

WELCOME FINANCIAL SERVICES LIMITED WEBSITE PRIVACY NOTICE (GDPR VERSION)

INTRODUCTION

Welcome to the Welcome Financial Services Limited privacy notice.

Welcome Financial Services Limited respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

Please use the Glossary to understand the meaning of some of the terms used in this privacy notice.

1. *IMPORTANT INFORMATION AND WHO WE ARE*
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1. **IMPORTANT INFORMATION AND WHO WE ARE**

PURPOSE OF THIS PRIVACY NOTICE

This privacy notice aims to give you information about how Welcome Financial Services Limited collects and processes your personal data through your use of this website, including any data you may provide through this website when you send us an email.

Welcome Financial Services Limited has issued a separate privacy notice for its current and former employees, workers and contractors, who should contact us to request a copy.

This is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

CONTROLLER

Welcome Financial Services Limited is the controller and is responsible for your personal data and for this website (and is collectively referred to as “WFSL”, “the Company”, “we”, “us” or “our” in this privacy notice).

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise *your legal rights*, please contact the DPO using the details set out below.

CONTACT DETAILS

Our full details are:

Full name of legal entity: Welcome Financial Services Limited

Name of DPO: Roland Todd

Email address: rolandtodd@cattles.co.uk

Postal address: Mere Way, Ruddington Fields Business Park, Ruddington, Nottingham, NG11 6NZ

Telephone number: 0333 999 9505

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO and so please contact us in the first instance.

CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

This notice was last updated on 25 May 2018 when the General Data Protection Regulation ((EU) 2016/679) came into effect.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

THIRD-PARTY LINKS

Our website includes links to third-party websites. Clicking on those links may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

(a) Current and former customers

We have collected, used, stored and transferred, and may collect, use, store and transfer, different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes your first name, last name, previous first name, previous last name, title and date of birth.

- **Contact Data** includes your current address, previous address, telephone numbers and email address.
- **Financial Data** includes your bank account and payment card details, your bank statements and details of your income and expenditure.
- **Transaction Data** includes your customer number, your account numbers, amounts lent to you, amounts repaid by you, your outstanding balance, your annual statements and any arrears, notices of sums in arrears, notices of default, notices of default sums and call recordings.
- **Verification Data** includes copies of your passport and driving licence and your national insurance number.
- **Property Data** includes your residential status and any mortgage account and Land Registry details and any vehicle registration number.
- **Employment Data** includes details of your employment.
- **Usage Data** includes information about how you use our website.

Except for details of the health conditions of certain current or former customers which we have collected and used, or may collect and use, for the purpose of assessing your ability to repay your loans and for details of days or times which we have collected and used, or may collect and use, for the purpose of determining when we should not attempt to contact certain current or former customers (which may give an indication of your religious beliefs) (where processing is necessary for the establishment, exercise or defence of legal claims (i.e. we can demonstrate that we have complied with the rules and guidance issued by our regulator, the Financial Conduct Authority)), we have not collected and will not collect Special Categories of Personal Data about you (this includes details of your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, genetic and biometric data and criminal convictions and offences).

- (b) **Creditors** (“Scheme Creditors”) whose claim against WFSL has been compromised by the WFSL Creditor Scheme of Arrangement which became effective on 2 March 2011 (the “Scheme”).

We have collected, used, stored and transferred, and may collect, use, store and transfer, different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes your first name, last name, previous first name, previous last name, title and date of birth.
- **Contact Data** includes your current address, previous address, telephone numbers and email address.
- **Financial Data** includes your bank account details.
- **Transaction Data** includes your reference number and details of your Scheme claim and of distributions paid to you under the Scheme.
- **Usage Data** includes information about how you use our website.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data and any information about criminal convictions and offences).

(c) **Suppliers**

We have collected, used, stored and transferred, and may collect, use, store and transfer, different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes your first name, last name, previous first name, previous last name and title.
- **Contact Data** includes your current address, previous address, telephone numbers and email address.
- **Financial Data** includes your bank account details and publicly available information in relation to your financial condition.
- **Transaction Data** includes your reference number, invoice and credit note numbers and details of your paid invoices and credited credit notes.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data and any information about criminal convictions and offences).

(d) **General**

We also collect and use **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

IF YOU FAIL TO PROVIDE PERSONAL DATA

(a) **Current customers**

Where we need to collect personal data under the terms of the contract we have entered into with you and you fail to provide that data when requested or appropriate (for example, you fail to provide us with your new address), we may not be able to perform the contract we have with you.

(b) **Former customers**

Where we need to collect personal data from you and you fail to provide that data when requested or appropriate (for example, you fail to provide us with enough data to investigate a complaint you wish to make about the contract which you had previously entered into with us), we may not be able to perform our legal obligation to investigate that complaint fully.

(c) **Scheme Creditors**

Where we need to collect personal data from you and you fail to provide that data when requested or appropriate (for example, you fail to provide us with your new bank details), we may not be able to perform our legal obligation to pay you distributions in accordance with the terms of the Scheme.

(d) **Suppliers**

Where we need to collect personal data under the terms of the contract we have entered into with you and you fail to provide the data when requested or appropriate (for example, you fail to provide us with your new bank details), we may not be able to perform our legal obligation to pay your invoices.

3. **HOW YOUR PERSONAL DATA IS COLLECTED**

(a) **Current customers**

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your updated Identity, Contact, Financial, Verification, Property and Employment Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - interact with us about the administration of your loan account; or
 - make a complaint to or a claim against us in respect of your loan account.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
 - **Identity, Contact, Financial and Verification Data** from solicitors, claims management companies or other representatives making a complaint to or a claim against us on your behalf in respect of your loan account;
 - **Transaction Data** from The Financial Services Compensation Scheme Limited (“FSCS”) or a third party acting on their behalf in relation to a complaint to or a claim against us in respect of your loan account;
 - **Contact Data** from an agent we have appointed to find your new address after we have not been able to contact you at the address we hold for you;
 - **Transaction Data** from third parties which we have appointed to collect amounts owing to us under the loan agreement which we have entered into with you; and
 - **Property Data** from Land Registries based in England and Wales, Scotland and Northern Ireland.

(b) **Former customers**

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your updated Identity, Contact, Financial and Verification Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you make a complaint to or a claim against us in respect of your loan account.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
 - **Identity, Contact, Financial and Verification Data** from solicitors, claims management companies or other representatives making a complaint to or a claim against us on your behalf in respect of your loan account;

- **Transaction Data** from the FSCS or a third party acting on their behalf in relation to a complaint to or a claim against us in respect of your loan account; and
- **Contact Data** from an agent we have appointed to find your new address after we have not been able to contact you at the address we hold for you.

(c) Scheme Creditors

We may receive your updated Identity, Contact, Financial and Transaction Data from the Scheme supervisors who instruct us as to the amount of distributions to be paid to the Scheme Creditors in accordance with the Scheme.

(d) Suppliers

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your updated Identity, Contact and Financial Data by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you interact with us about the payment of your invoices.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
 - **Identity, Contact and Financial Data** from publicly available sources such as Companies House in the UK; and
 - **Financial Data** from credit reference agencies based in the UK.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we have entered into with you.
- Where we need to comply with a legal or regulatory obligation.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We do not rely on consent as a legal basis for processing your personal data.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are (where appropriate).

You should note that we may process your personal data on more than one lawful basis depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal basis we are relying on to process your personal data where more than one basis has been set out in the table below.

(a) Current customers

Purpose/Activity	Type of data	Lawful basis for processing
To administer your loan agreement including: (i) collecting repayments owing to us (ii) sending you all notices and statements required by the Consumer Credit Act and the Financial Conduct Authority	(i) Identity (ii) Contact (iii) Financial (iv) Transaction (v) Verification (vi) Property (vii) Employment	(i) Performance of a contract with you (ii) Necessary to comply with a legal obligation

To respond to any complaints to or claims against us in relation to your loan agreement	(i) Identity (ii) Contact (iii) Financial (iv) Transaction (v) Verification (vi) Property	(i) Performance of a contract with you (ii) Necessary to comply with a legal obligation
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(b) Former customers

Purpose/Activity	Type of data	Lawful basis for processing
To respond to any complaints to or claims against us in relation to your loan agreement	(i) Identity (ii) Contact (iii) Financial (iv) Transaction (v) Verification (vi) Property	(i) Necessary to comply with a legal obligation

(c) Scheme creditors

Purpose/Activity	Type of data	Lawful basis for processing
To pay distributions in accordance with the Scheme	(i) Identity (ii) Contact (iii) Financial (iv) Transaction	(i) Necessary to comply with a legal obligation

(d) Suppliers

Purpose/Activity	Type of data	Lawful basis for processing
To order and pay for goods and services	(i) Identity (ii) Contact (iii) Financial (iv) Transaction	(i) Performance of a contract with you

(e) General

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To use data analytics to improve our website	(i) Usage	(i) Necessary for our legitimate interests (to improve our website)

MARKETING

We will not use your personal data for marketing and advertising purposes and you will not receive any marketing or advertising communications from us.

THIRD-PARTY MARKETING

We will not share your personal data with any company outside WFSL for marketing or advertising purposes.

COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly. For more information about the cookies we use, please see the Cookie Policy on our website.

CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- External Third Parties as set out in the *Glossary*.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions

6. INTERNATIONAL TRANSFERS

We do not and will not transfer your personal data outside the European Economic Area.

7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and the ICO of a breach where we are legally required to do so.

8. DATA RETENTION

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for your personal data are available in our retention policy which you can request from us by contacting us.

In some circumstances you can ask us to delete your data: see [*Request erasure*] below for further information.

9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data, such as to:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact us.

NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us to confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal

data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. GLOSSARY

LAWFUL BASIS

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party. This is especially relevant for current customers and suppliers.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to. Examples of this are our regulatory obligation to respond to complaints in relation to loan agreements and our legal obligation to pay distributions in accordance with the Scheme and to consider claims made against us in the Scheme Certified Liquidation which will conclude the Scheme.

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

EXTERNAL THIRD PARTIES

- Service providers acting as processors based in the United Kingdom who provide IT and system administration, debt collection and administration, mail fulfilment, storage and secure destruction services.
- Professional advisers (acting as controllers or processors) including lawyers, bankers and auditors who provide legal, banking and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal

data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. You should note, however, that we may not always be able to comply with your request for erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. You should note that this right will not be available to you because we do not carry out any automated processing of your personal data.

Withdraw consent at any time in the unlikely event that at any point in the future we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If at any point in the future we are processing your personal data on the basis of your consent and you then withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.