

Privacy and You

Who We Are

Peeled Finance is licenced by the Competition and Consumer Protection Commission to act as a credit intermediary under the terms of the Consumer Credit Act, 1995. Peeled Finance ('we' or 'us' or 'our') gather and process your personal data in accordance with this privacy notice and in compliance with relevant data protection law, including the EU General Data Protection Regulation ('GDPR') and implementing legislation such as the Data Protection Act 2018. This notice provides you with the necessary information regarding your rights and our obligations, and explains how, why and when we process your personal data. Peeled Finance's registered office is at Saint James House, Adelaide Rd, Dublin 2, Ireland and we are a company registered in Ireland under company number 614386. We act as a Credit Intermediary on behalf of motor finance providers.

Our Data Protection Officer can be contacted at Peeled Finance Limited, 1st Floor, Synergy Centre, IT Tallaght, Tallaght, Dublin 24, D24 A386 or by email to dataprotection@peeledfinance.com.

What & How?

Peeled Finance processes your personal information to meet our legal, statutory and contractual obligations and to provide you with our products and services, as described in further detail below in the 'Purposes of Processing and Legal Basis' section.

The personal data that we collect includes:

Name	Date of Birth
Home Address	Personal Email
Business Email	Home Telephone Number
Employment details	Telephone recordings
Mobile Telephone Number	Personal Public Services Number
Passport	Driver's Licence
Details of income	Bank details or other personal documents
Photograph	Security questions and/or user ID

In order to verify your identity, you will be asked to take a selfie as part of our identification process. We use facial recognition technology to authenticate and verify your image against your ID documents. This will involve the collection and processing of biometric data, which is a special category of personal data.

We collect information in the below ways:

- Where you supply information online through our website or online mobile applications;
- When you or others give us information verbally or in writing. This information may be on application forms, in

records of your transactions with us or if you make a complaint.

- From your online activities with third parties where you have given us your consent (for example, by consenting to our use of certain cookies or other location tracking technologies).
- From credit reference agencies like the Irish Credit Bureau (ICB). For further details on how the ICB will use your data, please review the ICBs Fair Processing Notice at <https://secure.icb.ie/pdf/FairProcessingNotice.pdf>
- Fraud prevention agencies or public agencies or authorities, the Companies Registration Office or judgement registries;
- Device data (such as type of device, operating system, IP-addresses and advertising ID's).

Purposes of Processing and Legal Basis

The purposes and reasons for processing your personal data are detailed below:

- to provide you with our services;
- to correspond with you;
- to complete identity and fraud prevention checks;
- to enable the completion of credit rating checks;
- to facilitate the communication between you and the motor finance provider;
- to comply with our legal obligations;
- to send you promotional and marketing materials, subject to any preferences that you express when we collect your contact details or subsequently. You can opt out of receiving promotional and marketing materials from us at any time by contacting us.

The legal bases on which we process your personal data are:

- that this is necessary for the performance of a contract between you and the motor finance provider or in order to take steps at your request prior to entering into the contract;
- that this is necessary for compliance with a legal obligation that applies to us, including for anti-money laundering, counter terrorist financing and fraud prevention;
- that this is necessary for the purposes of our legitimate interests in marketing and promoting our products and services, preventing identity fraud and conducting our business in a responsible and commercially prudent manner. We will not process your personal data for these purposes if such legitimate interests should be overridden by your own interests, rights and freedoms;

The legal basis on which we collect, process and transfer special categories of data relating to you in the manner described above are;

- that you have given your explicit consent to such processing.

Your Rights

At any point while we are in possession of or processing your personal data, you, as the data subject, have the below rights:

Right of access – you have the right to request a copy of the information that Peeled Finance processes about you, including; what data we hold, the purposes of the processing, type of data, who we disclose it to, how long we will store it and where we obtained it. You can request a copy from our Data Protection Officer by email.

Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete. You can ask us to correct and/or complete your personal data and we will strive to do so as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.

Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records. Any personal data related to financial transactions is excluded from this right as we have an obligation to retain this information for at least 5 years due to Irish anti-money laundering laws.

Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.

Right of portability – where our processing of your personal data is based on you having provided consent, or is necessary for the performance of a contract with you, you have the right to have the data we hold about you transferred to you or to another service provider in electronic form so that you can store and reuse your personal data for your own purposes across different services. We will not be in any way accountable or liable for any damage, loss or distress sustained, incurred or suffered by you and/or the designated service provider as a result of improper use of the personal data upon and after receipt from us.

Right to object – you have the right to object to certain types of processing such as direct marketing.

Right to object to automated processing, including profiling – You have the right to be informed about any automated decision-making that may be used and can appeal any decisions made where the decision has a significant legal effect on you. Our credit decisions process may include automated decision making.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure.

Sharing and Disclosing

Peeled Finance uses third-parties to provide services and business functions. We have taken appropriate measures to ensure that all processors acting on our behalf only process personal data in accordance with our instructions and comply fully with this privacy notice and relevant data protection law.

We may need to share your information with certain third parties in connection with the above purposes, including:

- Motor Finance Provider;
- Identity Verification Provider;
- Fraud Screening Solution Provider;
- Credit Reference Agencies;
- Payment Service Provider;
- Car Dealerships



- Where applicable, An Garda Síochána or other law enforcement authorities to comply with requests for information in relation to investigations; and
- any third parties whom you ask us to share your information with.

Transfers Outside the EU (if applicable)

Some of our service providers, including payment processors, identity verification solutions or suppliers may be based outside of the EEA, including in jurisdictions which are not recognized by the European Commission as providing for an equivalent level of protection for personal data as is provided for in the European Union. Where we authorise the processing or transfer of your personal data outside of the EEA, we will ensure that there are acceptable safeguards in place to comply with our obligations under applicable law governing such transfers.

These may include entering into a contract governing the transfer that contains the 'standard contractual clauses' approved for this purpose by the European Commission or, in respect of transfers to the United States of America, ensuring that the transfer is covered by the EU-US Privacy Shield framework.

If you would like to receive further details of the measures that we have taken in this regard, please contact our Data Protection Officer.

Implications of Not Providing Your Data

You are not under a statutory or contractual obligation to provide your personal data to Peeled Finance, however, as this information is required for our legal obligations, and to be able to enter into the agreement with you, we will not be able to offer our services without it.

How Long We Keep Your Data

Peeled Finance only ever retains personal data for as long as is necessary and we have strict review and retention policies in place to meet these obligations. We are required under EU and local Irish anti-money laundering laws to keep your personal data for a minimum of 5 years after the business relationship ends, after which time it will be destroyed. Where you have consented to us using your details for direct marketing, we will keep such data until you notify us otherwise and/or withdraw your consent.

Lodging A Data Complaint

Peeled Finance only processes your personal data in compliance with this privacy notice and in accordance with the relevant data protection law. However, if you wish to raise a complaint regarding the processing of your personal data or if you have any questions about how your personal data is gathered, stored, shared or used, or to exercise any of your data rights, please contact our Data Protection Officer above.

If you are unsatisfied with how we have handled your information, you have the right to lodge a complaint with the supervisory authority.

Data Protection Commission, Canal House, Station Road, Portarlinton, Co. Laois, R32 AP23, Ireland.

Phone +353 (0761) 104 800 | LoCall 1890 25 22 31 email info@dataprotection.ie or go to

<https://dataprotection.ie/docs/Raise-a-Concern/1716.htm>