

Your Privacy Policy

1. Introduction

Please read this Privacy Policy carefully as it explains how RCI Bank UK and our related businesses within RCI Group (“we”, “our” or “us”) uses the personal information that you've provided or that we have obtained about you. The personal data that you provide (referred to as your “**information**” in this Privacy Policy) is data which by itself or with other data available to us, can be used to identify you.

RCI Bank is a trading name of RCI Bank UK Limited which is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority. Firm Reference Number 815220. RCI Bank UK Limited is registered in England and Wales, No. 11429127. Registered offices: Rivers Office Park, Denham Way, Rickmansworth, WD3 9YS. You can confirm our registration on the Financial Services Register. RCI Bank UK is part of the RCI Group of companies whose intermediate parent company is RCI Banque SA trading as “RCI Bank and Services” and whose ultimate parent company is Renault SA (all of which comprise the, “**RCI Group**” or “Group”). The RCI Group therefore includes, RCI Banque SA, RCI Financial Services Limited, RCI Bank UK and our ultimate parent company’s group of companies. If the RCI Group changes from time to time, we will inform you of any changes. If you would like more information on the companies that make up the RCI Group, please get in touch or go online to www.rcibs.com and www.group.renault.com.

From time to time, we may need to update or amend this Privacy Policy but we'll let you know of any changes to this Privacy Policy beforehand so you understand how your information is being used.

Please read this Privacy Policy in conjunction with the Privacy Statement, which you would have read when you made your application for an account with RCI Bank UK, as this explains how we use your information when you made the application.

The Website Privacy Policy on the website describes how RCI Bank uses the information collected about you (your “personal information”) when you visit this website (the “website”). Your personal data is data which by itself or with other data available to us, can be used to identify you.

2. What information do we collect?

When opening an account, it's important that you provide accurate information on your application.

We'll only process personal data you provide to us in accordance with the Data Protection Act 1998, the Privacy and Electronic Communications (EC Directive) Regulations 2003, (as updated from time to time) and other applicable privacy laws as amended from time to time. Whether you become a customer or not, we'll use your personal data for the reasons set out below and if you do become a customer, we'll use it to manage your account. Most of this information is directly collected when opening your account.

The categories of information that we may collect about you during your application for an account with RCI Bank UK are as follows: gender, title, full name (including any middle names), address, email address, telephone number, address history, date of birth, place of birth, nationality and bank details as well as tax residency information. We also ask you to provide memorable information to secure your account such as mother's maiden name. Your bank details help us to validate the information you have supplied and will be listed as your linked account (you can change this in future if you wish).

Providing some personal data in the application is optional. The mandatory and required information that we need from you is indicated by a star (*) in the application form. If you don't want to provide us with the required information then we will not be able to proceed with the identification and fraud prevention checks, subsequently, we will not be able to open an account for you. At the end of the application we will ask you to confirm your details and submit your application.

We may also collect information such as the date and time you used our services, website information, voice recordings made to our customer service centres and any other information or documentation (such as ID documents and proof of address) you provide. If you do not provide us with required information that we request from you as required to consider your application, we will not be able to proceed with the credit reference and fraud prevention checks described below and, subsequently, we will not be able to enter into an agreement with you. We may also receive information from third parties, suppliers and partners – such as the Third Parties named in this Privacy Policy – about the products and services you have purchased.

In addition to the information that you provide in your application, we may also collect information about you from enquiries we make (including from the searches we do with fraud prevention and credit reference agencies (“CRA”) and enquiries we may make internally, or with any other RCI Group company, about your performance of any other agreement you have with us or an RCI Group company).

We may also collect other information such as information you provide through customer surveys, feedback, complaints and correspondence or communications. Some information is required information but other information is optional and if you do not want to give it to us, you do not need to. We are always grateful for information you do provide though because this helps us to improve our products and services.

3. What do we do with the information we collect?

The purposes for which we use your information and the legal basis under data protection laws on which we rely to do this are as follows:

- It is necessary for the **performance of the contract** with you or to take steps to enter into one. This includes verifying your identity and assessing your application for an account (including fraud prevention checks) when you first enter into the contract and/or any subsequent applications, variations or modifications to the contract and administering the agreement between us and to provide you with the service under that agreement (i.e. managing your account, communicating with you, providing updates on the status of your account, dealing with any complaints and notifying you of any changes to this statement).
- It is necessary for our **legitimate interests** or that of a third party. This includes:
 - creating a profile to offer you tailored products and services for direct marketing purposes;
 - contacting you prior to the end of maturity of a fixed term account to discuss your options;
 - making available personalised offers and promotions to you;
 - identifying trends to develop new products and services;
 - advising you about the products and services that we provide to you in response to a request about this;
 - in some cases we may use automated methods to analyse, combine and evaluate information that you have provided to us (including the sharing of your personal information within our RCI Group of companies as mentioned in this Privacy Policy) which includes RCI Financial Services Limited;
 - collecting and analysing information so that we can deliver the most appropriate customer experience to you by tailoring and making relevant all our service and communications;
 - preventing fraud and money laundering, and to verify your identity, in order to protect our business and to comply with laws that apply to us;
 - for product development, statistical analysis and market research including customer surveys so that we can better understand you as a customer and provide tailored offers, products and services that we think will be of interest to you (we may want to contact you from time to time for market research, however you can ask us not to contact you for this purpose at any time);
 - providing you with customer support and services, including answering questions and responding to feedback and complaints;
 - monitoring communications between us (calls, letters, emails and texts) to prevent and detect

crime, to protect the security of our communications, systems and procedures, and for quality control and training purposes;

- for management and audit of our business operations including accounting and analysis of applications made to us;
- to verify the accuracy of information that we hold about you and create a better understanding of you as our customer;
- for network and information security purposes i.e. in order for us to take steps to protect your information against loss, damage, theft or unauthorised access;
- to comply with a request from you in connection with the exercise of your rights (for example where you have asked us not to contact you for marketing purposes, we will keep a record of this on our suppression lists in order to be able to comply with your request);and
- for improving our processes, systems, operations and services (including testing) and for business continuity and disaster recovery purposes.

We only collect information which is necessary, adequate and relevant for the purpose you are providing it for.

- It's necessary for **compliance with a legal obligation**, this includes: when you exercise your legal rights under data protection law, to verify your identity, for the establishment and defence of our legal rights, for activities relating to the prevention, detection and investigation of crime, to conduct credit, fraud prevention and anti-money laundering checks and for compliance with our legal and regulatory responsibilities. We may process your personal information to comply with our other legal requirements.
- You have given us your **consent** to use it for direct marketing communications (by us, the RCI Group and the other third parties listed at the end of this Privacy Policy). Please see 'Marketing' below for more information on marketing, including details on how to stop receiving marketing communications. **You can change your marketing preference at any time; for email and SMS, please follow the unsubscribe instructions in those communications.**

4. Use by credit reference and fraud prevention agencies

In order to process your application and confirm your identity, we will perform a credit reference agency and identity check with one or more credit reference agencies. To do this, we'll supply your personal information to credit reference agencies and they will give us information about you. They will supply to us both public (including the electoral register) and shared information including fraud prevention information. When credit reference agencies receive a search from us they will place a search footprint on your credit file that may be seen by other organisations.

We'll use this information to:

- validate the data you have provided to us;
- prevent criminal activity, fraud and money laundering;
- manage your account(s); and
- ensure any offers provided to you are appropriate.

We will continue to exchange information about you with credit reference agencies while you have a relationship with us. This information may be supplied to other organisations by the credit reference agencies, who can retain the information that we give to them for 6 years after your relationship with us has ended.

If you're making a joint application, or you tell us that you have a spouse or financial associate, we will link your records together. You should make sure you discuss and share this information with them, before making an application to us. Credit reference agencies will also link your records together and these links will remain on both of your files until such time as you file for a disassociation with the credit reference agencies in order to break that link.

The identities of the CRAs, their role also as fraud prevention agencies, the data they hold, the ways in which they use and share personal information, data retention periods and your data protection rights with the CRAs are explained in more detail at www.experian.co.uk/crain.

Before we provide any services 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 your information. If we, or a fraud prevention agency, determine that you pose a fraud or money laundering risk, we may refuse to enter into a relationship with 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 other organisations refusing to provide services, financing or employment to you. If you have any questions about this, please contact us.

Further details explaining which fraud prevention agencies we use and how the information held by fraud prevention agencies may be used can be obtained by contacting us using the contact details set out below.

5. Automated decisions and profiling

RCI Bank UK may use a credit reference agency scoring system and fraud detection and prevention system, i.e. an automated system to assess your application and decide whether to enter into an agreement with you and an automated fraud detection and prevention system. You may ask us to ensure that, when we are evaluating your application for an account, we don't base any decisions solely on an automated process. You must notify us of this request in writing using the contact details below.

If you make such a request, you will then have the right to be notified where such a decision is or will be based on an automated process. If we notify you that we have taken such a decision, you may request us to review that decision other than by automatic means by writing to us within 21 days of receiving the notification.

We will create a profile of you based on the information that we hold about you and the services that you are interested in in order to send you tailored offers (if you have agreed to receive marketing communications from us) from time to time.

6. Data anonymisation and use of aggregated information

Your information may be converted into statistical or aggregated data in such a way as to ensure that you are not identified or identifiable from it. Aggregated data cannot be linked back to you as a natural person. We might pass on this information to companies in our Group for analytical and statistical purposes or to other companies, such as advertisers, to use for our business and research purposes.

7. Who do we share your information with?

We may share your information with:

- Companies and consultants providing services to us (for example, marketing agencies, mail outsourcing service providers, information technology service providers who provide and maintain our systems and our website host). Those companies and consultants providing services to us will only use your information to provide those services to us.
- Third party suppliers who fulfil business activities for us (like marketing, events and market research etc.)
- Selected partners who help us to provide you with the information, products and services that you request.
- Other members of the RCI Group for purposes set out in this Privacy Policy and for product development, statistical analysis and audit purposes.
- A purchaser or potential purchaser of our business or otherwise in the event of a merger, acquisition, re-organisation or similar event.

- A third party company that may take over your contract so that you can continue with your contract.
- A third party involved in the funding, liquidity, capital or treasury and/or related services in relation to your contract with us;
- Third party insurance and services providers.
- Credit reference, identity authentication and fraud prevention agencies to help us make credit decisions and fraud prevention checks (they may also share information about you with us).
- The police, fraud prevention and identity authentication entities, other law enforcement agencies, government and tax authorities in the United Kingdom or abroad in order to detect, investigate and prevent crime (please note that fraud prevention agencies may also enable law enforcement agencies to access and use your information to detect, investigate and prevent crime).
- The courts in the United Kingdom or abroad as necessary to comply with a legal requirement, for the administration of justice, to protect vital interests and to protect the security or integrity of our business operations.
- Our legal and other professional advisors.
- Anyone else where you have given consent or as required by law.

Please be aware that we engage third party agencies, who on occasion, may contact customers by post, email, telephone or SMS message on our behalf (for example, to discuss customised offers based on information we hold about you). Any information that you provide to the agency or any requests that you make for further information will be passed onto RCI Bank UK and we will deal with your query. Please be assured that any information you provide to the agency will be kept secure and confidential.

8. Marketing communications

We would like to contact you with exciting and relevant information about RCI Bank UK's promotions, events, information, products and services which may be of interest to you. We may do this by post, email, SMS and/or telephone, unless you have told us not to contact you specifically for this purpose.

We may also share your personal information with our recommended third party partners, so that they can contact you with marketing information about their products and services.

You can change your marketing preference at any time by getting in touch with us. For email and SMS, please follow the unsubscribe instructions in those communications.

9. Where we store your information/ Transfers to third countries

Sometimes our service providers or other group companies may be located in other countries and in which case we may send your personal information to countries which have different standards of data protection than the UK. We have put in place protections to ensure that your information is always safeguarded.

We store your information on servers located within the European Economic Area (EEA). We may change the location of servers in the future to improve services to you but we shall always ensure that we put in place protections to ensure that your information is safeguarded. Due to the international nature of our business, there may be some instances where your information is processed or stored outside of the EU. In those instances, we will ensure that appropriate safeguards are in place for that transfer and storage as required by applicable law.

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

10. How long we keep your information

If your application for an account is not automatically approved or if your application is accepted but you do not proceed, we keep your information for as long as necessary to deal with any ongoing queries you may have and/or compliance with laws and regulations. If your application is accepted and you proceed, we hold your information for a maximum of 7 years from the date on which your relationship with us ends.

Credit reference agencies will retain the information that we give to them for 6 years after your account is closed.

Fraud prevention agencies can hold your information for different periods of time, and if you are considered to pose a fraud or money laundering risk, your information can be held for up to 7 years.

We will not hold your personal information in an identifiable format for any longer than is necessary. We hold your personal information for the periods mentioned to establish, bring or defend legal claims.

The only exceptions to the periods mentioned above are where:

- the law requires us to hold your personal information for a longer period, or delete it sooner;
- where you have raised a complaint or concern regarding a product or service offered by us, in which case we will retain your information for a period of 7 years following the date of that complaint or query; or
- you exercise your right to have the information erased (where it applies) and we do not need to hold it in connection with any of the reasons permitted or required under the law.

At the end of the retention period, your data will either be deleted completely or anonymised, for example by aggregation with other data so that it can be used in a non-identifiable way for statistical analysis and business planning.

11. Your rights

Under data protection laws, you have the following rights in respect of your information:

- to be **informed** about the processing of your personal information (this is what this Privacy Policy sets out to do);
- to have your information **corrected if it's inaccurate** and to have **incomplete information completed**. If you enter into an agreement with us, you can change your information via online banking – it's important that you keep your information up to date;
- to **object to processing** of your information provided we do not have any continuing lawful reason to continue to use and process the information. When we do rely on our legitimate interests to use your personal information for direct marketing, we will always comply with your right to object;
- to **withdraw your consent** at any time where we rely on it to process your information;
- to **restrict processing** of your information provided we do not have any continuing lawful reason to continue to use and process that information;
- to have your information **erased** provided we do not have any continuing lawful reason to continue to use and process that information;
- to **request access** to your information and information about how we process it;
- from May 2018 only, to **move, copy or transfer** your information; and
- rights relating to **automated decision making**, including profiling.

You have a number of rights in relation to your personal information as mentioned above under data protection law. In relation to most rights, we will ask you for information to confirm your identity to protect the confidentiality of your personal information and, where applicable, to help us search for your personal information. Except in rare cases, we will respond to you within 30 days after we have

received any request (including any identification documents requested).

The way we process your information and the legal basis on which we rely to process it may affect the extent to which these rights apply. If you would like to discuss or exercise any of these rights, please contact us using the details provided below.

You have the right to lodge a complaint with the Information Commissioner's Office where your information has or is being used in a way that you believe does not comply with data protection laws. We encourage you to contact us before making any complaint and we will seek to resolve any issues or concerns you may have. You can also contact our Data Protection Officer with any data protection concerns. We've included how to contact them below.

12. Security

We are committed to ensuring that your information is secure. To prevent unauthorised access or disclosure of information we have physical, electronic and managerial procedures in place to keep your information safe.

13. Contact details

If you have any specific data protection questions, concerns or a complaint, you can address it to our Data Protection Team:

Data Controller: RCI Bank UK ("RCI Bank UK"), Rivers Office Park, Denham Way, Maple Cross, Rickmansworth, WD3 9YS.

Data Protection Officer: Data Protection Officer, RCI Bank UK ("RCI Bank UK"), Rivers Office Park, Denham Way, Maple Cross, Rickmansworth, WD3 9YS or Email: dataprotectionofficer-uk@rcibanque.com

Freepost RCI BANK (that's all - no address or stamp needed)

Contacting us by phone

You can call our team on **0330 2000 300**. To help us improve our service we may record and monitor calls. Calls are charged at local rate.

Contacting us by email

When you email us, we collect some personal details like your name, address and phone numbers. Email isn't 100% secure – so we advise that you keep personal information to a minimum. With this in mind, please don't transmit account information using email.

Contacting us by secure message

When you are logged in to online banking you can send a secure message to contact us.

Emails are stored on our standard internal contact systems which are secure and can't be accessed by external parties. We store this information for an indefinite period of time in order to identify trends.

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

You can contact them by calling 0303 123 1113.

Or go online to www.ico.org.uk/concerns

This Privacy Policy was last updated on 14th March 2019.

14. Third parties

We may share your information with the following third parties in accordance with this Privacy Policy if you have consented to receive information from third parties:

AGA Performance

APH Airport Parking

Bluestone

Call IT Automotive

Car Care Plan

Contact Advantage

DFDS

GID

JJ Marketing

JR Research

Kernel 42

Lansons

Maiden

Manning Gotlieb

Merkle

OMD

RAC

Typeform Surveys

Verex Group

When you then apply for a product or service from one of our third parties, your data will be collected and used by them under the terms of their own separate privacy policies. Please request those privacy policies directly. We may also, from time to time, share your information with carefully selected third parties which may replace those mentioned above as a result of service changes and improvement, supplier selection and renewal to provide you with the highest levels of service. We shall inform you of such changes. The third parties named may also change from time to time due to corporate rebranding, reorganisations, mergers and acquisitions.

We're here to help, 7 days - if you have any questions, please e-mail hello@rcibank.co.uk or call us on **0330 2000 300**

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Braille, large print and audio versions available on request.