

# Privacy Policy: Hoist Finance UK Limited

This privacy notice is a guide to your relationship with us surrounding our use of the personal information we have about you and is designed to provide you with an understanding of our legal right to process your data, along with your rights as a data subject.

## Who are we and what do we do?

Hoist Finance UK Ltd (HFUK) is part of the Hoist Finance AB (publ) group of companies and is the controller of the data we hold about you. We have been assigned by HPH Ltd or HPH II Ltd (referred to jointly as HPH) as the master servicer in all matters related to debt collection, debt administration, exercising the rights of the lender and processes associated with servicing credit in the UK. Being a master servicer means that we manage your account on HPH’s behalf. Our contact details and information on how you can get in touch with us are set out at the end of this privacy notice.

## What information do we hold, why do we process it & how long for?

In our role as master servicer, we use your information only for the purposes of debt collection, debt administration, exercising the rights of the lender and processes associated with servicing credit. This could be to enter into a dialogue to agree on an appropriate payment plan or for us to better understand your individual circumstances.

In order to pursue the above purposes and to service your account appropriately and fairly, we process the following categories of information, always subject to strict technical and organisational measures, such as access rights and encryption, to keep your information safe;

Type of information	Reason for processing	Legal bases for our processing of your information.	How long do we hold your information for.
<b>Contact and account information</b> including your name, address, and details of previous communication with us, for example records and recordings of telephone calls, emails, and mailings.	To be able to contact you, keep records of any previous conversations or correspondence and in general keep a full and up to date understanding of your circumstances with regards to your dealings with us.	The legal basis for processing this information is based on the legitimate interests we pursue being the servicing of credit arising under the original credit agreement, to which HPH has acquired the claim and appointed us as the master servicer.	7 years from when account is closed with a zero balance, at which point it will be deleted. (excluding call recordings which are deleted after 12 months from when the call took place).
<b>Payment information</b> including your bank account & sort code.	So to be able to process payments in accordance with when you have asked these to be taken and provide refunds if required.	Once your credit agreement has been satisfied we will hold your data to comply with legal obligations to which we are subject, such as such as, Anti Money laundering legislation and DISP (Dispute Resolution Rules).	7 years from when the account is closed with a zero balance, at which point it will be deleted..
<b>Litigation information</b> including court information and the specific legal outcomes and costs.	As part of our collection strategies we may take litigation action against you. You will be notified prior to any action being taken, but in the event it is, we will hold up to date and relevant information on all actions and outcomes so to be able to provide you with the best level of service possible.		7 years from when the account is closed with a zero balance, at which point it will be deleted.

<p><b>Credit reference information</b> including historical addresses, credit application data, and CAIS information.</p>	<p>We require this information to help form a better understanding of your circumstances as well as to improve the accuracy of the information we may already hold about you.</p>		<p>7 years from when we acquired the information from the CRA, at which point it will be deleted or anonymised</p>
<p><b>Sensitive Information</b> including that regarding your health or any other factor that may have an impact on your ability to deal with us.</p>	<p>We are required by the UK's Financial Conduct Authority, the FCA, to take steps to understand the personal and financial circumstances of our customers so we can provide the most appropriate and fair outcomes. This includes information of circumstances which may make our customers more susceptible to detriment. Therefore, the processing of sensitive information can be crucial to protecting the interests of our customers.</p>	<p>This sensitive information will only be processed with your consent. You have the right to withdraw this consent at any time.</p>	<p>7 years from when account is closed with a zero balance or when consent is removed, whichever comes first, at which point it will be deleted.</p>

## Where do we get the information from?

We initially receive the information from the previous owner as part of HPH acquiring the account who then hand it on to us to facilitate our role as master servicer.

However, we also get information directly from you, such as when you talk to one of our agents or send us a letter, email or text providing us with your new address, payments details or circumstances.

Finally, we may also obtain information from authorised third parties in order to increase the accuracy of the information we hold and/or to gain a better understanding of your circumstances. These third parties can be credit reference agencies, the Land Registry, and other organisations which provide services to improve the quality of the data we hold about you.

We may also retain records of your access to, and use of our website to enhance your experience. Please see the cookies page for further information.

More information about Credit Reference Agencies and how they use personal information is available at <https://www.equifax.co.uk/crain.html>.

## Disclosure of your information

We do not disclose your information except in the following limited circumstances, which we believe you will understand:

We may share your personal information within the Hoist Finance AB (publ) group of companies, to which we belong. For example, our IT infrastructure is managed at a Group level. They help to keep our systems operational and secure allowing us to provide the best services to you that we can.

We may share your personal data with carefully vetted organisations, which must comply with our strict security and privacy requirements and follow our guidelines, for the following purposes:

- To assist us in managing your account and/or maintaining accuracy of the information we hold about you. An example of this would be credit reference agency reporting, data aggregators to gain more up to date and accurate information, businesses that carry out satisfaction surveys to better our service.
- To provide us with specialised services to run our business. An example would be the printing company that sends out our physical letters to you, or where we use a third party to collect or manage your account on our behalf and third parties that help us run an efficient and secure IT infrastructure.

Finally, we may also disclose your personal information to third parties:

- In the event we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation or in order to enforce or apply our terms of use or to protect our rights, property or safety. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction, or with authorities for the purposes of tax reporting or anti-money laundering.

In the vast majority cases, your information will be kept within the EU/EEA. Only for limited purposes may data temporarily be processed from outside the EU/EEA. This is where the support teams of our service providers are located outside the EU/EEA to provide 24/7 technical support. In all cases, however, we have technical, organisational, and contractual protections in place to keep the information safe and to ensure an adequate level of protection. Such transfers will be subject to standard data protection clauses adopted by the European Commission, a copy of which may be obtained by contacting us.

## Your statutory data protection rights

As a data subject you have the following rights regarding your information that we hold;

**Right to access:** You have the right to request a copy of the information that we hold about you. If you would like a copy of some or all of your personal information please request this from us directly.. We will respond within one month of your request. All requests for information will be free of charge unless deemed by us to be unfounded, excessive or for further copies of the same information. Any fee will be based on the administrative costs of providing the information.

**Right to rectification:** We want to make sure that your personal information is accurate and up to date. You may ask us to correct or remove information you think is inaccurate. We may ask that you provide reasonable proof to verify your request.

**Right to restrict processing:** If you believe the personal information we hold is inaccurate, unlawful, or that we do not have legitimate interest to process it, you can request that we restrict any processing until this is rectified.

**Right to object to processing:** Where your particular situation merits that we do not process your information for the performance of a task carried out in the public interest or based on our legitimate interest, you have the right to object to the processing.

**Right to data portability:** This right allows you to obtain in a structured, commonly used format, and reuse the information you have provided to us for your own purpose and have it transmitted directly

to different services. This applies only to information we use based on your consent or on basis of a contract.

**Rights related to automated decision making & profiling:** You have the right to safeguards against the risk of potentially damaging decisions being taken without human intervention. This right applies where a decision is based solely on automated processing and produces a legal effect or similar significant effect. If this is the case we must ensure you are able to obtain human intervention, express your point of view, and have the opportunity to challenge it. We will also explain the logic behind the decision.

Profiling is defined as any form of automated processing intended to evaluate certain personal aspects of an individual to analyse or predict aspects of their personal circumstances behaviours or abilities. Processing must be fair and transparent, use appropriate mathematical or statistical procedures, use appropriate controls to minimise inaccuracies and secure personal data.

As part of our collections strategies we may profile you and take automated decisions when looking to litigate. Any litigation action, if successful, will show on your credit rating and could impact your ability to obtain new credit in the future. You will always be notified by letter to the current address we hold before any litigation action is taken. If you disagree with this actions or wish to know more you will have the ability to contact us using details on the associated letter provided to you or use the details provided at the end of this policy.

**Right to erasure (“right to be forgotten”):** You may ask us to delete the information we hold on you where it is no longer necessary for the purpose for which it was collected, where you withdraw any consent you provided for its processing, where you object to our processing of it (see above), or where our processing is unlawful. Please note, however, that we are also subject to certain legal obligations that prevent us from immediately deleting all of your information. For example, we are legally obliged to keep certain data for anti-money laundering purposes for at least five years. However, any data we are prohibited from deleting will be blocked and erased after we are no longer obliged to keep it.

**Right to lodge a complaint:** You have the right to lodge a complaint with the UK supervisory authority, the Information Commissioner’s Office: <https://ico.org.uk/>, where you have a concern about our data protection practices.

## Changes to these terms and our privacy notice

We keep these terms and our privacy policy under regular review and we may change or update this privacy policy at any time. Where we make any changes to our approach to data protection or the way in which we use your data, we will place any updates on our webpage. Please visit this webpage on a regular basis to see if there are any updates to this policy.

This privacy policy was last updated on 19 March 2019.

## How to contact us

Please contact us if you have any questions about our privacy policy or information we hold about you or the basis upon which we process such information: Hoist Finance UK Limited, Quays Reach, Carolina Way, Salford, Manchester, M50 2ZY, 0800 121 6902.



You may also directly contact our Data Protection Officer, our Head of Risk & Compliance, using the contact details above or by the following email: [hfuk\\_compliance@hoistfinance.com](mailto:hfuk_compliance@hoistfinance.com)