

AutoMoney Trust Limited: Privacy Notice

Last updated February 2026

1. Who we are

- 1.1 This privacy notice (the “**Notice**”) applies to all information we collect, use, and process in relation to the products (including hire purchase agreements) and services (including credit broking) you receive from AutoMoney Trust Limited (“**AutoMoney**”). This includes information about customers, prospective customers, and any other individuals who provide personal information to us or whose information we may receive in connection with our business activities.
- 1.2 AutoMoney is a data controller in respect of personal information that we process in connection with our business (including the products and services that we provide). In this notice, references to “**we**”, “**us**”, or “**our**” are references to AutoMoney.
- 1.3 Our registered address is **25-27 Surrey Street, Norwich, Norfolk, NR1 3NX**.
- 1.4 Our office address is **Unit 3 Brooklands, Moons Moat Drive, Redditch, B98 9DW**.
- 1.5 Our contact details can be found at <https://www.automoneytrust.co.uk/complaints-policy/>.
- 1.6 We are a member of the Norfolk Capital Group. More information about the Norfolk Capital Group can be found at <https://www.norfolkcapital.co.uk>.
- 1.7 We are authorised and regulated by the Financial Conduct Authority under [Firm Reference Number 912573](#).
- 1.8 We are registered as a data controller with the Information Commissioner’s Office under registration number ZA761449.
- 1.9 We respect individuals’ rights to privacy and to the protection of personal information. The purpose of this Notice is to explain how we collect and use personal information in connection with our business. “Personal information” means information about a living individual who can be identified from that information (either by itself or when it is combined with other information).

2. The information we process

- 2.1 We collect and process various categories of personal and confidential information at the start of, and for the duration of, your relationship with us and beyond (subject to appropriate retention periods as set out in *Section 12* of this Notice). We will limit the collection and processing to information necessary to achieve one or more legitimate purposes as identified in this Notice. Personal and confidential information may include:
 - a) basic personal information, including name and address, date of birth, contact details, the fact you are our customer;
 - b) financial information, including agreement and transactional information and history;
 - c) information about your financial circumstances, including proof of income and expenditure, and credit and borrowing history;
 - d) employment and business information;
 - e) products and services provided; and
 - f) visual images and personal appearance (such as copies of passports), and voice recordings.
- 2.2 We may process certain special categories of personal data where it is necessary, proportionate and lawful to do so. This may occur, for example, where processing is required:
 - to detect and prevent financial crime;
 - meet our regulatory obligations;
 - support customers in vulnerable circumstances;
 - make our services accessible; or
 - establish, exercise, or defend legal claims.

AutoMoney Trust Limited is authorised and regulated by the Financial Conduct Authority under Firm Reference Number 912573. Registered in England and Wales under company registration number 11331546. Registered Office: 25-27 Surrey Street, Norwich, Norfolk, NR1 3NX. Registered with the Information Commissioner’s Office under registration number ZA761449. Business and commercial hire purchase agreements are unregulated and therefore fall outside the scope of the Consumer Credit Act 1974 and FCA regulation. AutoMoney Trust Limited is a limited company and is not a trust or trustee in the legal or financial services sense.

In some cases, individuals may choose to provide sensitive information to us voluntarily during their interactions with us. The voluntary provision of such information does not, by itself, mean that we will process it. We will only process special category data where we have identified a valid lawful condition under data protection law, such as where we have obtained your explicit consent or where processing is otherwise legally permitted.

Where special category data is provided unexpectedly or is not required for the purpose for which it was shared, we will take reasonable steps to limit its use and, where appropriate, securely delete it. Any such processing will be limited to the purposes for which the information was provided or otherwise permitted by law.

Special category data may include information revealing:

- racial or ethnic origin;
- political opinions;
- religious or philosophical beliefs;
- trade union membership;
- data concerning health;
- genetic data;
- biometric data used for identification; or
- data concerning a person's sex life or sexual orientation.

We do not routinely process this information and will only do so where it is strictly necessary and proportionate to do so.

Where we engage third-party service providers to process personal information on our behalf, we require them to implement appropriate safeguards and to process such information in accordance with data protection law.

Some third-party services that we make available - including certain artificial intelligence-enabled tools - may operate as independent data controllers. Where this is the case, the third party is responsible for its own processing activities, and its privacy notice will apply. We do not disclose special category data to such providers unless it is necessary, lawful, and we are permitted to do so.

- 2.3 Where permitted by law we may process information about criminal convictions, criminal offences, alleged offences including unproven allegations, or spent or previous convictions.
- 2.4 Where you have provided your consent for us to process your special category data, you can change it any time by contacting us:

by post: **Unit 3 Brooklands, Moons Moat Drive, Redditch, B98 9DW**
by email: complaints@automoneytrust.co.uk

3. How we obtain information

- 3.1 Your information is made up of all the financial and personal information we collect and hold about you. It includes:

- a) information you give to us;
- b) information that we receive from third parties including:
 - i) third parties who provide services to you or us;
 - ii) credit reference, fraud prevention, law enforcement, or government agencies; industry and trade bodies; and
 - iii) other lenders or brokers (where permitted by law);
- c) information that we learn about you through our relationship with you;
- d) information that we gather through cookies or similar tracking tools when you use our website; and
- e) information that we gather from publicly available sources, such as the press, the electoral register, company registers, and online search engines. Information that you make public on social media e.g. Facebook, Twitter.

4. Your rights

- 4.1 We want to make sure you are aware of your rights in relation to the personal information we process about you. We have described those rights and the circumstances in which they apply in *Table A*.
- 4.2 If you wish to exercise any of these rights, if you have any queries about how we use your personal information that are not answered here, or if you wish to complain, please contact us:

by post: **Unit 3 Brooklands, Moons Moat Drive, Redditch, B98 9DW**
 by email: complaints@automoneytrust.co.uk

Alternatively, please use our online complaints process which can be found at <https://www.automoneytrust.co.uk/complaints-policy/>.

4.3 Please note that in some cases, if you do not agree to the way we process your information, it may not be possible for us to continue our relationship with you.

Table A – Your Rights

Rights	Description
Access – You have a right to get access to the personal information we hold about you.	<p>If you would like a copy of the personal information we hold about you, or for more information on how to get access to your information please contact us:</p> <p>by post: Unit 3 Brooklands, Moons Moat Drive, Redditch, B98 9DW</p> <p>by email: complaints@automoneytrust.co.uk</p>
Rectification – You have a right to rectification of inaccurate personal information and to update incomplete personal information.	<p>If you believe that any of the information that we hold about you is inaccurate, you have a right to request that we restrict the processing of that information and to rectify the inaccurate personal information.</p> <p>Please note that if you request us to restrict processing your information, we may have to suspend the operation of the products and services we provide to you.</p>
Erasure – You have a right to request that we delete your personal information.	<p>You may request that we delete your personal information if you believe that:</p> <ul style="list-style-type: none"> • we no longer need to process your information for the purposes for which it was provided; • we have requested your permission to process your personal information where required for a particular purpose and you wish to withdraw your consent; or • we are not using your information in a lawful manner. <p>Please note that if you request that we delete your information, we may have to suspend the operation of the products and services we provide to you.</p>
Restriction – You have a right to request that we restrict the processing of your personal information.	<p>You may request that we restrict processing your personal information if you believe that:</p> <ul style="list-style-type: none"> • any of the information that we hold about you is inaccurate; • we no longer need to process your information for the purposes for which it was provided, but you require the information to establish, exercise, or defend legal claims; or • we are not using your information in a lawful manner. <p>Please note that if you request that we restrict processing your information, we may have to suspend the operation of the products and services we provide to you.</p>
Portability – You have a right to data portability.	<p>Where we have requested your permission to process your personal information or you have provided us with information for the purposes of entering into a contract with us, you have a right to receive the personal information you provided to us in a portable format.</p> <p>You may also request us to provide it directly to a third party, if technically feasible. We are not responsible for any such third party's use of your account information, which will be governed by their agreement with you and any privacy statement they provide to you.</p> <p>If you would like to request the personal information you provided to us in a portable format, please contact us:</p> <p>by post: Unit 3 Brooklands, Moons Moat Drive, Redditch, B98 9DW</p> <p>by email: complaints@automoneytrust.co.uk</p>

Rights	Description
Objection – You have a right to object to the processing of your personal information.	You have a right to object to us processing your personal information (and to request us to restrict processing) for the purposes described in <i>Section C</i> of <i>Schedule A</i> of this Notice, unless we can demonstrate compelling and legitimate grounds for the processing, which may override your own interests, or where we need to process your information to investigate and protect us or others from legal claims. Depending on the circumstances, we may need to restrict or cease processing your personal information altogether or, where requested, delete your information. Please note that if you object to us processing your information, we may have to suspend the operation of the products and services we provide to you
Marketing – You have a right to object to direct marketing.	You have a right to object at any time to processing of your personal information for direct marketing purposes, including profiling you for the purposes of direct marketing. For more information see <i>Section 9</i> of this Notice.
Withdraw consent – You have a right to withdraw your consent.	Where we rely on your permission to process your personal information, you have a right to withdraw your consent at any time. We will always make it clear where we need your permission to undertake specific processing activities.
Lodge complaints – You have a right to lodge a complaint with the regulator.	If you wish to raise a complaint on how we have handled your personal information, please use our online complaints process which can be found at https://www.automoneytrust.co.uk/complaints-policy/ . Alternatively, you can contact us: by post: Unit 3 Brooklands, Moons Moat Drive, Redditch, B98 9DW by email: complaints@automoneytrust.co.uk We hope that we can address any concerns you may have, but you can always contact the Information Commissioner’s Office. For more information, visit www.ico.org.uk .

5. Changes to the way we use your information

- 5.1 From time to time we may change the way we use your information. When we do, we will publish the updated Privacy Notice on our website. We would encourage you to visit our website regularly to stay informed of the purposes for which we process your information and your rights to control how we process it.
- 5.2 Where we believe you may not reasonably expect such a change, we will notify you and will allow a period of at least 30 days for you to raise any objections before the change is made. However, please note that in some cases, if you do not agree to such changes, it may not be possible for us to continue to provide certain products and services to you. Where relevant, we may also include further details or information in relation to a particular service or activity at the point information is collected or the product or service is considered.

6. How we use and share your information with other Norfolk Capital Group companies

- 6.1 We will only use and share your information with other Norfolk Capital Group companies where it is necessary for us to lawfully conduct our business activities. We want to ensure that you fully understand how your information may be used. We have described the purposes for which your information may be used in detail in *Schedule A* below.

7. Sharing with third parties

- 7.1 We will not share your information with anyone outside of AutoMoney except:
- where we have your permission;
 - where required, whether directly or indirectly, to provide or administer your product or service (including credit broking);

- c) with law enforcement agencies, courts, government entities, tax authorities, regulatory authorities, or trade bodies, where permitted by law;
- d) with other lenders, brokers, or relevant third-parties for the purpose of preventing, detecting, investigating, or reporting fraud, financial crime, or other criminal activity;
- e) with fraud prevention agencies, including CIFAS and National Hunter, for the purpose of fraud prevention, identify verification, and money laundering detection. If fraud is identified, you may be refused certain services, finance, or employment. These agencies may also share your information with law enforcement agencies to prevent and detect crime;
- f) third parties who provide services to us where such sharing is necessary for the operation of our business, compliance with our legal or regulatory obligations, or the performance of our contractual duties. These include:
 - i. providers of artificial intelligence and automated communication tools used to support customer engagement, service delivery, quality assurance, and operational activities;
 - ii. agents and sub-contractors acting on our behalf, including companies that print customer communications;
 - iii. market analysis and benchmarking providers;
 - iv. third-party tracing agents, field visit providers, and customer re-engagement service providers; and
 - v. third parties supporting the management of arrears, default, or recovery of sums owed in connection with products or services provided to you;
- g) with credit reference agencies and with third parties in relation to debt collection and related activities, including arrears management, recovery, litigation, enforcement, and asset recovery, and including solicitors, legal advisers, and enforcement agents;
- h) where required for a proposed or actual sale, reorganisation, transfer, funding arrangement, financial arrangement, asset disposal or other transaction relating to our business and/or assets held by our business, where such data is shared with a third party it is done so under strict duties of confidentiality;
- i) where required by our funders, who may share your information with their funders and professional advisers, and in each case to their professional advisers, where such data is shared with a third party it is done so under strict duties of confidentiality;
- j) in anonymised form as part of statistics or other aggregated data shared with third parties; or
- k) where permitted by law, it is necessary for our legitimate interests or those of a third party, and such interests are not overridden by your rights and freedoms, and it is not inconsistent with the purposes listed above.

Where we share your information with third parties, they are required to keep it secure and to use it only for the purposes for which it is shared. Some third parties act as data processors on our instructions, while others may act as independent data controllers where required by law, such as solicitors or enforcement agents.

7.2 If you have been introduced to us by a third party, for example a credit broker or price comparison website, we may disclose information concerning the progress of your application to them, whether you have been successful, and details of the loan or agreement entered into. Where the loan application is declined, we may inform the broker of the reasons why. The broker may be informed about the performance of your loan for the purpose of recovering costs from them.

7.3 In addition to the above, we may share your personal information with brokers via WhatsApp for the purposes of providing you with the services you have requested. This will be done under the following conditions:

- a) where we have a legitimate interest in using efficient communication tools, such as WhatsApp, to facilitate the provision of our services and to ensure timely and effective communication with brokers; and/or
- b) where sharing your data with brokers via WhatsApp may be necessary to perform our contract with you, particularly when arranging finance for your vehicle.

WhatsApp is operated by Meta, which may process data outside the UK; appropriate safeguards are relied upon.

8. Transferring information overseas

- 8.1 We may transfer your information to organisations in other countries, including fraud prevention agencies such as CIFAS and National Hunter, which may process your data outside the UK. If your data is transferred to a country without an adequacy decision under UK data protection laws, appropriate safeguards will be put in place to ensure your data remains protected.
- 8.2 In the event that we transfer your information to countries outside of the UK and European Economic Area (which includes countries in the European Union as well as Iceland, Liechtenstein, and Norway), we will only do so where:
- a) the UK has decided that the country or the organisation we are sharing your information with will protect your information adequately;
 - b) the transfer has been authorised by the relevant data protection authority; or
 - c) we have entered into a contract with the organisation with which we are sharing your information (on terms approved by the UK) to ensure your information is adequately protected.

9. Marketing information

- 9.1 Unless you have told us that you do not want to hear from us, we may send you relevant marketing information (including details of other products or services provided by us), by mail, phone, text, and other forms of electronic communication. If you change your mind about how you would like us to contact you or you no longer wish to receive this information, you can change your preferences at any time by contacting us:
- by post: **Unit 3 Brooklands, Moons Moat Drive, Redditch, B98 9DW**
by email: complaints@automoneytrust.co.uk
- 9.2 Where electronic marketing requires consent under PECR, we will only send such communications where you have provided valid consent.

10. Direct Marketing and Credit Broking Activities

- 10.1 If you are an existing customer and do not meet our criteria for finance, we may refer you to one of our broker partners. With your consent, we will share your personal information with the broker partner, and your data will then be subject to that broker's Privacy Notice.
- 10.2 Additionally, we may market directly to our existing customers where we have valid marketing consent. This direct marketing may include information about products and services provided by us, and it will be conducted in accordance with your preferences and consent.

11. Communications about your account

- 11.1 We will contact you with information relevant to the operation and maintenance of your account (including updated information about how we process your personal information), by a variety of means including email, text message, post, and/or telephone. If at any point in the future you change your contact details, you should tell us promptly about these changes.
- 11.2 We may monitor or record calls, emails, text messages, or other communications in accordance with applicable laws for the purposes outlined in *Schedule A* below.
- 11.3 We may contact you if we have concerns about your economic wellbeing and offer support.

12. Credit reference agencies and fraud prevention agencies

- 12.1 We may access and use information from credit reference agencies and fraud prevention agencies to:
- a) manage and take decisions about your account, including assessing credit worthiness and checks to avoid customers becoming over-indebted;
 - b) prevent criminal activity, fraud, and money laundering;
 - c) check your identity and verify the accuracy of the information you provide to us; and
 - d) trace debtors and recover debts.

- 12.2 If you are making a joint application or tell us that you have a spouse or financial associate, we will link your records together, so you should make sure you discuss this with them, and share with them this information, before lodging the application. Credit reference agencies will also link your records together and these links will remain on your and their files until such time as you or your partner successfully files for a disassociation with the credit reference agencies to break that link.
- 12.3 Application decisions may be taken based solely on automated checks of information from credit reference and fraud prevention agencies and internal AutoMoney records. To help us make decisions on when to give you credit, we use a system called credit scoring to assess your application. To work out your credit score, we look at information you give us when you apply; information from credit reference agencies that will show us whether you've kept up to date with payments on any credit accounts (that could be any mortgages, loans, credit cards or overdrafts), or if you've had any court action such as judgments or bankruptcy; your history with us such as maximum level of borrowing; and affordability, by looking at your available net income and existing debts. You have rights in relation to automated decision-making, including a right to appeal if your application is refused. You can appeal via our normal complaints process which can be found here: <https://www.automoneytrust.co.uk/complaints-policy/>.
- 12.4 We will continue to share information with credit reference agencies about how you manage your account including your account balance, payments to your account and any arrears or default in making payments, while you have a relationship with us. This information will be made available to other organisations (including fraud prevention agencies and other financial institutions) so that they can take decisions about you, your associates, and members of your household.
- 12.5 If false or inaccurate information is provided and/or fraud is identified or suspected, details will be passed to fraud prevention agencies. Law enforcement agencies and other organisations may access and use this information. 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.
- 12.6 If we, or a fraud prevention agency, determine that you pose a fraud or money laundering risk, we and others may refuse to provide the services and financing you have requested, to employ you, or we may stop providing existing services to you.
- 12.7 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. Fraud prevention agencies can hold your information 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.
- 12.8 Our *Fair Processing Notice for the Purposes of Fraud Prevention Detection* can be found in *Schedule B*, below.
- 12.9 If you would like a copy of your information held by the credit reference and fraud prevention agencies we use, or if you want further details of how your information will be used by these agencies, please visit their websites or contact them using the details below. The agencies may charge a fee.

Credit Reference Agency/ Fraud Prevention Agency	Contact Details
Equifax Limited www.equifax.co.uk/crain	Post: Equifax Ltd, Customer Services Centre, PO Box 10036, Leicester, LE3 4FS Web: www.equifax.co.uk/ask Phone: 0333 321 4043 or 0800 014 2955
Experian Limited www.experian.co.uk/crain	Post: Experian, PO Box 9000, Nottingham, NG80 7WF Email: consumer.helpservice@uk.experian.com Web: https://ins.experian.co.uk/contact Phone: 0344 481 0800 or 0800 013 8888
TransUnion International UK Limited www.transunion.co.uk/crain	Post: Consumer Service Team, PO Box 491, Leeds, LS3 1WZ Web: www.transunion.co.uk Phone: 0330 024 7579

CIFAS www.cifas.org.uk/fpn	Post: Consumer Affairs, CIFAS, 6th Floor Lynton House, 7-12 Tavistock Square, London, WC1H 9LT Web: www.cifas.org.uk Phone: 0330 100 0180
National Hunter www.nhunter.co.uk	Post: National Hunter, PO Box 4744, Stone, ST15 9FE

13. How long we keep your information

- 13.1 By providing you with products or services, we create records that contain your information, such as customer account records, activity records, tax records and lending and credit account records. Records can be held on a variety of media (physical or electronic) and formats.
- 13.2 We manage our records to help us to serve our customers well (for example for operational reasons, such as dealing with any queries relating to your account) and to comply with legal and regulatory requirements. Records help us demonstrate that we are meeting our responsibilities and to keep as evidence of our business activities.
- 13.3 Retention periods for records are determined based on the type of record, the nature of the activity, product, or service and the applicable local legal or regulatory requirements. We normally keep customer account records for up to six years after your relationship with the us ends, whilst other records are retained for shorter periods. Fraud prevention agencies, including CIFAS and National Hunter, may also retain fraud-related data for up to six years. If you are considered to pose a fraud or money laundering risk, this information may continue to affect your ability to obtain financial services in the future. Retention periods may be changed from time to time based on business or legal and regulatory requirements.
- 13.4 We may, on exception, retain your information for longer periods, particularly where we need to withhold destruction or disposal based on an order from the courts or an investigation by law enforcement agencies or our regulators. This is intended to make sure that we will be able to produce records as evidence if they are needed.
- 13.5 If you would like more information about how long we keep your information, please contact us:
 by post: **Unit 3 Brooklands, Moons Moat Drive, Redditch, B98 9DW**
 by email: complaints@automoneytrust.co.uk

14. Security

- 14.1 We are committed to ensuring that your information is secure with us and with the third parties who act on our behalf. For more information about the steps, we are taking to protect your information please contact us:
 by post: **Unit 3 Brooklands, Moons Moat Drive, Redditch, B98 9DW**
 by email: complaints@automoneytrust.co.uk

15. Automated processing

- 15.1 The way we analyse data relating to our services may involve profiling. This means that we may process your personal data (including sensitive personal data) using software that can evaluate your personal circumstances and other factors to predict risks or outcomes. We may also use profiling, or other automated methods, to make decisions about you that relate to the following:
- credit and affordability checks to see whether your application will be accepted;
 - anti-money laundering and sanctions checks;
 - identity and address checks;
 - screening people who may be classed as “politically exposed” (for example, if you are a government minister); and/or
 - assessments required by our regulators and appropriate authorities to make sure that we meet our regulatory obligations (for example, making decisions about those at risk of becoming financially vulnerable).
- 15.2 This is known as “automated decision-making” and is only allowed when we have a lawful basis for this type of decision-making. We may make automated decisions about you in the following circumstances:

- a) if automated decisions are necessary for us to enter into a contract. For example, we may decide not to offer our services to you, or how much to charge you for our products, based on your credit history and other financial information we have collected about you;
- b) if automated decisions are required or authorised by law (for example, to prevent fraud); and/or
- c) if it is a reasonable way of complying with regulation or guidance, such as our obligation to act to deliver good outcomes for our customers.

15.3 You have the right:

- a) not to be subject to a decision that is based solely on automated processing if the decision affects your legal rights or other equally important matters, including automatic refusal of a credit application;
- b) to understand the reasons behind decisions made about you by automated processing and possible consequences of the decisions; and
- c) to object to profiling in certain situations, including direct marketing.

15.4 To request human intervention, express your point of view and/or contest an automated decision, please contact us:

- by post: **Unit 3 Brooklands, Moons Moat Drive, Redditch, B98 9DW**
- by email: complaints@automoneytrust.co.uk

16. Use of artificial intelligence and automated tools

16.1 We may use artificial intelligence (“AI”), machine learning, or other automated tools to support the delivery, operation, and improvement of our products and services. These technologies may be provided by us directly or by carefully selected third-party providers, who may act either on our behalf or as independent data controllers depending on the service. These tools are used to support our staff and business processes and are subject to appropriate human oversight.

16.2 AI and automated tools may be used for purposes including, but not limited to:

- a) customer communications, engagement, and support (including digital assistants or web-based chat tools);
- b) improving customer experience and service efficiency;
- c) analysing interactions, enquiries, or feedback to help us understand customer needs and improve our services;
- d) quality assurance, training, and monitoring; and
- e) operational, administrative, or compliance-related activities.

16.3 Where AI-enabled tools are provided by third parties, those providers may act either as data processors on our behalf or, in some cases, as independent data controllers. We undertake appropriate due diligence and require contractual safeguards where applicable to ensure personal information is processed securely, lawfully, and only for permitted purposes.

Some AI-enabled tools that we make available may be operated by independent organisations.

Where you choose to interact with such services, you will be clearly informed that you are engaging with the third party and that their privacy notice will apply.

We do not transfer your personal information to these providers simply by making such tools available. Personal information will only be shared with us by these providers where you have chosen to proceed, have been appropriately informed, and any consent required by law has been obtained.

16.4 We do not use AI systems to make decisions that have legal or similarly significant effects on you unless this is permitted by law and explained elsewhere in this Notice (including in *Section 15* of this Notice). Where automated decision-making is used, you have the rights described in that section, including the right to request human intervention.

16.5 Some AI-enabled services may operate in a way that limits or restricts our access to personal information unless and until you choose to provide consent or interact with the service in a particular way. Where this applies, clear information will be provided to you at the point of use, including details of any third-party Privacy Notices that apply.

16.6 We will not use your personal information to train or develop AI models for the benefit of third parties unless this is permitted by law and you have been appropriately informed or have provided consent where required.

16.7 You may object to certain uses of your personal information involving AI, or exercise any of your data protection rights, by contacting us using the details set out in *Section 4* of this Notice.

Schedule A: Purposes of Processing

We will only use and share your information where it is necessary for us to conduct lawful business activities. Your information may be shared with and processed by other Norfolk Capital Group companies. We want to ensure that you fully understand how your information may be used. We have described the purposes for which your information may be used in detail in the table below:

A - Contractual Necessity

We may process your information where it is necessary to enter into a contract with you for the provision of our products or services or to perform our obligations under that contract. Please note that if you do not agree to provide us with the requested information, it may not be possible for us to continue to provide products and services to you.

This may include processing to:

- a) assess and process applications for products or services;
- b) provide and administer those products and services throughout our relationship with you, including opening, setting up, or closing your agreement, collecting, and issuing all necessary documentation, processing transactions, resolving any queries or discrepancies, and administering any changes. Calls to and from us may be recorded and monitored for these purposes;
- c) manage and maintain our relationship with you and for ongoing customer service;
- d) administer any debts, including agreeing repayment options; and
- e) communicate with you about your agreement or the services you receive from us.

B - Legal Obligation

When you apply for a product or service (and throughout your relationship with us), we are required by law to collect and process certain personal information about you. Please note that if you do not agree to provide us with the requested information, it may not be possible for us to provide products and services to you. This may include processing to:

- a) confirm your identity;
- b) perform checks and monitor transactions data for the purpose of preventing and detecting crime and to comply with laws relating to money laundering, fraud, terrorist financing, bribery and corruption, and international sanctions. This may require us to process information about criminal convictions and offences, to investigate and gather intelligence on suspected financial crimes, fraud, and threats and to share data with law enforcement and regulatory bodies;
- c) assess affordability and suitability of credit for initial credit applications and throughout the duration of the relationship, including analysing customer credit data for regulatory reporting;
- d) share data with police, law enforcement, tax authorities or other government and fraud prevention agencies where we have a legal obligation, including reporting suspicious activity;
- e) deliver mandatory communications to customers or communicating updates to product and service terms and conditions;
- f) investigate and resolve complaints;
- g) conduct investigations into breaches of conduct and internal policies by our employees;
- h) manage contentious regulatory matters, investigations, and litigation;
- i) provide assurance we have effective processes to identify, manage, monitor, and report the risks we are or might be exposed to;
- j) coordinate responses to business-disrupting incidents and to ensure facilities, systems and people are available to continue providing services; and
- k) provide reasonable adjustments.

C - Legitimate Interest

We may process your information where it is in our legitimate interests do so as an organisation or where it is in the legitimate interest of a third party.

- a) We may process your information in the day-to-day running of our business, to manage our business and financial affairs and to protect our customers, employees, and property. It is in our interests to ensure that our processes and systems operate effectively and that we can continue operating as a business. This may include processing your information to:
 - i) monitor, maintain and improve internal business processes, information and data, technology and communications solutions and services;
 - ii) ensure business continuity and disaster recovery and respond to information technology and business incidents and emergencies;
 - iii) ensure network and information security, including monitoring authorised users' access to our information technology for the purpose of preventing cyber-attacks, unauthorised use of our telecommunications systems and websites, prevention or detection of crime and protection of your personal data;
 - iv) provide assurance our material risks and reporting to internal management and supervisory authorities on whether we are managing them effectively;
 - v) perform general, financial, and regulatory accounting and reporting;
 - vi) protect our legal rights and interests; and
 - vii) enable a proposed or actual sale, reorganisation, transfer, or other transaction relating to our business.
- b) It is in our interest as a business to ensure that we provide you with the most appropriate products and services and that we continually develop and improve as an organisation. This may require processing your information to enable us to:
 - i) identify new business opportunities and to develop enquiries and leads into applications or proposals for new business and to develop our relationship with you;
 - ii) send you relevant marketing information. We may show or send you marketing material online (on our own and other websites including social media platforms), or by email, SMS, or post. We will not share your information with third parties for their own marketing purposes;
 - iii) understand our customers' actions, behaviours, preferences, transactions, feedback, and financial history in order to improve our products and services, develop new products and services, and to improve the relevance of offers of products and services offered by us;
 - iv) research your experiences with us and to monitor the performance and effectiveness of products and services;
 - v) assess the quality of our customer services and to provide staff training. Calls to and from us may be recorded and monitored for these purposes;
 - vi) perform analysis on customer complaints for the purposes of preventing errors and process failures and rectifying negative impacts on customers;
 - vii) compensate customers for loss, inconvenience, or distress as a result of services, process, or regulatory failures;
 - viii) combine your information with third party data, such as economic data in order to understand customers' needs better and improve our services; and
 - ix) consider your welfare needs including any adjustments, support or different products or services which might be suitable or protections to put in place.
- c) It is in our interest as a business to manage our risk and to determine what products and services we can offer and the terms of those products and services. It is also in our interest to protect our business and customers and others by preventing financial crime, fraud, and other criminal activities. This may include processing your information to:
 - i) conduct financial and credit risk assessments;
 - ii) manage and take decisions about your products and services;
 - iii) conduct checks (in addition to statutory requirements) on customers and potential customers, business partners and associated persons, including performing adverse media checks, screening against external databases and sanctions lists and establishing connections to politically exposed persons;
 - iv) share data with credit reference, fraud prevention agencies, and law enforcement agencies;

- v) trace debtors and recovering outstanding debt;
- vi) for risk reporting and risk management;
- vii) perform checks, monitoring, and investigation to prevent and detect crime including in relation to money laundering, fraud, terrorist financing, bribery and corruption, trafficking, and international sanctions. It may involve investigating and gathering intelligence on suspected financial crimes, fraud and threats and sharing data with third parties including law enforcement and regulatory bodies;
- viii) responding and participating in industry improvements and consultations; and
- ix) responding to and investigating complaints both raised directly to us or raised through a third party such as a regulatory body.

Schedule B: Fair Processing Notice for the Purposes of Fraud Prevention and Detection

1. General

- 1.1 Before we provide services, goods, or financing to you, we undertake checks for the purposes of preventing fraud and money laundering, and to verify your identity. These checks include the use of fraud prevention agencies such as CIFAS and National Hunter. Your personal information will be shared with these agencies, which may use it to assess fraud risks.
- 1.2 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.
- 1.3 Details of the personal information that will be processed include, for example: name, address, date of birth, contact details, financial information, employment details, device identifiers including IP address and vehicle details.
- 1.4 We and fraud prevention agencies may also enable law enforcement agencies to access and use your personal data to detect, investigate and prevent crime.
- 1.5 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.
- 1.6 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.
- 1.7 As part of the processing of your personal data, decisions may be made by automated means, including through the use of CIFAS and National Hunter fraud prevention systems. If your data indicates a fraud or money laundering risk, an automated decision may result in your application being declined. You have the right to:
 - i) request human intervention in an automated decision;
 - ii) express your viewpoint and contest an automated decision; and
 - iii) request further explanation on how an automated decision was made.

2. Automated Decisions

- 2.1 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 or if our processing reveals your behaviour to be consistent with that of known fraudsters or money launderers; 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:
by post: **Unit 3 Brooklands, Moons Moat Drive, Redditch, B98 9DW**
by email: complaints@automoneytrust.co.uk

3. Consequences of Processing

- 3.1 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.
- 3.2 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:
by post: **Unit 3 Brooklands, Moons Moat Drive, Redditch, B98 9DW**
by email: complaints@automoneytrust.co.uk

4. Data Transfers

- 4.1 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.

5. Your Rights

5.1 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.

5.2 For more information or to exercise your data protection rights, please contact us:

by post: **Unit 3 Brooklands, Moons Moat Drive, Redditch, B98 9DW**

by email: complaints@automoneytrust.co.uk

5.3 You also have a right to complain to the Information Commissioner's Office which regulates the processing of personal data.

Schedule C: Fair Processing Notice for the Purposes of Employment Validation

- 1.1 You expressly authorise us to conduct a search for, and if available, obtain details of your employment with those employers named in your application for finance us, including your salary, job title, length of service and place of work (“**Employment Data**”), which shall be used to assess your eligibility for finance with us.
- 1.2 A search of your Employment Data will be conducted via our partner Equifax Limited, in accordance with its [Privacy Policy](#), and a request will be sent to His Majesty’s Revenue and Customs (“**HMRC**”), and you will be directed to a web address (or notified of the same) asking you to provide your HMRC authentication details and enable disclosure of your Employment Data.
- 1.3 We will not have sight of, or access to, any of your HMRC authentication information.
- 1.4 You always have the option not to give your authorisation, but please be aware that without it, we may not be able to provide certain products or services to you, or alternative verification your Employment Data may be required, which may cause some delay.