

# PRIVACY NOTICE

## Who we are

Southern Counties Finance Limited is a privately owned asset finance company, Company Registration Number 3406451. The terms 'we', 'us' 'our', 'Southern Counties Finance' and 'Company' shall be construed as Southern Counties Finance Ltd.

This Privacy Notice applies where we are a data "controller" for the purposes of GDPR (as defined below), i.e. to the extent that we determine the purposes and means of the processing of your personal data.

## Data Protection Officer

Southern Counties Finance Ltd Data Protection Officer can be contacted with any comments, queries or concerns about this Notice or about any information we hold about you:

Telephone: 01992 552881

Address: Southern Counties Finance Ltd, 107 Fore Street, Hertford, SG14 1AS

Email: [info@scfinance.co.uk](mailto:info@scfinance.co.uk)

## About this Notice

This Notice explains how and when we use your personal information and for what reason(s) and related information, for example about your rights.

We refer in this Notice variously to 'personal information', 'data', 'personal data' and 'personal details'. We use these terms interchangeably to mean information capable of identifying you.

Whilst you can visit our website without telling us who you are or providing any information about yourself which might identify you, if you do provide us with personal information about yourself for e.g. through submitting the contact form on our website or through an intermediary, we will only use this information in accordance with data protection law including in particular but not limited to the General Data Protection Regulation (EU) 2016/679 ('GDPR') and any applicable laws made under it.

### **What information do we collect and hold about you?**

We collect personal information about you, either through direct contact or via the website using the online contact form and when you provide it through an intermediary such as a broker. We may also obtain personal information about you from third parties such as credit reference agencies and fraud prevention agencies.

The personal information you may be asked to provide, whether directly or through an intermediary, is likely to consist of (but not limited to) your name, contact details i.e. address, telephone number, email address, date of birth; financial status i.e. income and expenditure and employment. This will also be the case when you apply for finance with Southern Counties Finance.

There are several other types of personal data that may be processed by us which are necessary in order that we may fulfil our contractual and legal obligations, in particular as detailed in the table below.

<b>Type of personal information</b>	<b>Description</b>
Financial	Your financial position, status and history.
Contact	Where you live and how to contact you.
Socio-Demographic	Details about your work or profession and nationality.

Transactional	Details about payments you make to our account and any insurance claims that may be made in relation to assets held under a facility you hold with us.
Contractual	Details about the Facilities entered into and / or any security provided by you or your associates.
Communications	Information contained within letters, emails or texts and discussed during conversations with us.
Social Relationships	Your family, friends and other relationships which have a bearing on your Facility held/ potentially held with us.
Open Data and Public Records	Details about you that are in public records, such as the Electoral Register, and information about you that is openly available on the internet.
Documentary Data	Details about you that are stored in various documents or copies of them for e.g. your passport, driving licence or birth certificate.
Consents	Any permissions, consents or preferences that you give us. For e.g. how you want us to contact you, whether you get paper statements, or prefer large-print formats.
National Identifier	A number or code given to you by a government to identify who you are, such as a National Insurance number (this may be provided in the form of a social security benefit letter or pension letter issued by the government and provided to us for the purposes of anti-money laundering).
Other data	<ul style="list-style-type: none"> <li>• Health data</li> <li>• Criminal convictions and offences</li> </ul> <p>Any other information relevant to our decision to grant a facility to you, including that provided by any credit reference or fraud prevention agency.</p>

## **Purposes and legal basis for processing your personal information**

The protection of your personal information is very important to us and we will only process your personal information for the following purposes:

1. to allow us to deal with your enquiries
2. to provide you with a service
3. to authenticate your identity
4. to manage our relationship with you
5. to inform you about our products and services , including by direct marketing
6. for administrative purposes
7. for debt administration and factoring
8. for purposes related to our proposed corporate activity, such as a sale or merger
9. to maintain our own accounts and records
10. to support and manage our employees
11. where required to do so by law for e.g. sharing for crime prevention.

At Southern Counties Finance we rely on the following legal bases for the processing of your personal information, depending upon the purpose:

Contract: where necessary to perform a contract with you or to take steps at your request before entering into a contract with you.

Consent: in some cases we may request your consent for processing, if so this will be specific to the processing and we will inform you of the purpose and you can provide or refuse such consent at your discretion.

Legitimate Interests: where necessary for our legitimate interests or those of third parties which are not overridden by your interests, rights or freedoms. These comprise providing our services, direct marketing, fraud prevention, ensuring network and information security, indicating possible criminal acts or threats to public security, processing employee or client data and administrative transfers within our group of companies.

Legal Obligation: where Southern Counties Finance is under any legal obligations, e.g. with respect to anti-money laundering or other regulatory matters, which requires us to process or share personal data.

Ordinarily the lawful basis relied on by Southern Counties Finance is that of contract, legitimate interests or legal obligation depending on the purposes of the processing. However, for transparency and good housekeeping, we may also request your specific consent from time to time for e.g. prior to undertaking a credit search or taking and retaining copies of your identification documents, but where one of the other bases above applies, we do not rely on that as the sole legal basis of processing.

If you have provided consent to our processing of your personal data, your consent can be withdrawn at any time by contacting the Data Protection Officer. This will not affect processing before withdrawal or which is based on another lawful basis of processing.

## **Recipients**

We may provide your personal data to the following recipients:

- credit reference agencies – [experian.co.uk/crain](https://experian.co.uk/crain), [www.equifax.co.uk/crain](https://www.equifax.co.uk/crain),
- fraud prevention agencies, law enforcement
- persons who may provide goods and services that we believe would be relevant to you
- our service providers, including anyone we appoint as a data processor
- financiers, including block discounters, banks and other financial institutions
- professional advisers for e.g. solicitors, accountants, auditors, enforcement / tracing agents and valuers
- consultants / contractors
- insurance providers
- prospective purchasers of our business or company and their advisers
- other members of our group of companies

Please note that some recipients may be located outside of the European Union ("EU") in countries which have not been designated as ensuring an adequate level of protection for personal data. Where that is the case, see below.

## **Transfer of your personal data outside of the EU**

Your personal information may be transferred outside of the EU for further processing in the context of any operation we may have outside the EU or by the recipients described above.

Except where the transfer is necessary to perform a contract with you or to implement pre-contract measures at your request or to perform or conclude a contract with a third party (including your associated business) in your interest, we will ensure at least one of the following safeguards is implemented:

- we will only transfer the data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission; or
- where we transfer the data to third parties, we will use specific contracts between us and the recipient in a form approved by the European Commission to protect it; or
- where the transfer is to the USA, the recipient is within the EU-US Privacy Shield.

If you would like a copy of the relevant safeguard(s) please email us at [info@scfinance.co.uk](mailto:info@scfinance.co.uk)

## **Retention of personal information**

We keep your personal information for the following periods:

- where you have proceeded in doing business with us for six years after termination of the business relationship, except where the law requires us to keep it for longer;
- in other cases we retain data for as long as the law requires us to do so.

Personal information will not be held for longer than is necessary for the purposes for which it was processed and will be periodically reviewed to determine whether retention is still required.

## **Your rights as a data subject**

You may have a right to the following:

- Right to be informed
- Right of access
- Right to rectification
- Right to erasure
- Right to restrict processing
- Right to data portability – for e.g. you may be able to request for your personal data to be transferred from one data controller to another in certain circumstances
- Right to object
- Rights related to automated decision making including profiling
- Right to lodge a complaint with our supervisory authority, namely the Information Commissioner Office (“ICO”):

Information Commissioner  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Telephone: **0303 123 1113**

**[www.ico.org.uk](http://www.ico.org.uk)**

To exercise any of these rights, please contact Southern Counties Finance Data Protection Officer.

### **Withdrawing consent**

As mentioned above, where processing of your personal data is based only on your consent, you have the right to withdraw that consent at any time. Your withdrawal of consent will not affect the lawfulness of processing based on consent before its withdrawal.

### **How to complain**

Complaints can be made to us at any time, free of charge in person, by telephone, email, letter, or via the website to any member of staff at Southern Counties Finance. This is without prejudice to your right to complain to our supervisory authority, the ICO.

### **Our use of Cookies**

Our website makes use of the DYNSTRV cookie for server load balancing.

### **Links to other websites**

Our website may contain links to other sites and personal information may be collected through those other websites, however, this Privacy Notice does not apply to those websites.

## **Changes to our Privacy Notice**

We keep this Notice under regular review and, as such, the Notice may change from time to time. We recommend that you read this Notice before submitting any personal information to us through our website and regularly thereafter for any changes.

This Notice was last updated in May 2018.