

This privacy policy sets out how Marshall Management Services Ltd (trading as Gateway2Lease and Vans2Lease) uses and protects any information that is provided to us whilst using our services. We are registered with the Information Commissioner's Office (ICO) in the UK and we are basing our policies on the General Data Protection Regulation (GDPR).

This notice covers both the use of our branded websites and also information shared within the buying process and through the lifecycle of the contract.

Important Information

- **UK Data Protection License** - our license can be found online via the ICO register using reference - **Z1141896**
- **Regulation** - Data protection laws across the EU change with the introduction of the General Data Protection Regulation (GDPR) on 25 May 2018.
- **Data Processing Officer (DPO)** - our DPO can be contacted via email here datarequest@gateway2lease.com or in writing to [our main trading address found here](#)
- **Data Protection Status** - our business acts as **data controller**. As we are an intermediary / credit broker we pass personal information to partners such as the finance company and supplying dealership

Who are we & why do we collect personal data?

We operate as a credit brokerage in the vehicle finance sector. We collect personal data from our customers who could be either a private individual or a business to arrange the finance and the supply aspects of a new vehicle.

Why should you trust us with your personal data?

- We are licensed by the Information Commissioners Office in the UK and we are bound by the data protection laws and regulations
- We are authorised and regulated by the Financial Conduct Authority, this means we have to abide by strict regulations with regards to selling financial products
- We are members of the BVRLA trade body (British Vehicle Rental & Leasing Association) and we are audited against their code of conduct in the UK
- We are a professional business who have highly trained staff and we invest in the latest secure systems and technology

What personal data do we collect?

The data that we collect includes enquiry information such as contact details and your requirements. We also collect data that is used by the finance company for credit assessment and information that is required for the supply / delivery of the vehicle. This information includes data such as names, email addresses, telephone numbers, correspondence addresses, employment history, income & expenditure data and bank details. We also maintained a marketing register that allows us to monitor who has subscribed to our updates and offers.

What is the legal basis for processing?

On the basis that the processing is necessary due to the arrangement of the finance agreement and also the regulatory requirements to 'know our customer' and to access important aspects such as affordability and financial vulnerability. As the credit broker we are required to apply to the lender on your behalf using the data provided in your application. Also on the basis that we arrange the supply of the vehicle itself including delivery to a home or work address.

Is the data shared with third parties?

Yes, we are a credit broker and we introduce the finance and supply to our select partners. The data will only be shared with third parties for the purposes of applying for finance or processing supply orders. We will only share the data required to fulfill that part of the order e.g. financial data will only be shared with those parties involved in the credit assessment process. Those partners involved in the supply of the vehicle only will only receive information about the order itself such as your contact details and address for delivery. Where customers subscribe to our updates

and offers we will store contact details such as name and email address within our marketing systems. Finally Basic contact details will be shared with our review partner in order to monitor our customer service standards.

How is the data processed?

The data will be used for the purposes of confirming identity, validating affordability and assessing credit. We will also use some of this information to secure the vehicle with the supplying dealer and also to book delivery. Our marketing data will be used to provide updates, offers and important information based on the preferences provided.

How long will the data be held for?

As the data we collect is linked to financial services we must ensure we keep the data relating to the agreement for a certain amount of time to allow us to accurately respond to any service related matters during the contract and then for a number of years after the contract has ended. Our company data retention policy is to retain agreement documentation and related information for a period of six years after the contract has ended. After this point in time we will securely discard of the information.

For those customers who have not entered into a full finance agreement via our company but have either made an enquiry or have subscribed to our mailing list, these customers have the 'right to be forgotten' or to unsubscribe from our marketing at any time. All of our email marketing will have the option to permanently unsubscribe and you can contact us about the 'right to be forgotten' via the contact details at the top of this policy.

How is the data stored?

All of our agreement and customer data is stored on encrypted services based in the UK. Our marketing list data is stored with a reputable worldwide marketing provider on an encrypted database. Note that you will only be on our marketing list if you have specifically subscribed to our updates.

How to complain?

If you are unhappy with how we have processed your data, a complaint can be made by following our complaint process here or by contacting our data protection officer directly via the email address provided at the top of this policy.

By using our services and accepting our terms you are consenting to us using and storing your data

By accepting our terms & conditions you will be agreeing that :-

1. We will hold your relevant personal and company data on our internal systems.
2. If it has changed, we will update your personal data each time you transact with us.
3. As we are a credit broker we will share your personal data with relevant partners such as the finance company or the supplying dealership. We will explicitly write to you confirming where your data has been sent after the vehicle has been secured.
4. We may use your personal data to contact you with regards to service related matters, however we will not share your data with any third party for marketing purposes.
5. If you specifically choose to opt-into our regular email marketing then your contact information will be held with our email marketing partner. You will have the opportunity to unsubscribe at any time.
6. We may also use your personal data in an analytical way to improve our customer experience, website journey and/or the services that we offer.
7. We will use web browser cookies when you visit our website (see more detail below).
8. We will use a customer review partner who will contact you on our behalf to seek feedback on our services.
9. When speaking with us on the telephone our lines will record calls for training and monitoring purposes. We will not retain this information for longer than necessary.

We will treat your personal information as confidential and have a number of internal policies to make this central to our company culture. We should also make you aware of the circumstances where we would be obliged to disclose your information. These circumstances include requests from fraud prevention agencies, law agencies, regulatory bodies or government bodies.

How can you get a copy of some or all of the information that we hold about you?

Under the data protection act law you have the right to get a copy of the personal information that is held by a company about you. This is known as a 'subject access request'. You can request a subject access request from us at any time by sending an email to datarequest@gateway2lease.com. Under the current regulation this request is free of charge however there may be administrative charges for subsequent requests. We will aim to provide this information within one month of the date of receipt. If the request is complex we may need to extend that time frame by up to two months in order to pull all the information together.

Information Security

As a business we are committed to keeping our systems, policies and procedures up-to-date in order to protect your information. All information that you enter into our website via the internet is transferred with encryption via a secure certificate or https connection (see the green padlock in your web browser). We have also undertaken cyber security testing to help keep our website up to the very latest standards. Our internal office IT systems are monitored by our technology partner and all hardware / software is kept up to date in order to meet the latest standards. Further to this all of our staff go through induction and annual training to make them aware of their obligations with regards to customer data.

Website Cookies

Our website uses cookies. The information commission's office describe a cookie as a small text file that can be downloaded onto your computer, tablet or smartphone when you access a website. Cookies are widely used and essentially allow the website to recognise your device and store some information about your preferences or past actions.

On this site we will make all new users aware that cookies are used via a message at the bottom of the page as well as within this privacy policy. The cookies that this site uses are in place to help us track website analytics. We aim to understand the usage of our website, the volume of users, the length of time users spend on the site and also individual page performance etc. All of these analytics are collected so that we can improve the users experience.

Users have a selection of web browsers to choose from, most of these have auto settings that accept cookies. Whilst you can tailor your browser settings so that it will not allow cookies you may find that it impacts the functionality of this website and other websites that you might use.

What information do we monitor & store?

The main types of personal data that we record and store include the following :-

1. Phone calls - incoming & outbound
2. Email communications
3. Important electronic documentation such as contracts and agreements
4. General customer information held within our CRM database
5. History of each order

Your personal data will be held in according with our records retention policy. We will need to hold some of your data whilst you are in a contract arranged by ourselves and then for a reasonable period after the contact has ended. Some of your data may be held in the form of a phone conversation and we will use these recordings for training and monitoring purposes. When we have finished using this data we will delete it from our storage.