

T. C. Harrison 1960 Limited (“**TCH**”) is committed to protecting your personal information and complying with all applicable legislation in relation to data protection. This policy describes how we collect, use and disclose your personal information.

This policy applies to any personal information about you that you provide to TCH or which is provided to TCH by third parties.

The data controller in respect of personal information processed under this policy is T.C. Harrison 1960 Limited (a company incorporated in England with company number 0648847) whose registered office is at Milford House, Mill Street, Bakewell, Derbyshire, DE45 1HH. TCH is authorised and regulated by the Financial Conduct Authority (Firm reference number: 664529).

TCH trading names include TCH Leasing, TCH Salsa, TCH Concerto, icarlease, ivanlease and Milford Leasing. TCH is a wholly owned subsidiary of T. C. Harrison Group Limited (a company incorporated in England with company number 1863311) whose trading names include TC Harrison Ford and T C Harrison JCB.

We have a Compliance Officer who you can contact on 01629 816000 or via email datacompliance@tchgroup.co.uk should you have any comments or queries in relation to this policy or TCH’s use of your personal information.

WHY DO WE COLLECT PERSONAL INFORMATION ABOUT YOU?

TCH collects personal information about you to provide you with our products and services and to improve and develop these for the future.

WHAT PERSONAL INFORMATION DO WE COLLECT?

TCH may collect the following types of personal information from you:

- Name
- Date of Birth
- Address and address history
- Nationality
- Contact details such as email address and telephone numbers
- Financial information and credit history
- Employment details
- Driving licence and insurance information including data on driving offences or convictions
- Identifiers assigned to your computer or other internet connected device including your Internet Protocol (IP) address
- Vehicle and/or machine registration and identification numbers
- Telematics information about the location of your vehicle and/or machine
- Details about any vulnerabilities you may have in accessing our products, this may involve acquiring a limited amount of health data in order that we may treat you fairly (this data will be deleted as soon as it ceases to be necessary)

It is important that you notify us of any change to your data so that the information we hold about you is kept accurate and up to date.

In addition to the above if you are a director of a corporate entity we may send your data and contact details to our funders so that they may perform money laundering and credit checks as necessary.

HOW DO WE RECEIVE PERSONAL INFORMATION ABOUT YOU?

TCH receives personal information about you:

- When you contact us directly, visit our websites, driver portals or use our social media channels, whether to apply for one of our products or services or to make an enquiry or other request.
- From your employer if TCH have been contracted to provide services for them
- From our other group companies and our carefully selected business partners who provide products and services, such as introducing brokers, fraud prevention or credit reference agencies or trade bodies.

HOW DO WE USE PERSONAL INFORMATION ABOUT YOU?

TCH and its group may use your personal information for the following purposes:

- To verify your identity and to identify you when you contact us.
- As a precursor to entering into or fulfilling a contractual obligation.
- To make decisions on credit, insurance and other facilities, about you, your financial associate(s), members of your household or your business.
- To help to prevent fraud and money laundering.
- To help administer, and contact you about improved administration of, any accounts, services and products we have provided before, or provide now or in the future.
- Recover debts that you owe and trace your whereabouts.
- To carry out marketing analysis and customer profiling (including with transactional information), conduct research, including creating statistical information using data provided by you.
- To carry out statistical analysis to help with decisions about account management.
- To contact you for marketing purposes relating to products and services that we think will be of potential interest to you.
- To fulfil a contractual obligation with your employer.

Any personal data provided to third parties for the purpose of financing will be processed in accordance with their Privacy Policy. Please refer to the Privacy Policy of the financial organisation for details on how your personal data is processed.

If we process personal data to fulfil a contractual obligation with your employer you should refer to your employer's Privacy Policy for further details as to how your personal data is processed.

THE LAWFUL GROUNDS THAT WILL BE RELIED UPON WHEN YOUR PERSONAL INFORMATION IS USED

There are different lawful grounds that we rely on to use your personal information and we will collect and use your personal information in the following situations:

- where our use of your personal information is **necessary to perform a contract or contracts that you are a party to, or to take steps that you request before entering into a contract**. These contracts could include the conditions on which you enter a competition or agreements you enter into for service products, for example;
- where our use of your personal information is **within our legitimate interests or the legitimate interests of the organisation with which we have shared your personal information** and we have made sure that your personal information, and your rights in relation to that information, are

protected. For example, we may rely on this legal ground if we use your personal information to: understand and improve our products, services and/or business or marketing strategies; for research purposes; to manage and improve our relationship with you and for administrative purposes; to help find out what information, products and services are most likely to interest you and to send or show you information, offers, and online advertisements for these products or services; to personalise your experience of our products and services; to ensure that our products and services are delivered and used in accordance with the law and the terms and conditions that apply to them; and where necessary to protect or defend our or another's rights or property, or to detect, prevent, or otherwise address fraud, security, safety or privacy issues;

- Where your information is provided to us to fulfil a contractual obligation with your employer we will rely on **legitimate interests** such as ordering or arranging delivery of a vehicle, to register you as a driver or arrange a demonstrator or hire vehicle, to arrange vehicle repair, servicing, MOT or tyre replacement or breakdown; to deal with parking or speeding fines; to administer vehicle accident claims, to deal with services such as TCH Salsa; to enable your employer to manage their grey fleet
- where we believe it is necessary to use your personal information to **comply with a legal or regulatory obligation**;
- in limited circumstances where we believe it is necessary to protect someone's safety or **vital interests**;
- in certain circumstances, we may need to use your personal information for purposes which are in the **public interest**; and
- where we have your **consent**. We will rely on your consent to, for example, to use your personal information for marketing to you by email and text message. Where we rely on consent to use your personal information, you have the right to withdraw that consent at any time. Please see the '**Your rights**' section of this notice for more details.

WHO DO WE PROVIDE THIS PERSONAL INFORMATION TO?

TCH will provide your personal information to:

- Financial services providers
Your personal data may be shared with financial services organisations, such as companies which provide hire-purchase funding and banks providing such funding. This is for the purpose of securing such funding on your behalf. We may provide personal data to enable such financial services organisations to carry out necessary searches in order to enable them to make a funding decision for you and meeting their legal and regulatory requirements.
In addition, these funders may share your data within their group of companies who provide services to them and so that they and any other companies in their group can look after your relationship with us and them.
- Marketing providers.
- Third party debt collection agencies, insolvency practitioners and legal advisors.
- Our service providers who perform services on our behalf, such as banking services and data management firms.
- Third party dealers and repairing garages
- Your employer, if we are fulfilling a contractual obligation with your employer

WHERE WE STORE YOUR INFORMATION

All personal information we have about you is stored on secure servers operated by TCH or its third party service providers.

HOW LONG WILL WE KEEP PERSONAL INFORMATION ABOUT YOU?

TCH will retain your personal information only as long as is necessary to fulfil the purposes for which it was obtained.

We may keep your data for longer periods if we cannot delete it for legal, regulatory or technical reasons. Maintaining your personal information for these periods allows us to keep accurate records for our legal obligations and to handle any future complaints.

DATA TRANSFERS

Whenever TCH transfer your data outside the European Economic Area (EEA) we impose contractual obligations on the recipients of that information to protect it to the standard required in the EEA.

COOKIES

For detailed information on the cookies we use and the purposes for which we use them see the TCH Cookie Policy on our website.

YOUR RIGHTS

You have the following rights in connection with your personal information processed by TCH:

- **ACCESS** – you can request access to your personal information and further details about how your personal information is handled by TCH.
- **OBJECT** – you have the right to object to our processing of your personal information for direct marketing purposes.
- **RECTIFICATION** – you can request rectification of any incorrect personal data held about you.
- **ERASURE** – you can request erasure of any personal data where the processing is based on explicit consent.

You have a right at any time to opt-out or withdraw consent of receiving marketing from us and/or to amend the delivery method we use. We will only use your personal information to send you marketing messages if we have either your consent or a 'legitimate interest'. That is when we have a business or commercial reason to use your information. It must not unfairly go against what is right and best for you.

To manage your rights and delivery preferences please follow the instructions in our marketing communications, enquiry forms or write to us at:

Post: Marketing Department, T.C. Harrison 1960 Limited, Cuthbert House, 9 Brookdale Court, Chapeltown, S35 2PT Email: marketing@tchleasing.co.uk

You can also opt-out from us passing your information to the other businesses listed above.

You can exercise any of these rights at any time by contacting us contacting our Compliance Officer using the contact details provided above.

If you are concerned or have questions about how TCH handles your personal data please contact us and we will do our best to assist you. Please note that you have the right to lodge a complaint with the UK Information Commissioner's Office (or any other appropriate supervisory authority), which may be accessed through the following link <https://ico.org.uk/concerns/>.

OTHER IMPORTANT TERMS

If a court finds part of this Privacy Policy illegal or invalid, the rest will continue in force. Each of the Conditions, and each paragraph of each Condition, operates separately. If any court or relevant authority decides that any of them are unlawful, the remaining parts will remain in full force and effect.

If we do not insist immediately that you do anything you are required to do under this Privacy Policy, or if we delay in taking steps against you in respect of your breaching this Privacy Policy, that will not mean that you do not have to do those things and it will not prevent us from taking action against you at a later date.

GOVERNING LAW AND JURISDICTION

This Privacy Policy and any dispute or claim arising out of or in connection with it or its subject matter will be governed by and construed in accordance with the laws of England and Wales.

The parties irrevocably agree that the courts of England will have exclusive jurisdiction to settle any dispute or claim that arises out of or in connection with this Privacy Policy or its subject matter.

CHANGES TO OUR PRIVACY POLICY

TCH reserve the right to revise this privacy policy or any part of it from time to time. Please check back frequently to see any updates or changes to our privacy policy.