



# Customer Privacy Notice

# Privacy Notice

We're committed to providing you with the highest possible levels of service, security, and protection when we process your personal data.

Personal data is any information that can be used to identify you as a unique individual.

We must process your personal data fairly and lawfully. This also means you're entitled to know how we intend to use your data. You can then decide if you want to give it to us so we can provide the product you need.

All our employees are responsible for maintaining customer confidentiality and we provide training to remind them about their obligations. In addition, our policies and procedures are regularly audited and reviewed.

Your personal data is managed by Vanquis Bank Ltd which is part of the Vanquis Banking Group.

Vanquis Banking Group consists of the following companies which may process personal data:

- Vanquis Bank Ltd
- Cheque Exchange Ltd
- Provident Financial Group Corporate Services Ltd
- Moneybarn Ltd
- Moneybarn No.1 Ltd
- USnoop Ltd

For more information on these companies please visit [vanquis.com](https://vanquis.com)

If you have any questions about this notice, see the Contact us section on [vanquis.com](https://vanquis.com) for the ways you can reach us and when we're available.

## Personal data we collect from you

We collect your personal data:

- when you apply for our products or services through channels such as:
  - our website
  - on the phone
  - through our partners, brokers, or affiliates
  - our app or via the customer portal on our website
- when you update your information online, using our app, through email or over the phone, for example when you change your address
- when you speak to us on the phone, for example when you ask us a question about your account or when we receive an update on your personal circumstances
- when you visit our website, use our online web chat services and any digital or mobile app we may offer now or in the future
- by observing how you use our products and services, or those of other members of our Group, for example from the transactions and operation of your accounts and services, or your use of our apps or websites
- from profile data and usage data which relates to the profile you create to identify yourself when you connect to our internet or mobile services and how you use those services
- when you send us letters, emails or other documents
- when we ask you questions about your experience using Vanquis

The types of personal data we may collect from you, depending on the product you have with us (savings account, credit card or loan), can include:

### Identity:

Full name, title, date of birth and agreement number

### Contact:

Full address, email address and phone number

### Financial:

Bank details, credit/debit card details, earnings, income, expenditure, spending habits, transaction history, tax reference number, credit history, source of wealth, source of funds and information about others you are financially linked to, tax status, Tax Identification Number (TIN)

### Profile:

Gender, occupation, marital status, employment status, employer details, citizenship status, residential status, and vehicle insurance information

### Identification:

Driving licence, share code, passport, National Insurance number, vehicle identification number (VIN), and other national identifiers

### Communication:

Call recordings, emails, and any other form of communication

### Technical:

Internet Protocol (IP) address, location data, operating system and browsing or usage behaviour, for example tracking your clicks on a webpage or your activities in our apps

### Special Category Data:

- racial or ethnic origin;
- political opinions;
- religious or philosophical beliefs;
- trade union membership;
- genetic data;

- biometric data (where used for identification purposes);
- data concerning health;
- data concerning a person's sex life; and
- data concerning a person's sexual orientation.

### **Criminal Data:**

Criminal convictions and offences, penalties and restrictions, County Courts Judgements, and insolvency details

### **Behavioural biometrics:**

Information on how you use your device, keystrokes, speed of clicks.

### **Device information:**

Screen resolution, battery status, browser details, memory settings.

## **Personal data we collect from others**

Sometimes we work with selected third parties and we may receive your personal data from them. These include:

- other companies across the Vanquis Banking group
- suppliers
- sub-contractors that help to support management of your account
- referrers, for example affiliates or brokers
- industry fraud databases, for example Cifas and National Hunter
- fraud prevention agencies
- publicly available data, for example the electoral register
- Credit Reference Agencies (CRAs)
- debt charities
- debt management agencies
- insolvency services
- marketing list providers
- social media platforms
- open banking partners

We may obtain personal data relating to you from other individuals. If someone acting on your behalf provides this data, we'll record what's been provided and who gave it to us.

Where a third party makes a payment on your behalf we will record their full name, relationship to you and why they are making the payment on your behalf to comply with regulatory requirements.

## **Personal data you provide about others**

When you provide personal data about another individual, we will assume you have told them you are sharing their details and where they can find more information on how we process their personal data. This can include individuals who are:

- a joint applicant or additional cardholder on an account you hold or are applying for
- an appointed representative acting under a Power of Attorney or similar authority
- an individual you have given permission to communicate with us on your behalf

# How we use your personal data

Data protection law says that we can only use personal data if we have a proper reason to do so. For example, these reasons include fulfilling a contract we have with you, when we have a legal duty, when it is in our legitimate interest or when you consent to its use. When data protection law allows us to process your personal data for our own legitimate interests, it is only allowed provided those interests do not override your own interests and/ or your fundamental rights and freedoms.

An example of where we would process your personal data for our legitimate

interests would be where you believe you are the victim of fraud and in order to investigate your claim. We may have to share your name and account number, payment and other details of the case with any other bank involved. Sharing personal data in these circumstances would not only be in our legitimate interest but also yours. An example of us using your personal data when we have a legal duty, is where we must do so in order to comply with anti-money laundering obligations.

This table gives you information on what activities we use your data for, why we need to use your data and what our reason is for doing so.

Activity	Purpose	Types of Personal Information	Legal Basis for processing your information
Processing your application for a product or service with us.	<div>To consider and process applications made by you for products and services we provide, we may:</div> <ul style="list-style-type: none"><li>• Share information with Credit Reference Agencies (see the section named ‘Credit Reference Agencies’ for more information)</li><li>• Assess information we hold about you, for example where we have an existing relationship with you</li><li>• Assess your application for lending products using an automated credit decisioning process</li><li>• Assess your ability to repay a lending product you hold with us, by reviewing your income and expenditure based on data we hold, capture or you provide us with</li></ul>	<div>Identity data</div> <div>Contact data</div> <div>Financial data</div> <div>Profile data</div> <div>Identification data</div> <div>Communication data</div> <div>Special Category data (if disclosed by you)</div> <div>Criminal data (if disclosed by you)</div>	<div>Necessary for the performance of a contract</div> <div>Consent (when information relating to a vulnerability is provided)</div>

Activity	Purpose	Types of Personal Information	Legal Basis for processing your information
<b>Managing and administering your account with us.</b>	<p>To deliver the products and services we provide, including:</p> <ul style="list-style-type: none"> <li>• Making and accepting payments, and receiving deposits on your behalf</li> <li>• Providing you with information, advice and guidance on the products and services you hold. This includes account statements, formal reminders and notices informing you of changes</li> <li>• Providing updates on your repayment status to credit reference agencies, including if default occurs</li> <li>• Recovering money owed to us</li> <li>• Responding to queries raised by you via email, post or phone</li> <li>• Calculating interest and, where relevant, determining fees and charges which may apply to your account</li> <li>• Searching Credit Reference Agency data to support discussions with you regarding repayments to your product</li> <li>• Complying with laws which require us to provide information, directly or indirectly to any national authority, for the purpose of calculating and collection of tax</li> <li>• Where necessary, and if you agree, sharing your information with not-for-profit debt advisory services such as StepChange</li> </ul>	<p>Identity data Contact data Financial data Profile data Identification data Communication data Special Category data (if disclosed by you) Criminal data (if disclosed by you) Technical data</p>	<p>Necessary for the performance of a contract  Legitimate Interest  Legal obligation  Consent (when information relating to a vulnerability is provided)</p>

Activity	Purpose	Types of Personal Information	Legal Basis for processing your information
<b>Sending you communication to service your account, products or services and to provide you with Vanquis Banking Group updates.</b>	<ul style="list-style-type: none"> <li>• If you are employed by us and you are also a customer, we will use your customer information to help manage your employee relationship with us</li> <li>• Where we have a duty to protect vulnerable customers</li> <li>• Where we need to investigate or support you with a technical or usability issue</li> <li>• Where necessary, we will use your data in line with our terms and conditions</li> </ul>		
	<p>To make sure we're giving you the important information you need, we will use various methods of communication to send you information about your account or general updates in relation to Vanquis Banking Group (VBG). This may be by email, push notification, SMS or post. For example, this may include:</p> <ul style="list-style-type: none"> <li>• sending you reminders or receipts for payments or other information in relation to the administration of your product.</li> <li>• sending you messages updating you about company acquisitions and mergers.</li> <li>• sending you information informing you of forthcoming changes such as increasing or decreasing interest rates on any savings or lending products you hold. This can include information about other savings products which may be better value for you.</li> </ul>	<p>Identity data Contact data Communication data</p>	<p>Legitimate Interest</p>

Activity	Purpose	Types of Personal Information	Legal Basis for processing your information
<b>Competitions and prize draws.</b>	We will use your information to help administer competitions and prize draws. We may automatically enter you in a competition or prize draw that we operate, processing your information we already hold to determine if you are a winner. If you do not want us to process your information when we run such a competition you can tell us in the Vanquis app or by emailing datarightsteam@vanquisbank.co.uk	Identity data Contact data Communication data	Legitimate Interest  Consent
<b>Gifts and rewards.</b>	We may use your information to deliver any appropriate gifts or rewards to you, for example to celebrate special occasions.	Identity data Contact data Communication data	Legitimate Interest
<b>To manage complaints raised by you</b>	To address enquiries or complaints we may receive from you, or a representative appointed by you.	Identity data Contact data Communication data Special Category data Financial data Profile data	Legitimate Interest
<b>Testing our systems and processes</b>	Where necessary, we may use your personal data to improve and/or test the accuracy of our systems and processes.	Identity data Contact data Special Category data Financial data Profile data	Legitimate Interest
<b>Profiling activities</b>	To develop and improve new products and services and identifying which may be of interest to you.	Identity data Contact data Financial data Profile data	Legitimate Interest



Activity	Purpose	Types of Personal Information	Legal Basis for processing your information
	<p>To support the creation of marketing campaigns:</p> <p>For more information, see the section ‘Automated decision making and profiling’.</p> <p>To support our decisions:</p> <p>To help ensure our decision controls within the application are fit for purpose.</p>		
<b>Sharing relevant marketing about our products and services</b>	<p>We will contact you by email, SMS, post, telephone, in-app message and push notification about products and services from Vanquis Bank Limited, Vanquis Banking Group companies, and relevant third-party companies (see the section titled ‘relevant third-party companies’ for more info) based upon the specific instructions you have given us.</p> <p>See the section ‘Using your data for direct marketing’ for further information.</p>	<p>Identity data</p> <p>Contact data</p> <p>Profile data</p>	<p>Legitimate Interest</p> <p>Consent</p>
<b>Sharing your data with marketing partners to include you or exclude you from marketing campaigns</b>	<p>To ensure that existing Vanquis customers receive marketing communications that are relevant to them, we may:</p> <ul style="list-style-type: none"> <li>• Share information with our marketing partners to include existing customers or remove existing customers from marketing campaigns</li> <li>• Use data we hold about you to ensure our marketing activity is appropriately targeted</li> </ul> <p>For more information see the section, ‘Using your data for direct marketing’.</p>	<p>Identity data</p> <p>Contact data</p>	<p>Legitimate Interest (to ensure marketing communications are appropriate and relevant)</p>

Activity	Purpose	Types of Personal Information	Legal Basis for processing your information
<b>Assessing your suitability for lending by a third party partner.</b>	With your permission, we will pass your information to a third party that may consider lending to you in the event that Vanquis is not able to.	Identity data Contact data Financial data Profile data Identification data Communication data Special Category data (if disclosed by you) Criminal data (if disclosed by you)	Consent
<b>Sharing your details with brokers</b>	To share your contact details with brokers who introduce you to us to help them with their accounting and administration.	Identity data Contact data Financial data	Legitimate Interest Consent
<b>Meeting our legal and regulatory obligations</b>	<p>We have a legal responsibility to use your data for the following activities:</p> <ul style="list-style-type: none"> <li>• Passing information to HMRC where a court order is in place</li> <li>• Sharing your data if it is requested by the Police and other law enforcement agencies to investigate or prevent crime</li> <li>• Sharing your data if it is requested by the authorities when we report on any suspicious activity that could indicate money laundering</li> <li>• To undertake affordability reviews</li> <li>• Sharing your data to provide information to our industry regulators</li> </ul>	Identity data Contact data Financial data Identification data Communication data Special Category data	Legal obligation Necessary for the performance of a contract

Activity	Purpose	Types of Personal Information	Legal Basis for processing your information
	<ul style="list-style-type: none"> <li>• There may be other occasions where data may need to be shared as a result of a court or production order</li> <li>• Identifying and managing risks to our organisation</li> <li>• Where we have a duty to protect vulnerable customers</li> <li>• Sending regulatory communications to you, such as annual statements, default notices and interest rate change communications</li> </ul>		
<b>Auditing and assuring our processes, products, and services</b>	To carry out internal and external audit activities, to examine and evaluate the effectiveness of our internal systems and controls.	Identity data Contact data Financial data Identification data Communication data Special Category data Criminal data	Legal obligation
<b>Conducting market research and surveys</b>	To understand your experience and interactions with us so we can improve our products and services.	Identity data Contact data Profile data Financial data	Legitimate Interest

Activity	Purpose	Types of Personal Information	Legal Basis for processing your information
<b>Preventing and investigating fraud and financial crime</b>	<p>We may use your data to check your identity, to detect, investigate and <b>report</b> financial crime, and to ensure we are taking measures to prevent fraud and financial crime.</p> <p>We may also use your data to monitor and assess if your account is being used or suspected to be used for fraud. We will look at behavioural trends and device use, which do not match your usual activity.</p> <p>This may also involve sharing your personal data with third parties. For more information, see the sections named 'Credit Reference and Fraud Prevention Agencies' and 'Sharing your personal data'.</p>	<p>Identity data</p> <p>Contact data</p> <p>Profile data</p> <p>Financial data</p> <p>Identification data</p> <p>Criminal data</p> <p>Communication data</p> <p>Special Category data</p> <p>Technical data</p> <p>Behavioural biometrics</p> <p>Device information</p>	<p>Legitimate Interest</p> <p>Legal obligation</p> <p>Substantial public interest (Preventing Fraud)</p>
<b>Collecting IP address when using our web site</b>	<p>We may collect your IP address when you use our websites to help us detect suspicious activities. We may also collect this information to manage your cookie preferences. For more information, see our Cookie Policy on <a href="https://vanquis.com">vanquis.com</a></p>	Technical data	<p>Legitimate Interest</p> <p>Consent (Non-essential cookies)</p>
<b>Collecting device information and your activity when using our mobile apps or website</b>	<p>We may collect your device information and the activities you complete when you use our apps or website to help us improve our products and services.</p>	Technical data	Legitimate Interest
<b>Managing Power of Attorney or Letter of Authority processes</b>	<p>Upon signed instruction, we will discuss matters arising from your account with your appointed representative.</p>	<p>Identity data</p> <p>Contact data</p> <p>Profile data</p> <p>Financial data</p>	Necessary for the performance of a contract

Activity	Purpose	Types of Personal Information	Legal Basis for processing your information
		Identification data Criminal data Communication data Special Category data Technical data	
Supporting you through the arrears and debt collection processes	We may share your personal data with third parties for the following reasons: <ul style="list-style-type: none"> <li>• To recover money owed to us</li> <li>• To trace your whereabouts</li> </ul>	Identity data Contact data Profile data Financial data Identification data	Legitimate Interest
To sell your debt to third parties	We may sell your account to third parties where we can no longer recover the debt.	Identity data Contact data Profile data Financial data Identification data	Legitimate Interest
Mergers, acquisition, and business funding	We may share your data with another company to support our business objectives, which may involve buying, selling, or funding of business assets.	Identity data Contact data Profile data Financial data Identification data Criminal data Communication data Special Category data Technical data	Legitimate Interest

Activity	Purpose	Types of Personal Information	Legal Basis for processing your information
<b>Sharing your data with other companies within our Group</b>	<p>We will share your personal data with our Group companies for the following reasons:</p> <ul style="list-style-type: none"> <li>• to provide the products and services you request</li> <li>• for profiling and market research</li> <li>• to support business analysis, for example assessing and improving the performance of our products and services</li> <li>• to help us to keep your data accurate and up-to-date</li> <li>• for marketing purposes</li> <li>• to carry out affordability reviews</li> <li>• to respond to your queries and complaints</li> <li>• to administer offers, competitions and promotions</li> <li>• transactional analysis</li> <li>• for arrears, debt recovery and debt sale activities, including where we need to trace your whereabouts</li> <li>• for internal reporting purposes</li> <li>• where the companies provide services to each other</li> <li>• for the detection, prevention, and prosecution of crime</li> <li>• to enable assessment of lending risks by considering all the products you have across the group of companies. This may include consideration of previous product payment history to help us assess your income and expenditure and</li> </ul>	<p>Identity data Contact data Profile data Financial data Identification data Criminal data Communication data Special Category data</p>	<p>Legitimate Interest  Legal obligation</p>

Activity	Purpose	Types of Personal Information	Legal Basis for processing your information
	<p>we may periodically update this information to enable us to make responsible lending decisions.</p> <ul style="list-style-type: none"><li>• information obtained if you consented to using open banking</li></ul>		

## Credit Reference and Fraud Prevention Agencies

### Credit Reference Agencies

In order to process your application, we will perform credit and identity checks on you with one or more Credit Reference Agencies (“CRAs”).

To do this, we will supply your personal data to the CRAs and they will give us information about you. This will include information from your credit application, your financial situation and financial history. The CRAs will supply to us both public (including the electoral register) and shared credit information including fraud prevention information.

We will use this information to:

- Assess your creditworthiness and whether you can afford to take the product;
- Verify the accuracy of the data you have provided to us;
- Prevent criminal activity, fraud and money laundering;
- Manage your account(s);
- Trace and recover debts; and
- Ensure any offers provided to you are appropriate to your circumstances.

We will continue to exchange information about you with CRAs while you have a relationship with us. We will also inform the CRAs about your settled accounts. If you

borrow and do not repay in full and on time, CRAs will record the outstanding debt and any default. This information may be supplied to other organisations by CRAs.

When we complete a search for any information about you at any CRA, they will place a search footprint on your credit file that may be seen by other lenders and gambling organisations. Where we have an existing relationship with you, we may rely upon information we already hold upon you, to assess applications by you for further lending on existing and other products we offer. This will not result in another search footprint appearing on your credit file.

If you are making a joint application, or tell us that you have a financial associate, we will assess your application based on the records of yourself and your financial associate where appropriate. You should make sure you discuss this with them, and share with them this information, before lodging the application. CRAs will also link your records together and these links will remain on yours and their files until such time as you or your financial associate successfully files for a disassociation with the CRAs to break that link.

Where you have made an eligibility enquiry or an application for a product, only where we have your permissions, will we obtain information about your credit file from the credit reference agency. We may use your information and that of any of your financial associates to review your

credit file and tell you about other similar Vanquis products and services and those of the Vanquis Banking Group that you may be eligible for. We may do so for up to three years.

We may also obtain information from your credit file and use it, only where we have your permissions, to enhance our understanding of our customers' needs and to help us develop products and services to meet these. This may contain credit information about you for up to seven years from the date of your last contact with us. Your credit file and your ability to obtain credit elsewhere will not be affected by this activity. You have the right to tell us to cease using your data for these purposes (see the section: 'Your data subject rights and how to exercise them').

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 data, data retention periods and your data protection rights with the CRAs are explained in more detail on the Credit Reference Agency Information Notice ('CRAIN'), which may be accessed via the links to the CRAs detailed below.

- TransUnion (formerly Callcredit): <https://www.transunion.co.uk/crain>
- Experian: <https://www.experian.co.uk/crain>
- Equifax: <https://www.equifax.co.uk/crain>

We may also use services from TransUnion for purposes not described in the CRAIN, such as fraud prevention and identity verification. Full details of these purposes are contained in TransUnion's privacy notice, which you can find at [www.transunion.co.uk/legal-information/bureau-privacy-notice](http://www.transunion.co.uk/legal-information/bureau-privacy-notice)

## **Fraud Prevention Agencies**

Before we provide services, goods or financing to you, we undertake checks for the purposes of preventing fraud, money laundering and terrorist financing, and to verify your identity. These checks require us

to process personal data about you.

The personal data you have provided, we have collected from you, or we have received from third parties will be used to prevent fraud and money laundering, and to verify your identity.

Details of the personal information that will be processed include, for example:

- full name
- title
- address and address history
- date of birth
- contact details
- financial information
- employment details
- device identifiers, including IP address
- vehicle details

We and fraud prevention agencies may also enable law enforcement agencies to access and use your personal data to detect, investigate and prevent crime.

We process your personal data on the basis that we have a legitimate interest in preventing fraud and money laundering, and to verify identity, in order to protect our business and to comply with laws that apply to us. Such processing is also a contractual requirement of the services or financing you have requested.

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

## **Automated Decisions**

- As part of the processing of your personal data, decisions may be made by automated means. This means we may automatically decide that you pose a fraud or money laundering risk if our processing reveals your behaviour to be consistent with money laundering or known fraudulent conduct, or is inconsistent with your previous



submissions, or you appear to have deliberately hidden your true identity. You have rights in relation to automated decision making: if you want to know more, please contact us.

### **Consequences of Processing**

- If we, or a fraud prevention agency, determine that you pose a fraud or money laundering risk, we may refuse to provide the services or financing you have requested, or to employ 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 others refusing to provide services, financing or employment to you. If you have any questions about this, please contact us.

### **Data Transfers**

Fraud prevention agencies may allow the transfer of your personal data outside of the UK. This may be to a country where the UK Government has decided that your data will be protected to UK standards, but if the transfer is to another type of country, then the fraud prevention agencies will ensure your data continues to be protected by ensuring appropriate safeguards are in place.

### **Your Rights**

- Your personal data is protected by legal rights, which include your rights to object to our processing of your personal data, request that your personal data is erased or corrected, and request access to your personal data.
- For more information or to exercise your data protection rights, please contact us.
- You also have a right to complain to the Information Commissioner's Office, which regulates the processing of personal data.

With fraud prevention or law enforcement agencies, in the event false or inaccurate information is provided and fraud or

money laundering is identified. We and other organisations will also access and use this information to prevent fraud and money laundering, for example when checking details on applications for credit and credit related and other facilities, managing credit and credit-related accounts or other facilities, recovering debt, checking details on proposals and claims for all types of insurance, and checking details of job applicants and employees.

We will request that information held by credit reference and fraud prevention agencies, other industry participants be disclosed to us and other organisations to, for example:

- Prevent fraud and money laundering, for example by checking details on applications for credit and credit-related or other facilities, proposals and claims for all types of insurance and job applications and employee records
- To identify you when you contact us or visit our website, and to prevent and detect fraud or money laundering. This may involve the use of voice detection technology to analyse recordings of your telephone calls with us
- Recover debts that you owe and trace your and the goods whereabouts
- Manage credit accounts and other facilities
- Verify your identity
- Make decisions on credit, insurance and other facilities about you, your financial associate(s), members of your household or your business
- Carry out statistical analysis to help with decisions about credit and account management

## Using your data for direct marketing

Based upon the specific instructions that you give us, we may use your personal data to tell you about relevant products, offers and services from Vanquis Bank Limited, other companies within Vanquis Banking Group and relevant third parties (as described in this Privacy Notice).

This could include promotional offers, extension of credit limits or additional finance opportunities, competitions, prize draws, helpful content and financial products or services relevant to you as a customer.

We will always tailor the direct marketing that we send to you to reflect the instructions that you gave to us when you first became a customer, as well as incorporating any amendments you have made to those instructions since.

We may send you marketing via email, SMS, app push notification or messages in our app dependent upon the specific instructions that you have given us.

We rely on a legitimate interest (when we have a business or commercial reason to use your information) to send marketing to you by post, over the phone or through social media channels.

When we advertise our products and services on the internet, we may share your information with our marketing partners. This includes social media platforms so they can check if you hold an account with them. If you do they may use your information to allow us to show adverts to you as part of your social media feeds. They may also use your information so we exclude you from adverts that would not be relevant to you, or to allow us to share adverts with people with a similar profile to you. If you do not want us to share your information with advertising partners and social media companies in this way, please email us at [datarightsteam@vanquisbank.co.uk](mailto:datarightsteam@vanquisbank.co.uk).

You can ask us to stop sending you marketing messages by contacting us at any time, although you will still receive statements and other important information such as changes to your existing products and services.

If you have previously applied for a Vanquis Bank product, we may contact you after six months to let you know about similar products and promotional offers. It may be that your circumstances have changed and/or you may be eligible for an alternative product. We will follow up further with you for a period of two years for this purpose. We will always base these communications upon the instructions that you gave us when you first applied for a Vanquis product.

If you are not currently a customer of Vanquis, you may receive postal marketing from us. We work with Experian Marketing Services to identify individuals who may be interested in our products.

To do this we may create a profile, using demographic data, which we share with Experian Marketing Services. They use this to select prospective customers based on permissions they hold and create a mailing list for us.

If you would like more information on how Experian's Marketing Services business obtain and process your personal data, please visit their Consumer Information Portal: [www.experian.co.uk/cip](http://www.experian.co.uk/cip)

You can change your mind and update your choices at any time by using the "unsubscribe" or "opt out" option in any marketing communication you receive from us or by contacting us.

## Sharing your personal data

When necessary, we may share your personal data with:

- Service providers
- Tax, government, and other regulatory bodies

- Fraud prevention and law enforcement agencies
- Industry databases such as Cifas and National Hunter - you can learn more about how these databases use your personal data here: <https://www.cifas.org.uk/fpn> and <https://nhunter.co.uk/privacy-policy>
- Prosecuting authorities and courts and other third parties connected with legal proceedings or claims
- Third parties where you have asked us to share your information
- Third parties that allow us to operate and deliver competitions and prize draws that we might run.
- Third parties where it is necessary to enter into or support the performance of a contract
- Third parties where we are required to do so by law
- Third parties for marketing and suppression purposes
- Social media platforms for targeting and profiling purposes
- Credit Reference Agencies (CRAs) for performing credit, identity and fraud prevention checks against public information such as the electoral register and shared credit information

All companies we work with are assessed to ensure their security controls are satisfactory to ensure your personal data remains safe.

Please see the section 'Categories of supplier' for a full list of suppliers we may share your data with for our business purposes.

## **Transferring your personal data outside the UK & European Economic Area**

Your personal data may be transferred to or stored in locations outside the European Economic Area (EEA) and the UK.

We will only transfer your data when:

- we're required or permitted to by law or regulatory requirements
- we're sharing data with a third party to support us with the management of your account.

When transferring data overseas, we make sure that suitable protection is always in place. This could be by:

- Ensuring that we transfer personal data to countries that the Information Commissioner (ICO) has confirmed provides the right levels of protection
- Putting suitable clauses in our contracts so that organisations take the right steps to give personal data the same protection it has in the EEA or the UK.

If you would like more information about protecting your data overseas, please visit <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/international-transfers/>

## **Retaining your personal data**

We will keep your personal data for as long as we need it, which for most data is usually for the time you are an active customer, plus a further 6 years.

We will keep your personal data for the following reasons:

- for the activities described in the section 'How we use your personal data'
- to meet our legal or regulatory obligations
- to handle any legal claims

If you would like more information on this, refer to the section 'Contact us' in this document.

## Automated decision-making and profiling

There may be circumstances where we use your data to carry out automated decision-making and profiling. You can see more information about what automated decision-making and profiling is at <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/individual-rights/automated-decision-making-and-profiling/>

We've provided more information below about the different ways in which we may use automated decision-making and profiling.

We use automated decision making or profiling to:

### Applications

- check that we can enter into an agreement with you
- carry out our legal and regulatory obligations (e.g., when complying with UK money laundering regulations)
- carry out checks to assess if your account is being used or suspected to be used for fraud
- carry out credit scoring, which uses past data to assess how you are likely to act when paying back any money you borrow (this includes data about similar accounts you may have had before).

### Account Management

- determine the appropriate action to take, where your account has gone into arrears or default
- place you in groups with similar customers. These are called customer segments. We use these to study and learn about our customers' needs, and to make decisions based on what we learn. This helps us to design products, services and offers for different customer segments, and to manage our relationships with them

- assess and amend the credit limit of your credit card account, based on your account behaviour. We will give you notice of our intention to amend your limit and you will have the ability to request an increase or reduction to this
- carry out checks to assess if your account is being used or suspected to be used for fraud

### Marketing Related Activities

- identify your suitability for products and services we offer and to inform you of these

### Social Media

- ask external companies we work with, such as social media platforms, to find groups of people who are similar to you to allow us to market to them. These companies help us look for new customers who may be interested in products, services or offers that our existing customers are interested in. This helps us tailor the marketing that individuals receive or are shown on our own and other websites and mobile apps, including social media. It also helps us to design products, services and offers for different customer groups, and to manage our relationships with them.

We will tell you where we make such decisions, and you have the right to ask for these to be reconsidered manually.

## Your data subject rights and how to exercise them

You have rights relating to the personal data we hold about you, but they may be subject to various exemptions and limitations. We recommend clicking the following link for more information on your rights:

<https://ico.org.uk/global/privacy-notice/your-data-protection-rights/>

## Your Rights

**Right to be informed:** We provide you with data privacy notices throughout your relationship with us, so you can understand how we use your data.

**Right of access to your personal data, commonly known as a Data Subject Access Request (DSAR):** You can request a copy of the personal data we hold about you.

**Right to request your personal data is corrected:** If you believe that we hold inaccurate or incomplete personal data, you have the right to ask us to correct it for you.

**Right to request your personal data is deleted:** You may ask us to delete your personal data where there is no good reason for us to continue to hold it.

**Right to object:** You have the right to object to us using your personal data where:

- it is being used for a legitimate business need
- it is being used for direct marketing

**Right to request we restrict using your personal data:** You may ask us to stop using your personal data, if we agree, we will still hold the data but will not use it any further.

**Right to data portability:** In certain circumstances you may request that your personal data is transferred to another company.

**Right to withdraw consent:** If you have given us your consent to use your personal data for a specific activity, you may withdraw that consent at any time.

**Right to make a complaint:** If you wish to raise a complaint on how we have handled your personal data, you can contact [datarightsteam@vanquisbank.co.uk](mailto:datarightsteam@vanquisbank.co.uk) who will investigate the matter. If you are not satisfied with our response,

you can complain to the Information Commissioner's Office (ICO) - <https://ico.org.uk/make-a-complaint>

## How to exercise your rights

The simplest and quickest way is by completing our online request form – please contact us for details on how to access this.

Alternatively, you can request to exercise your rights using the following methods below:

### If you are a Vanquis credit card or loan customer:

- by phone on: 0330 099 3000
- by email: [datarightsteam@vanquisbank.co.uk](mailto:datarightsteam@vanquisbank.co.uk)
- by post: Data Rights Team, Vanquis Bank, PO Box 399, Chatham, ME4 4WQ

### If you are a Vanquis savings customer:

- by phone on: 0191 505 0033
- by post: Vanquis Bank Savings, Freepost RUGA-ZTJL-HBTJ, PO Box 967, Wallsend, NE28 5FD

## Making a data protection complaint

If you have any concerns about the use of your personal information or the way we handle your requests relating to your rights, you can raise a complaint directly with us by using the following contact details:

### If you are a Vanquis credit card or loan customer:

- submit a complaint using our online complaints form which you can find at: <https://complaints.vanquis.com/s/vanquis>
- by post: Customer Care Team, Freepost RSBJ-HULA-XLGG, PO Box 399, Chatham, ME4 4WQ

### If you are a Vanquis savings customer:

- by phone on: 0191 505 0033
- by post: Vanquis Bank Savings, Freepost RUGA-ZTJL-HBTJ, PO Box 967, Wallsend, NE28 5FD

If you are not satisfied with the way we handle your complaint, you are entitled to raise a complaint directly with the UK Information Commissioner's Office via the following link:

<https://ico.org.uk/make-a-complaint>

## Contact us

If you have any questions about how we collect, use, process, or share your data, please contact us by:

### If you are a Vanquis credit card or loan customer:

- by phone on: 0330 099 3000
- by email: [datarightsteam@vanquisbank.co.uk](mailto:datarightsteam@vanquisbank.co.uk)
- by post: Data Rights Team, Vanquis Bank, PO Box 399, Chatham, ME4 4WQ

### If you are a Vanquis savings customer:

- by phone on: 0191 505 0033
- by post: Vanquis Bank Savings, Freepost RUGA-ZTJL-HBTJ, PO Box 967, Wallsend, NE28 5FD

## Relevant third parties

This includes financially related products or services such as insurance, lending, savings and investments, money saving/financial management websites or providers who can help you save money on products and services as a Vanquis customer such as retail, telecommunications, utilities, groceries, household products and hospitality.

## Categories of supplier

- Communications providers- mail, email, and SMS providers
- Competition and events organisers
- Credit Reference Agencies
- Customer Service Function providers
- Debt Collection Agencies
- Fraud Prevention Agencies
- IT consultants
- IT service providers
- Legal Service providers
- Management consultants
- Market Benchmarking service providers
- Market research companies
- Digital Marketing service providers
- Digital service providers
- Direct Marketing service providers
- Marketing Insight service providers
- Marketing partners (including social media platforms)
- Other companies in the Vanquis Banking Group
- Partner banks and other lending institutions
- Payment processors
- Professional Service firms
- Risk consultancy services
- Software providers
- Transcription service providers
- Web analytics service providers
- App analytics service providers
- Web hosting service providers

## Keeping this notice up to date

We regularly review and, where necessary, update the information contained within this notice.

This notice was last updated on 19th January 2026



**[www.vanquis.com](http://www.vanquis.com)**

\* Please note that we may monitor and record telephone calls for training, security and monitoring purposes.

\*\* We will respond to your emails within 2 business days.

Vanquis Bank Savings is issued by Vanquis Bank Limited, registered in England & Wales with company number 02558509, with its registered office at Fairburn House, 5 Godwin Street, Bradford, BD1 2AH. Vanquis Bank Limited is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority and is entered in the Financial Services Register under number 221156.

Details are correct as at time of print (January 2026). VAN031