



# RBA Network Limited

## Privacy Policy

We are committed to protecting and respecting your privacy. This privacy notice explains when and why we collect personal information, how we use it, the conditions under which we share it with other people and how we keep it secure.

**This privacy notice applies to visitors to our website, including individuals who have logged into our website and created accounts to quote or order products and services from us, or organisations utilising our site to manage their schemes, or who have contacted us by telephone, e-mail or other electronic means.**

### 1 Who we are

We are RBA Network Limited, a company registered in England & Wales 06926241 whose registered office is at 1<sup>st</sup> Floor, Unit 5, Arabesque House, Monks Cross Drive, Monks Cross, York, YO32 9GZ .

We are a **data controller** for the purposes of the Data Protection Act 1998 (**DPA**) and the General Data Protection Regulation 2016 (**GDPR**).

We are authorised and regulated by the Financial Conduct Authority (FCA) under registration number 660140.

### 2 How to contact us

If you have any questions about this privacy notice or our data protection policies generally, please contact us:

*By post:* Helen Rains, Compliance Officer, RBA Network Limited, 1<sup>st</sup> Floor, Unit 5, Arabesque House, Monks Cross Drive, Monks Cross, York, YO32 9GZ

*By email:* helen@rbass.eu

*By phone:* 01904 623 202

### 3 Visitors to the website

#### 3.1 What information do we collect and process?

When you visit our website we use third party services to automatically collect information about your computer, including your IP address, information about your visit, your browsing history, and how you use our website.

We use cookies within our website. You can read more about how we use cookies in our separate [Cookies Policy](#).



If you contact us via our website, please see the ["People who contact us"] section below.

### 3.2 **How is your information used?**

We use your information collected automatically from our website to improve the customer experience and functionality of our website. We may also use this information to send you communications of products or services that may be of interest to you.

### 3.3 **Who has access to your information?**

Our Marketing team has access to analytic platforms and tools that collect and process website visitor information.

### 3.4 **Lawful processing**

When we process your personal data for the purposes of improving our website, we do so on the basis of our legitimate interests in maintaining a relevant and functioning website and improving customer experience.

We only use personal data obtained from the website to contact you if we feel there is a legitimate reason to inform you of the products and services we offer.

### 3.5 **How long do we retain your data?**

We retain personal data collected automatically from our website for as long as it is valid, accurate and up to date or until such time that you choose to unsubscribe.

## 4 **Users**

Users are any individuals who have logged into our website and created accounts to quote or order products and services from us. This includes organisations utilising our site to manage their schemes.

### 4.1 **What information do we collect and process?**

We receive information from you when you register with us, search our website for a vehicle, request a quote for a vehicle, order a vehicle from our site or communicate with us by phone, e-mail, live-chat or otherwise.

The personal data you provide may include your name, postal address, e-mail address, phone number, date of birth, salary, username & password, IP Address, title & marital status, NI Number, Driver Licence number, Vehicle details, Payroll / Employee ID, digital signature (via DocuSign), financial and payment information, employment history, credit history, identification records and other information about yourself. This information is required to enable us to provide you with a vehicle or other related services and without



this information we may not be able to offer you some of our products and services.

You may also provide contact details and other personal data when you voluntarily participate in a competition, special offer, promotion or survey or where you provide feedback on our products and services. You are not required to provide any such information in these circumstances and this will not affect any of our services which we may provide to you.

We also collect information from other sources:

- Financial/ Credit Information – We will use information provided by credit reference agencies when assessing your application for finance and to verify your or, if applicable, your representative's identity. Such information may include some details about other credit you have taken out, any credit arrangements you have met or failed to meet, and any county court judgments made against you.
- Fraud Prevention Agencies – When verifying your identity as part of your application process, we may access information recorded by fraud prevention agencies within and outside the UK. This may include information about any criminal convictions and any allegations regarding criminal activity that relate to you.
- Driving Licence Checks – we use information provided by Driving Licence agencies when assessing your application. Information may include details of any points on your licence.

#### 4.2 **How is your information used?**

We will use your information to manage your account with us, process any requests for quotes or any orders that you have submitted and carry out our obligations arising from any orders that you have entered into.

We may use automated decision making in regard to your personal data for elements of our services and products, for example to generate a list of vehicles for you, undertake driving licence checks and to generate quotes for vehicle insurance.

#### **Credit Scoring & Crime Prevention**

We use a selection of different funders to provide credit/finance for vehicles. During the ordering process your personal information will be passed to a carefully selected funder so that an evaluation of affordability and an assessment of suitability for credit can be carried out.

We only allow funders access to the minimum amount of personal information they need to perform a credit search and to provide finance to you. This includes your name, address, phone numbers and email addresses, date of birth, marital status, postal address, driving licence number, bank account information, employment history and salary.



Your information will be used;

- for making a credit check on you. Funders may carry out a search with a credit reference agency who will keep a record of their enquiry against your name and which may be linked to your representatives (“associated records”). For the purposes of any application for products or services from us, you may be assessed with reference to “associated records”. Where any search or application is completed or agreement entered into involving joint parties, Funders may record details at credit reference agencies, as a result an “association” will be created that will link your financial records. Details of which credit reference agency funders have used are available on request from RBA Network Limited. Funders may also add to your or, if applicable, your business’s, record with the credit reference agencies details of your agreement with them, any payments you make under it and any default or failure to keep to its terms. These records will remain on the credit reference agencies’ files for 6 years after our agreement with you is settled or terminated whether settled by you or, if applicable, your business or by way of default. These credit reference agencies may create, or add to, their own record about you, or, if applicable, your business, details of our search and your application. This and other information about you or, if applicable, your business and those with whom you are linked financially may be used to make credit decisions about you or your business;
- Funders may use credit scoring techniques and automated decision making systems to either fully or partially assess your information. These credit scoring techniques and automated decision making systems may take into account any previous applications for finance, defaults or existing debt. The results of this decision may decide whether we provide you with our services or not. If you disagree with the results of an automated decision, you can request a review of your application;
- to allow funders to detect and prevent fraudulent activity including sharing personal data with fraud prevention agencies;
- to allow funders to detect and prevent money laundering or terrorist financing activity; and
- to manage and administer monthly payments under any agreement made with you, including recovery of any outstanding debt.

You can send us a request to review the accuracy of a decision that you are unhappy with by contacting us by email: [jill@rbass.eu](mailto:jill@rbass.eu) or by telephone: 01904 623 202

Where you participate in a competition or complete a survey, we will only use your information for the purposes notified to you in connection with such competition or survey.



Where you provide feedback (whether by phone, e-mail, LiveChat or otherwise), we may use such information to improve our services to you.

Our website may contain links to other third party websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not part of this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

#### 4.3 **Who has access to your information?**

Our staff have access to your personal data to support and provide guidance on our products and services and to carry out our obligations arising from any orders that you have entered into.

We share your personal information with one of a carefully selected panel of funders for them to carry out affordability and credit checking, and to provide finance for products.

We may also share your information with other third party service providers, also known as Data Processors, to complete tasks and provide services to you on our behalf. However, when we use third party service providers, we only share the personal information that is necessary to deliver a service and our contract requires them to keep your information secure and not to use it for their own purposes, for example they will not use it for direct marketing purposes. Please be reassured that we will not release your information to third parties for them to use for their own purposes, unless you have requested us to do so, or we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime.

Examples of services where we may use third party service providers include:

- driving licence checks
- vehicle ordering, delivery and collection systems and services
- DVLA
- vehicle dealerships
- vehicle insurance
- service bookings and garages
- breakdown and accident assistance
- tyres and windscreens
- fines management
- customer surveys and feedback
- direct debit and payment handling
- daily rental providers
- digital signature services



#### 4.4 **Lawful processing**

When we process your personal data for the purposes of processing quotes or orders, including rectifying your data to ensure its accuracy, we do so on the basis of performance of a contract with you or taking steps with the intention of entering into a contract with you for our services.

#### 4.5 **How long do we retain your data?**

We retain your personal data until seven years after expiry of all contracts for services with you (via your employer), which is required for the purpose of auditing and complaints.

### 5 **People who contact us by phone, e-mail, LiveChat or other means**

#### 5.1 **What information do we collect and process?**

*Telephone* - When you call us, we may collect your telephone number. All telephone calls are recorded.

*E-mail* - We will collect your name, e-mail address and the contents of your message and any attachments.

*LiveChat* - We will collect your name, email address and a transcript of the LiveChat conversation.

*Other social media* - If you contact us via Facebook, LinkedIn or other social media, we will collect your name and/or online avatar and any other personal information that you make available to us on these platforms.

#### 5.2 **How is your information used?**

We may use any information obtained by phone, e-mail, LiveChat or other social media to:

- Help identify RBA Network Limited staff training needs and improve staff performance;
- Establish the facts in the event of a complaint either by a customer or a member of staff and so assist in resolving it;
- Assist in quality control to identify any issues in processes;
- Customer assurance / security

#### 5.3 **Who has access to your information?**

Our staff have access to any personal data collected by phone, e-mail and LiveChat, via our in-house customer management systems, so they can provide support and guidance and respond to customer queries.



#### 5.4 **Lawful processing**

When we process your personal data in connection with telephone calls, LiveChat sessions, e-mails or social media, we do so on the basis of:

- where relevant, communications in connection with the performance of a contract with you (via your employer); or
- our legitimate interests to discuss our products and services with you, in creating and retaining records of such communications for training purposes and for evidentiary purposes or to respond to customer queries.

#### 5.5 **How long do we retain your data?**

Where a communication is relevant in connection with a contract or proposed contract relating to you (via your employer), we retain any related personal data in accordance with the retention periods set out in paragraph 4.5 above.

In all other circumstances, we retain recordings, transcripts, e-mails and other copies of communications for a maximum period of 7 years

### 6 **Marketing**

We would like to send you information about products and services we offer which may be of interest to you, as well as other information which may be relevant to you such as special offers or promotions.

#### 6.1 **Marketing communications**

If you have provided us with business contact details, we will send you marketing information by post, telephone, e-mail, text or other electronic instant messages where it is in our legitimate interests in pursuing sales leads to do so (provided that you have not opted out of such communications and provided that it constitutes fair processing of your personal data to do so).

If you have provided us with personal contact details, we will only send you marketing e-mails or texts or other electronic instant messages where you have specifically consented to receive such communications. We may provide you with marketing information by post or by telephone where it is in our legitimate interests in pursuing sales leads to do so (provided that you have not opted out of such communications and provided that it constitutes fair processing of your personal data to do so).

#### 6.2 **Marketing preferences**

You can also opt out of any marketing communications by:

- clicking on the "unsubscribe" links in any marketing e-mails;



- emailing us at helen@rbass.eu
- calling us on 01904 623 202 or
- if you have signed up to receiving marketing from us by text, replying STOP to the last message you received from us.

### 6.3 **Who has access to your information?**

Our marketing staff have access to any personal data obtained for marketing purposes. We will not sell or rent your information to third parties. We will not share your information with third parties for marketing purposes.

We may also use the services of third party marketing companies and platforms, including;

- Customer surveys and feedback
- Product and service reviews
- Analytics platforms
- SMS services
- Emailing services
- Marketing printing and postal services

### 6.4 **Lawful processing**

When we process your business contact data for marketing purposes, we do so on the basis of our legitimate interests in pursuing sales leads to inform you of the services and products we offer.

When we process your personal contact data for marketing purposes, we do so on the basis of your consent or in limited circumstances on the basis of our legitimate interests in pursuing sales leads.

### 6.5 **How long do we retain your data?**

7 years

## 7 **Retention of data generally**

We retain personal data for as long as necessary to provide the products and services you have requested, or for other essential purposes such as complying with our legal obligations, resolving disputes and enforcing our agreements. Because these needs can vary for different data types in the context of different products, actual retention periods can vary significantly. We therefore categorise data and review the retention periods for each set of data. This ensures that we never hold any personal information for longer than is required to provide our products and services to you, or for longer than we are legally bound to or otherwise have a legitimate interest to. We review our retention periods on a regular basis to ensure they are up to date.





## 8 **How you can access and update your information**

The accuracy of your information is important to us.

You can contact us requesting an update to your information by email: [helen@rbass.eu](mailto:helen@rbass.eu) or by telephone: 01904 623 202

You also have the right to ask for a copy of the personal information and data we hold about you. All requests must be in writing, and it would be helpful if any such request also indicates what information you are seeking and between any particular dates. All requests for access to personal data should either be sent by email to: [helen@rbass.eu](mailto:helen@rbass.eu) or by post to: Data Protection Officer, RBA Network Limited, 1<sup>st</sup> Floor, Unit 5, Arabesque House, Monks Cross Drive, Monks Cross, York, YO32 9GZ

## 9 **How secure is your information?**

The secure protection of your information is extremely important to us, and we have implemented advanced controls and measures to remove risks to your information and protect against loss, misuse, or unauthorised access. Any personal information is protected with 256 AES-Bit encryption. When you are on a secure page, a padlock icon will appear near the URL, showing that your connection with the RBA Network website is secure and encrypted.

RBA Network is certified to ISO9001:2015, which demonstrates we have an industry gold-standard process management system, which has been put in place to help safe guard and protect your information.

## 10 **Data transfers**

We do not transfer any personal data outside of the European Economic Area (EEA).

## 11 **Data protection complaints**

All complaints regarding our handling of personal information will be logged and actioned by us and treated seriously. Any complaints of this nature should be made to the Data Protection Officer at [helen@rbass.eu](mailto:helen@rbass.eu) or in writing to Data Protection Officer, RBA Network Limited, 1<sup>st</sup> Floor, Unit 5, Arabesque House, Monks Cross Drive, Monks Cross, York, YO32 9GZ

You also have the right to lodge a complaint with a supervisory authority, which is the [Information Commissioner's Office \(ICO\)](#) for the UK.

## 12 **Your rights**

Your personal data is protected by legal rights, which include your rights to:

12.1 object to our processing of your personal data;



- 12.2 request that your personal data is erased or corrected;
- 12.3 request that any automatic decision-making or profiling is reviewed;
- 12.4 request access to your personal data; or
- 12.5 complain to the Information Commissioner's Office, which regulates the processing of personal data, about how we are processing your personal data.

If you want to exercise any of these rights, please contact us using the details above.