

Privacy Policy

Version Control

Privacy Policy	V1.2	05/02/2021
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We may update our privacy policy at any time

Overview

Our Privacy Policy describes how and why we collect personal data and use the information of our customers. This document includes details about who your data will be shared with, the circumstances where your data will be shared and how we will protect your data.

In the UK, the main data protection legislation is the General Data Protection Regulation (known as GDPR) and the Data Protection Act 2018. This policy is written in accordance with these two pieces of legislation and also any other applicable laws. These laws can be updated at any time and we will aim to reflect any changes in our policy. As a company we are committed to protecting the privacy and security of your personal information.

Whenever we've said "you" or "your", this means you, our customer, or any authorised person/s acting on your behalf.

About Us

Gateway2Lease are a trading style of Marshall Management Services Ltd (referred to using "We", "Us", "Our" or the "Company"), is a company registered in England and Wales under company registration number (6327944) whose registered office address is Carleton House, 266-268 Stratford Road, Solihull, West Midlands, B90 3AD, United Kingdom.

Data Controller

With respect to GDPR and the Data Protection legislation, we are defined as the "data controller" of any personal information that we collect. Therefore, we are responsible for making decisions on how we hold and use your personal information.

Regulation

We are regulated by the Information Commissioner's Office (ICO) with regards to data protection, our registration details are below.

Our ICO reference:	Z1141896
ICO Register Entry:	https://ico.org.uk/ESDWebPages/Entry/Z1141896

We are also regulated by the Financial Conduct Authority (FCA) with respect to consumer credit, for more information see our website footer and see our Initial Disclosure (pre contract information).

If our website links to any external or third-party websites, then we should point out that these websites and the associated company will have their own privacy policies. It is your responsibility to make sure you're happy with their privacy policies when using those other sites.

Collecting Information

We collect personal information in line with the UK Data Protection legislation noted above. Collection of information take place from a number of different sources including encrypted online systems. Some of the information will come directly from you, but we may also get some of this information from publicly available sources such as companies house.

Categories of Personal Data

We may collect personal data from the following categories.

- Enquiry Preferences / Qualification
- Personal details / Identity
- Address History
- Employment History
- Income & Expenditure
- Bank Account Detail (We do not collect or store card details)
- Market Research (Where you have participated)
- User Account Information
- Product History
- Website Visit History
- IP Address Data
- Website Cookie Data
- Due Diligence Checks
- Recorded Phone Calls
- Credit / Underwriting Information
- Information required to support our regulatory obligations
- Correspondence Records (e.g. emails)

Information Usage

There are a number of different reasons why we collect your information. The usage of the data includes those instances where we specifically have your consent or where we are required to by law or regulation.

It is important to note that we may process your personal information without your knowledge or consent, where this is required or permitted by law. Examples include where we need to carry out an agreement, where there is a legal obligation, in order to pursue our legitimate interests or for a critical reason that could impact someone's life.

We will only use your personal information for the purposes that we have collected it for. If we need to use it for any other purpose, we will ensure the use is reasonable and that it is in keeping

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

The main uses of your information are to:

- Offer and administer our products and services
- Enable credit checks via the lender
- Carry out know your customer (ID and address) checks
- Support our administration and operations
- Analyse and understand the usage of our products and services
- Continuously improve
- Manage our communication and interactions effectively
- Notify and instruct
- Send communications about our products and services
- Send service led communications where explicit consent is not required
- Analyse data to better understand your circumstances and preferences
- Provide digital solutions
- Prevent financial crime
- Comply with a request from you
- Protect legal rights
- Comply with legal obligations
- Correspond with legal professionals such solicitors
- Correspond with lenders and other third-party intermediaries
- Monitor associated risks
- Recover money that you might owe
- Assist tracing, where you fail to repay or return the property of a lender or supplier
- Ensure information security
- Ensure business continuity

Please note, if you are not willing or fail to provide certain information when requested, we may not be able to enter into an agreement with you.

Information Sharing

We act as a credit broker and not a lender so there will be other parties involved that will need to use your information including the finance company (lender), third party providers and supplying dealership.

When required by law we may share your information with other parties to meet legal requirements. We will also share your information where it is necessary to carry out and administer the relationship with you, or where we have another legitimate interest in doing so or it is otherwise lawful to do so including where we, or the parties we share your information with:

- have your consent
- have a public or legal duty to do so
- have a legitimate business reason for doing so

- send marketing where consent has been given
- send service led marketing (within our legitimate interest)

Your personal information may be shared with our partners and suppliers. This information is only shared to help them provide their services to us or to help them provide their services to you.

Other parties include:

- The lender or finance company
- The supplying dealership (the supplier)
- The vehicle manufacturer (where they are also the supplier)
- Trusted third party partners
- Credit reference agencies (via the lender)
- Third party vendors such as our IT provider & web hosting company
- Advertising and social media partners
- Fraud prevention agencies (via the lender)
- Third party providers that collect your reviews
- Where required by law or to exercise or protect our legal rights

Credit Reference Checks

When you apply with us, we'll obtain your consent to supply your personal information to the lender who will in turn use Credit Reference Agencies (CRA's) to obtain further information about you. When we introduce you to a lender, we will make you aware of who they are at the relevant point within the process.

CRA's will supply the lender with public and shared credit, financial situation, financial history information, and fraud prevention information. This information from the CRA will be used by the lender to assess if you can be offered credit. The lender is also obliged to lend responsibly and will use CRA's to ascertain whether you can afford to purchase the product and/or service. CRA's also assist with verification of the data provided in your application and help with the prevention of financial crime.

When you apply with us and the lender carries out their checks, the CRA's will place a search footprint on your credit file that may be seen by other lenders. If you're making a joint application, CRA's will share your information with other organisations and your data will be linked to the data of your spouse, any joint applicants, or other financial associates. It is important that you discuss this with them and share this information with the joint applicant before submitting the application. These links will remain on your files and their files until you or the joint applicant successfully files for a disassociation with the CRA's to break the link.

Two of the CRA's that our lenders may use are shown below along with their Credit Reference Agency Information Notice (CRAIN) for your reference:

Experian	www.experian.co.uk/crain
Call Credit	www.callcredit.co.uk/crain

Preventing Financial Crime

In addition to credit reference checks our lenders will also carry out anti-fraud and anti-money laundering checks. As a credit broker we are committed to working with our partners to prevent financial crime.

Fraud Prevention Agencies

The lender will carry out checks with fraud prevention agencies for the purposes of preventing fraud and money laundering. Both ourselves and the lender will also carry out checks to verify your identity before we provide any products and services to you.

Recorded Calls / Electronic Tracking

We may record phone calls, emails, electronic documents and any other types of communication. In addition, our digital systems including our websites may track and store records of usage.

Recorded calls are focussed on but not restricted to regulated roles such as sales staff having conversations about financial products. The main purpose of the recorded call is to maintain standards and specifically for training and monitoring reasons. We may also use the recording to establish facts in the event of a dispute. We will not make call recordings available to any third parties, unless legally obliged to do so.

Data Retention

We will not retain your personal information for longer than is necessary and we will only use your information for the purposes collected as stated earlier in this document. As a minimum, your information will be stored by us whilst you are one of our customers. For example, if you enter into a four-year lease contract, we will need to retain your information during this period.

If you stop being a customer of ours, we may retain your data for up to seven years after that point in time. Please refer to the earlier section about how we use your information. If you are no longer a customer of ours, we may need to use your information for record keeping, to respond to a complaint, to show that we correctly followed our process, to show that we met regulatory requirements or for any legal reasons or claims. After the data retention period, we may anonymise your personal information so that it can no longer be linked to you.

Information Security

We treat information security very seriously. As a company we use the latest technology and security in order to protect your information. All staff and any suppliers or contractors that provide services or carry out work on our behalf have to comply with our information security standards. We have processes in place so that we can effectively deal with any suspected data breach and to follow all the relevant regulations.

Your Rights

Under the UK data protection legislation, you have a number of rights in relation to the information that we hold about you. These rights include:

Right of Access	You have the right to access the personal information we hold about you and to obtain information about how we process it. This is referred to formally as a Data Subject Access Request (SAR). See the follow section with regards to SAR requests.
Right to Rectification	You can request the correction of inaccurate or incomplete personal information we hold about you.
Right to Erasure	In some circumstances, the right to request we delete or remove your information where there is no good reason for us continuing to process it, for example where processing is no longer necessary for the purposes for which your information was collected. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below). Please note, we may continue to retain your information if we're entitled to or required to retain it.
Right to Restriction of Processing	You can ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
Right to Object	You can object to us processing your personal information if we're not entitled to use it anymore. Please note, there may be situations where you object to our processing of your information, but we're entitled to continue processing your information and/or refuse that request. You have the right to object where we are processing your personal information for direct marketing purposes. If we agree that your objection is justified in accordance with your rights under Data Protection laws, we will permanently stop using your data for those purposes or provide you with reasonable justification as to why we are required to continue using your information.
Right to Withdraw your Consent	Where we are processing your personal data based on your consent then you have the right to withdraw your consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.
Automated Decision-Making and Profiling	You have the right not to be subject to a decision which is based solely on automated processing (including any profiling), which would have a significant legal effect on you. Note, that as we are the credit broker and not the lender this may apply more to the lender and their privacy policy.
Right to Data Portability	In some circumstances, you have the right to receive certain information you have provided to us in an electronic format and/or request that we transmit it to a third party in a format that can be easily re-used.

If you would like to exercise any of these rights, please contact us using the details provided at the end of this policy document.

These rights are subject to certain exemptions including to safeguard the public interest (e.g. the prevention or detection of crime) and our interests (e.g. the maintenance of legal privilege) where we may be required or permitted by law to retain certain information about you.

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

In order for us to provide you with any information or correct any inaccuracies, we may need to ask you to provide other details to help us respond to your request such as proof of identity checks.

Data Subject Access Request (SAR)

If you want to exercise your 'Right of Access', then you would need to make a formal data subject access request (SAR) by writing to us or emailing us via the details at the end of this policy.

On receipt of the SAR if we agree that we have an obligation to provide the personal information then we will provide it to you free of charge. We will always undertake ID and security checks because providing any personal information.

We will respond to you within one calendar month after we've received the SAR request. If this is not achievable for any reason, we will let you know the reason and how long it is expected to take.

Marketing Consent & Preferences

With your consent, we may use your information to market our products and services, and also products and services from our finance / supply partners and other relevant third parties that have been carefully selected.

With your consent, we will send you marketing via one or more of the follow methods. These include post, email, telephone, text message or social media marketing. We may use your information for market research and to identify trends.

You can change your mind on the marketing methods that we use, and also completely opt out at any time. You can do this by clicking on the 'unsubscribe' link in any marketing email. Alternatively, you can text "stop" to the number provided within a text message communication. We will aim to update our records as quickly as possible if you unsubscribe but please note that this may not be immediate.

Website Cookies

We use cookies when you visit our Website, but you can control these through your browser settings. To understand what cookies are, why you are collecting them, and what information cookies store, please refer to our Cookies Policy.

Legal & Regulatory Obligations

We will use your personal information to meet our legal and compliance obligations, to comply with legislation and regulations and to share with regulators and other authorities that we may be subject to. This may include the prevention of financial crime. We will only do this where we are required to comply with a legal obligation, where it's in our legitimate interests and that of others, or to prevent or detect any unlawful acts.

Social Platforms (Social Plugins)

We use social plugins (buttons) of social networks such as Facebook, Instagram, Pinterest and Twitter. When a button is activated, the social network can retrieve data independently, whether you interact with the button or not. Where you have logged in to a social network, the network can assign any of your visits to the website to your user account.

If you're a member of a social network and do not want that social network to combine data retrieved from your visit to our websites with data, they hold on you, you will need to log out from the social network concerned before activating the buttons.

Contact Us & Our Data Protection Officer

You can contact us or our Data Protection Officer (DPO) to discuss this policy below :

Trading Address	Marshall Management Services Ltd, Abberley View, Saxon Business Park, Hanbury Road, Stoke Prior, Bromsgrove B60 4AD, United Kingdom
Telephone Number	01299 407 360
Email Address	datarequest@gateway2lease.com

Making a Complaint

You can make a complaint to us by visiting our complaints procedure at the bottom of every page on our website.

If you are unhappy with the outcome of any complaint made to us about your personal information, then you are also entitled to complain to the Information Commissioner's Office (ICO). The contact details for ICO are below:

Address	ICO, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
Telephone Number	0303 123 1113
Email Address	casework@ico.org.uk