various CRA and head lessors, who will process Your personal data to verify Your identity and to assess credit worthiness. We will supply Your personal information to CRA's, who will give Us information about You. This will include information from Your credit application and about Your financial situation and financial history. CRA's will supply to us both public (including the electoral register) and shared credit, financial situation and financial history information and fraud prevention information.

We will continue to exchange information about You with CRA's while You have a relationship with us. We will also inform them about your settled accounts. If you borrow and do not repay in full and on time, CRA's will record the outstanding debt. This information may be supplied to other organisations by CRA's.

When CRA's receive a search from us they will place a search footprint on your credit file that may be seen by other lenders.

If you are making a joint application, or tell us that you have a spouse or financial associate, we will link your records together, so you should make sure you discuss this with them, and share with them this information, before lodging the application. CRA's will also link your records together and these links will remain on your and their files until such time as you or your partner successfully files for a disassociation with CRA's to break that link.

When We, CRAs and fraud prevention agencies process Your personal data, We do so on the basis that We have a legitimate interest in assessing credit worthiness before signing a contract with You, in preventing fraud, terrorism and money laundering, and in verifying identity, in order to protect Our business and to comply with laws that apply to Us.

The Government, through statute, also requires Us to screen applications that are made to Us to ensure We are complying with the international fight against terrorism and other criminal activities. As a result of this We may need to disclose information to government bodies.

Credit reference and fraud prevention agencies can hold Your personal data for different periods of time, and if You are considered to pose a fraud, terrorism or money laundering risk, Your data can be held for up to six years. We will not retain Your personal information for longer than is necessary for the maintenance of Your account, or for legal or regulatory requirements.

In addition to disclosure to the person who introduced Your application to Us, credit reference and fraud agencies, We may disclose Your personal data to comply with any legal or regulatory requirements to which We are subject, to other companies within Our group, to advisers, banks or to anyone We propose to transfer any of Our rights and/or responsibilities under any agreement We have with You, each of whom may use Your personal data in the ways described in this statement.

We will also process Your personal data in accordance with the contractual requirements of the services or financing You have requested.

We may monitor or record phone calls with You in case We need to check We have carried out Your instructions correctly, to resolve queries or issues, for regulatory purposes, to help improve Our quality of service, and to help detect or prevent fraud or other crimes. Conversations may also be monitored for staff training purposes.

AUTOMATED DECISIONS

As part of the processing of Your personal data, decisions may be made by automated means. This means We may automatically decide that:

- (i) You are not approved for credit or for the amount of credit applied for; or
- (ii) You pose a fraud, terrorism or money laundering risk if:
 - Our processing reveals Your behaviour to be consistent with that of known fraudsters, terrorists or money launderers; or is inconsistent with Your previous submissions; or
 - You appear to have deliberately hidden Your true identity.

If You submit an application and it is declined through this automated process, You can contact Us at Our contact details set out on this page, within 21 days to have the decision reconsidered. You also have the right to ask that the decision is not made based solely using a credit scoring system.

CONSEQUENCES OF PROCESSING

If We, a credit reference agency or a fraud prevention agency, determine either that You are not approved for credit or that You pose a fraud, terrorism or money laundering risk, We may refuse to provide the financing You have requested or We may stop providing existing services to You.

A record of any fraud, terrorism or money laundering risk will be retained by the fraud prevention agencies, and may result in others refusing to provide services, financing or employment to You. If You have any questions about this, please contact us using our contact details on this page.

We, credit reference agencies and fraud prevention agencies, may also, pursuant to statute, enable law enforcement agencies to access and use Your personal data to detect, investigate and prevent crime.

MARKETING

Where You have consented to Us contacting You by email, telephone, or post, We will send You details on existing or new products We are marketing to see if You are interested in these. You can withdraw Your consent to this method of marketing communication at any time. In order to do so, please contact Us using our contact details below.

ANALYSIS

We may use information relating to Your product, which may also include personal information about You for statistical analysis on how We perform as a business and to improve services provided to Our customers.

DATA TRANSFERS

Whenever We, credit reference or fraud prevention agencies transfer Your personal data outside of the European Economic Area, contractual obligations are imposed on the recipients of that data to protect Your personal data to the standard required in the European Economic Area. The recipient may also be required to subscribe to 'international frameworks' intended to enable secure data sharing.

YOUR RIGHTS

Your personal data is protected by legal rights, which include Your rights to:

- object to Our processing of Your personal data;
- request that Your personal data is erased or corrected;
- request access to Your personal data.

For more information or to exercise Your data protection rights, please contact Us using our contact details.

You also have a right to complain to the Information Commissioner's Office at: <https://ico.org.uk/> which regulates the processing of personal data.