



Northridge FINANCE

Data Privacy Notice

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At Northridge Finance we recognise that the way we use personal information plays an essential role in enabling our customers and communities to thrive. We take our management of your information very seriously and would like to make sure that you know what personal information we collect, how we use it and that you are aware of your rights in relation to its use. We therefore encourage you to read this privacy notice carefully.

If you provide us with personal information relating to another individual, for example whilst making an application for a joint account or whilst providing information relating to your business partner, you must also show them a copy of this privacy notice to ensure that they know what we are doing with their personal information.

If you have questions or queries about how we use your personal information our Data Protection Officer will be happy to help – please see our ‘Contacting our Data Protection Officer’ section for further details.

(i) Who we are

We are NIIB Group Limited trading as Northridge Finance and are part of Bank of Ireland Group plc. Your information is held by **Northridge Finance** a trading name of **NIIB Group Limited**, who is the Data Controller (registered with the Information Commissioner’s Office under registration number Z5760886) and a subsidiary of **Bank of Ireland (UK) plc**. NIIB Group Ltd, trading as Northridge Finance is incorporated in Northern Ireland. Registered Office: 1 Donegall Square South, Belfast, BT1 5LR. Registered Number: NI003721. Bank of Ireland (UK) plc is incorporated in England and Wales. Registered office: Bow Bells House, 1, Bread Street, London, EC4M 9BE, Registered Number: 7022885. Frequently used trading names and associated companies of Northridge Finance include Bank of Ireland (UK) plc, Bank of Ireland Commercial Finance, Bank of Ireland Global Markets, Marshall Leasing, and Banking 365. Northridge Finance is authorised by the Financial Conduct Authority, reference number 671302.

(ii) What personal information do we have

Most of the information we have is provided to us directly by you, however we also receive information about you indirectly from other sources and we produce some information ourselves, for example, information about the way you use our products and services. The information we collect will depend on the nature of the relationship you have with us, however we would like to reassure you that we only collect what is absolutely necessary to fulfil our contractual, legal and regulatory obligations or where you have given your consent or to support the legitimate business interests which we have outlined in this privacy notice.

The categories of information we collect about you are set out in Table 1.

Table 1

Categories	Examples of the information we may collect
Identification	Information to enable us to identify you such as name, date of birth, gender, national insurance numbers, passports, photo identification, telephone calls, marital status, login and subscription data, e.g. login credentials for Northridge online services. We may also collect online identifiers - please see our cookie policy for further details – www.northridgefinance.com/yourdata
Contact details	Information to enable us to contact you throughout the duration of your relationship with us. This may include postal address, telephone numbers, email address and preference information such as whether you have chosen to opt in to receive marketing notifications and how you would like to receive these.
Financial	To provide you with our products and services and to fulfil our regulatory obligations we process your financial information such as account details including account number and sort codes, International Bank Account Number (IBAN), transaction history including payee reference and Direct Debits, financial or other associations, employment status, income details, source of funds, credit reference information, risk rating information including scores, investigation information, for example due diligence checks, sanctions, anti-money laundering checks, detection of any suspicious and unusual activity.
Publicly available information or collected or received from other sources	On occasions we may collect and use information which has been made publicly available about you, for example to help verify your address or to trace you via trade directories, on line forums, websites, Facebook, Twitter, YouTube or other social media. Information you've asked us to collect for you, for example information about other accounts or holdings with other companies, information that helps us combat fraud, information from your credit broker or motor dealer.
Call recordings, online chats and other communications	We monitor and record our conversations when we speak on the telephone or through any online webchat. We will have information that you have provided to us when filling in forms, making a claim or when communicating to us whether that is in person, by letter, email, online or otherwise.
Special category data & criminal convictions	On occasion we collect and use sensitive or special category information. This may include information about your race, ethnic origin, political views, religious beliefs, trade union membership, genetics, biometrics, health, sex life, or sexual orientation.

(iii) Joint Applicants and Associated Parties

If you make a joint application or an application on behalf of a business or other organisation we will also collect the personal information mentioned throughout this privacy notice from all other applicants /parties. You must provide a copy of this privacy notice to all applicants / parties before sharing their information with us.

When you open a joint account or product, this may mean that your information will be shared with the other applicant(s). For example, transactions made by you can be seen by your joint account holder and vice versa.

In respect of joint accounts (or business / other organisational accounts) and products, we will treat any instruction or consent received from an individual account holder as an instruction or consent on behalf of all account holders / parties, until such time as we are told otherwise. If any consent provided is withdrawn, it will be withdrawn on behalf of all of you.

For this reason, we suggest that all account holder(s) / parties discuss any decisions as to account management or account information together prior to making any changes, so that you each maintain full awareness of the treatment of all your personal information.

If you are married or financially linked to another person in the context of a particular product or service, a financial association may also be created between your records and theirs, including any previous and subsequent names used by you (for example, if you apply jointly or one is guaranteeing the debts of another). This means that we may treat your financial affairs as affecting each other. These links will remain on your and their files until you or they break that link. We will make searches on all joint applicants and evidence of that search will be left on all applicant records. The personal information you have either provided, we have collected from you or we have received from third parties for a joint Account will also be used to prevent fraud and money laundering, and to verify the identity of each applicant.

(iv) How we use your information and the legal bases for doing so

Before using your information we always ensure we have a valid reason, known as a 'lawful basis' for doing so.

Below you will find an explanation of the different lawful bases we rely on and the reason for their use.

(a) Consent:

Where we have your consent we will:

- Engage in electronic direct marketing;
- Undertake profiling of your information to allow us to automatically evaluate, analyse and predict various behaviours, preferences and situations – more information is provided under the 'Automated decision making & profiling section';
- Apply data analytics solutions to your information to help us make informed business decisions such as how to improve the quality of a service we provide to you, your financial needs, detecting and identifying fraud. .
- Process sensitive or special category data where there is no other applicable lawful basis.

If this applies to you we will explain how we would like to use your information and what we will do with it before we ask for your consent

(b) Contractual:

Prior to entering into an agreement or contract and while the contract is in place we will use your information to assess and provide the products and services you have requested. This includes:

- Providing a quote before a contract is issued
- Assessing and Processing applications for the products and services we offer.
- Administering existing products or services you have with us.

- Providing servicing communications to you such as changes in the terms and conditions of our products and services – these communications are separate from any marketing communications which we only issue if we have obtained your consent.
- Conducting credit reviews when you have applied to use one of our credit facilities. We use Credit Reference Agencies to search for details relating to your credit history e.g. credit scores. Where we make these searches the Credit Reference Agencies may keep a record of the search even if the application does not proceed. This record will be available to other organisations and could affect your ability to get credit elsewhere for a short period of time – further details can be found in our “Automated Decision Making” section.

If you are making a joint application your information will be linked to the other applicants by the Credit Reference Agencies. The association created between applicants will remain in place until you or another applicant is successful in asking the Credit Reference Agency for the link to be removed. Details of the credit references agencies we use are provided in the table 2 below.

Table 2

Credit Reference Agencies	Contact Details	Privacy Notice
Equifax Ltd www.equifax.co.uk	Customer Service Centre, PO Box 10036, Leicester, LE3 4FS	www.equifax.co.uk/crain
Experian Ltd www.experian.co.uk	Consumer Help Service, PO BOX 8000, Nottingham, NG80 7WE	www.experian.co.uk/crain
TransUnion International UK www.transunion.co.uk	One Park Lane, Leeds, West Yorkshire, LS3 1EP	www.transunion.co.uk/crain

(c) Legitimate interest:

We use your information to support the day to day administration of our business and to identify and pursue new business opportunities. This includes:

- Preventing and detecting suspicious or fraudulent activities.
- Informing Credit Reference Agencies about the performance and management of your account and your dealings with us including details of credit facilities and credit history with us. We may also tell them of any defaults and any change of address.
- Carrying out relevant marketing and promotional activities where we have obtained your consent.
- Developing and improving our products and services through activities such as reviewing customer feedback and assessing how you use our products and services.
- Monitoring and reviewing call recordings, online chats and other business activity for quality assurance, training and compliance purposes.
- Testing and validating the effectiveness of products, services and system enhancements (for example changes to our application and/or account management systems).
- Performing audit, statistical or research activities (including anonymising your information) to help us understand trends in our customer behaviour including how products and services are used to help us;
 - Improve the products and services we offer our customers, colleagues and communities;
 - develop products and services that better meet our customer’s needs and behaviours; and
 - understand and manage our risks better.
- Collecting and managing debt.
- Tracing you where we have a legitimate reason for doing so e.g. debt collection.

- Carrying out profiling that does not have a legal or other significant effect on you, please see the section 'Automated decision making & profiling' for more details.
- Assisting Northridge Finance's parent company, the Bank of Ireland Group plc with any proposed sale, merger or acquisition of the Group's assets. We will only disclose your personal information if the third party agrees to keep it confidential and to use it only to consider the possible transaction. If the transaction goes ahead, the buyers, transferee or merger partner may use or disclose your personal information in the same way as set out in this notice.
- Managing and administering the Northridge's legal affairs.
- Supporting the Northridge's strategic planning and portfolio management through activities such as financial, regulatory and risk reporting.
- Supporting the management of our information security and network controls with the aim of preventing cyber-attacks, unauthorised access and other criminal activities.
- Combining information from different sources to better understand any risks to Northridge or Bank of Ireland Group, serve your needs and understand more about you.
- Where it may be in the interest of someone other than yourself

(d) Legal obligations:

To provide the product and services you have requested we need to use your information to comply with our legal and regulatory obligations, for example:

- Confirming your identity.
- Sharing your information with law enforcement agencies, tax authorities and other regulatory bodies.
- In relation to legal claims which may be your own, ours or third parties
- Complying with our obligation to provide access to your account information where you or your joint account holder has instructed an Account Information Service Provider (AISP), a Payment Initiation Service Provider (PISP), or Credit Based Payment Instrument Issuer (CBPII) to access the information.
- Screening applications and monitoring accounts to identify criminal activity such as fraud, terrorist financing, bribery, corruption and money laundering. If our searches identify or raise suspicions of fraudulent activity we will pass your information to fraud prevention agencies. These agencies will use your personal information to prevent fraud and money laundering and to verify your identity. If fraud is detected you can be refused certain services, finance or employment. Further details of how your information will be used by fraud prevention agencies and your data protection rights can be found in section (e) below ('Fraud Prevention'). The Fraud Prevention agencies we use are detailed in Table 3

Table 3

Fraud Prevention Agencies	Contact Details	Privacy Notice
Cifas www.cifas.org.uk	Consumer Affairs, 6th Floor, Lynton House, 7-12 Tavistock Square,	www.cifas.org.uk/fpn

London, WC1H 9LT		
National Hunter www.nhunter.co.uk	PO Box 4744, Stone, Staffordshire, ST15 9FE	www.nhunter.co.uk/privacy policy

(e) Fraud Prevention

Before we provide services, goods or financing to you, we undertake checks for the purposes of preventing fraud and money laundering, and to verify your identity. These checks require us to process personal data about you.

The personal data you have provided, we have collected from you, or we have received from third parties will be used to prevent fraud and money laundering, and to verify your identity. Details of the personal information that will be processed, for example: name, address, date of birth, address, contact details, financial information, employment details, device identifiers including IP address and vehicle details.

We and fraud prevention agencies may also enable law enforcement agencies to access and use your personal data to prevent, detect and investigate crime.

We process your personal data on the basis that we have a legitimate interest in preventing fraud and money laundering, and to verify identity, in order to protect our business and to comply with laws that apply to us. Such processing is also a contractual requirement of the services or financing you have requested.

Fraud prevention agencies can hold your personal data for different periods of time, and if you are considered to pose a fraud or money laundering risk, your data can be held for up to six years.

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 you pose a fraud or money laundering risk or if our processing reveals your behaviour to be consistent with that of known fraudsters or money launderers, or is inconsistent with your previous submissions, or you appear to have deliberately hidden your true identity. You have rights in relation to automated decision making - if you want to know more please contact us using the details above.

Consequences of processing

If we, or a fraud prevention agency, determine that you pose a fraud or money laundering risk, we may refuse to provide the services and financing you have requested, or to employ you, or we may stop providing existing services to you.

A record of any fraud 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 the fraud prevention agency using the contact details in Table 3.

Data transfers

Whenever fraud prevention agencies transfer your personal data outside of the European Economic Area, they impose contractual obligations on the recipients of that data to protect your personal data to the standard required in the European Economic Area. They may also require the recipient to subscribe to 'international frameworks' intended to enable secure data sharing.

Please note National Hunter rules currently do not allow for processing National Hunter data outside of the European Economic area

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 the fraud prevention agency using the contact details in Table 3.

You also have a right to complain to the Information Commissioner's Office which regulates the processing of personal data.

(f) Public interest:

On occasion we may process your information where it is necessary for reasons of substantial public interest and/or for employment, social care and social protection such as:

- Where we need to provide support for individuals with a particular disability or medical condition or if you are a vulnerable customer;
- Safeguarding children and individuals at risk including the economic well-being of certain individuals;
- Protecting the public against dishonesty, including preventing and detecting unlawful acts;
- Complying with Government and regulatory Codes of Practice;
- We may share your personal information with other people and organisations such as members of our Group, your relatives, social services, your carer, or the person who has power of attorney over your affairs or a court of protection order if it is reasonable to do so.

(g) Vital interests:

In exceptional circumstances we will use and/or disclose information we hold about you to identify, locate or protect your vital interests or those of another individual.

(v) Automated decision making & profiling

When you make an application for the credit products and other financial services we use automated decision making tools known as credit scoring to determine whether to extend or deny credit.

When assessing your application credit scoring will consider three sources:

1. The information provided as part of your application by you or by a broker or motor dealer.
2. Information provided by credit reference agencies.
3. Information that may already be held about you by companies within the Bank of Ireland Group plc.

If you submit an application to us and it is subsequently declined through this automated process, you can contact us within one month of your receipt of our decision and request we reconsider our decision. You also have the right to ask that the decision is not made based solely using a credit scoring system.

Throughout the duration of your relationship with us we may also use another form of automated decision making known as profiling.

Profiling the information we hold about you enables us to evaluate, analyse or predict your economic situation, preferences, reliability, behaviour, location. For example we may profile your information:

- To assess your transaction history and/or current repayments and/or account balances to predict when you might want to consider a credit product.
- To analyse the frequency of your use of online services or mobile banking to tailor our methods of communication with you subject to data protection and privacy legislation or any marketing preferences you have expressed.

With the exception of credit scoring that we use to enter into a contract with you or to monitor your ongoing credit status we will not use profiling to make a decision about you that has a legal or other significant effect on you without your explicit consent.

You may ask us not to make decisions about you that are based solely on automated processing. If you do this, you may not be offered some products or services that we might otherwise have offered

(vi) Who we share your information with

On occasions we may share your information with other members of the Bank of Ireland Group and external third parties. We only share your information where we have a legal basis for doing so and only if the third party agrees to manage your information in line with our own data privacy standards.

The types of organisations we share your information with are outlined in the table 4.

Table 4

Categories	Description
Members of the Bank of Ireland Group	We may share your information with other members of the Bank of Ireland Group plc.
Our Business Partners	We work in close partnership with the Post Office, AA Financial Services and First Rate Exchange Services to offer a range of products. We therefore share your information with these organisations in line with our terms and conditions.
Brokers and Dealers	Some of our products are offered through a dealer or broker. We will share information with your broker or dealer.
Insurers	Where applicable and as part of the servicing of your contract, information will be shared with the insurer of goods subject to a Northridge Finance contract
Guarantors	We will share your information with any Guarantor of your liabilities to us.

Categories	Description
Service Providers	<p>To support the products and services we offer we may use service providers to process information on our behalf. These include but are not limited to organisations which provide us with:</p> <ul style="list-style-type: none"> • Keepers of asset registers • Document storage, destruction , archiving and printing facilities • Consultancy services e.g. legal advisors, medical advisors, property surveyors, conveyancers, researchers, vehicle inspection services • Market research and analysis companies • Marketing companies • Payment facilitators • Analytics companies • Investment companies • Software development contractors • Data processors • Computer maintenance contractors • Courts and Court-appointed persons/entities, • Receivers, liquidators, examiners, official Assignee for Bankruptcy and equivalent in other jurisdictions • Debt collection agencies, budgeting and advice agencies, tracing agencies • Business partners and joint ventures • Member companies of the Finance and Leasing Association • Rating agencies • Healthcare professionals • Business associates and other advisers • Financial organisations • Credit reference agencies • Trade associations and professional bodies • Central and local government • Pension fund administrators • Persons making an enquiry or complaint • Police forces and security organisations, ombudsmen and regulatory authorities • Fraud and financial crime prevention agencies • Suppliers of credit to which facilities management services are provided • Credit bureau • Insurers and re-insurers • Brokers or dealers who introduced you to us or third parties acting on their behalf

Categories	Description
Law enforcement and regulatory bodies	On occasions we may be required to share your information with law enforcement agencies and regulatory bodies. This is to support the prevention of crime and to enable us to meet our legal and regulatory requirements. This may include organisations such as: <ul style="list-style-type: none"> • Police • Fraud prevention agencies • Her Majesty's Revenue and Customs (HMRC) • Financial Conduct Authority • Prudential Regulation Authority • Financial Services Compensation Scheme • Information Commissioner's Office
Credit Reference Agencies	When processing applications for one of our credit facilities we share your information with credit referencing agencies that will perform credit reviews. These agencies may retain a record of the search even if the application does not proceed. The credit reference agencies we use are Equifax Ltd, Experian Ltd, TransUnion International UK Ltd.
Third parties acting on behalf of the Bank of Ireland Group plc.	We may share your information with third parties connected with the sale, merger or acquisition of Northridge Finance or Groups assets.
Third parties acting on your behalf with your consent	We may share your information with third parties where you have provided us with your consent. This may include legal representatives, accountants, financial advisors, family members, Debt Counselling Services, Account Information Service Providers (AISP), Payment Initiation Service Providers (PISP) and Credit Based Payment Instrument Issuer (CBPII), other financial organisations, employers.

(vii) Consequences of not providing information

We will only collect information that is absolutely necessary to perform our contract with you, comply with our legal and regulatory obligations, where we have your consent or to protect the legitimate interests of our business. If you chose not to provide this information we may not be able to provide the products and services you have applied for.

(viii) What Rights do I have over my personal data?

Under data protection legislation, you have a number of rights including the right to:

- Ask whether or not we are using or storing your personal information and to ask for a copy of that information.
- Ask us to **rectify** inaccurate or incomplete information.
- Request human intervention if you disagree with any decision based solely on **automated processing**.
- **Withdraw your consent** for us using your information where processing was based on us obtaining your consent.
- Request we **erase** your information in certain circumstances.
- **Restrict** how we use your information in some situations.
- In some circumstances **object** to the way we process your information.
- On occasion request we **transfer** your information to another organisation.

Additional information on how you can exercise your rights can be located on our website www.northridgefinance.com/yourdata

If you are unhappy about the way we have used your information, please let our Data Protection Officer know so we can help put things right. You also have the right to raise a complaint with the data protection regulator, the Information Commissioner (ICO) www.ico.org.uk.

(ix) Transferring your data outside the UK and EEA

On occasions we may be required to transfer your personal information outside the UK and European Economic Area (EEA). Before doing so we will always ensure we have a lawful basis for transferring your details and that appropriate safeguards are in place to protect your information. You can find out more information on the safeguards we rely on by contacting our Data Protection Officer.

(x) How long do we hold your information?

We will only keep the information we collect about you for as long as necessary. The retention period will vary depending on the relationship you hold with us and any legal or regulatory obligation we must fulfil. The table below can be used to provide an indication on the typical timeframes we will hold your information for.

Source of information	Retention period
Enquiries / Applications where accounts are not opened	4 years
Account details	7 years post account closure
Complaint records	7 years
Direct Debit Details	Indefinitely

In exceptional circumstances we may need to retain your information for longer periods, for example whilst supporting an investigation by a law enforcement agency.

Once we no longer need to retain your information we will ensure it is securely deleted, destroyed or completely anonymised.

(xi) Changes to our privacy policy

It may be necessary to update this Privacy Notice from time to time, however if that is the case we will notify you of any significant changes by post, SMS, e-mail, or when you log into online services. We will also ensure the most recent version of the privacy notice is available on our website – www.northridgefinance.com/yourdata.

(xii) Contact our Data Protection Officer

If you have any questions about how we use your information please let our Data Protection Officer know by either emailing boiukdataprotectionofficer@boi.com or writing to:

Northridge Finance - Data Protection Officer
PO Box 3191
1 Temple Quay
Bristol
BS1 9HY

(xiii) Other Privacy Notices you should read

Ensure you read the Privacy Notices issued by Credit Reference Agencies and Fraud Prevention Agencies. You can also access their Privacy Notices at their websites. Please see the sections “How we use your information and the legal bases for doing so” [section (iv) b] and “Legal obligations” [section (iv) d] above. You can also access their Privacy Notices via the ‘Your Data’ section of our website www.northridgefinance.com/yourdata

If you were introduced to us by a broker or other intermediary, ask your broker or other intermediary, such as a motor dealer, for a copy of its own Privacy Notice if you have not already seen it. You should also ask for a copy of the Privacy Notice of any third party product and service providers you contract with.

(xiv) Business Products Only

We may search the records of business data held by credit reference agencies designated by the Treasury under the power conferred by the Small and Medium Size (Credit Information Regulations 2015) and give those credit reference agencies information about your business accounts. Business data held by the credit reference agencies may be shared with other organisations authorised by you.