

## BACKGROUND:

Payment Assist Ltd understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our customers and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

### 1. **Information About Us** Payment Assist Ltd.

Limited company registered in England under company number 08752986.

Registered address: Pera Business Park, Nottingham Road, Melton Mowbray, Le13 0PB

Data Protection Officer: Ametros Group Ltd.

Email address: [compliance@payment-assist.co.uk](mailto:compliance@payment-assist.co.uk).

Telephone number: 01664503151.

Postal address: Pera Business Park, Nottingham Road, Melton Mowbray, Le13 0PB

We are regulated by The Financial Conduct Authority

We are registered with the Information Commissioners Office

### 2. **What Does This Notice Cover?**

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data and the choices you have associated with that data.

### 3. **What Is Personal Data?**

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) and the Data Protection Act 2018 (collectively, “the Data Protection Legislation”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

### 4. **What Are My Rights?**

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can

always contact us to find out more or to ask any questions using the details in Part 17.

- b) The right to access the personal data we hold about you. Part 10 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 17 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 11 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. Part 6 explains more about how we use your personal data, including automated decisionmaking.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 17.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. we would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in Part 17.

## 5. What Personal Data Do You Collect and How?

Depending upon your use of Our Site, we may collect and hold some or all of the personal [and non-personal] data set out in the table below, using the methods also set out in the table. We do not collect any 'special category' or 'sensitive' personal data or personal data relating to children.

| Data Collected | How we Collect the Data    |
|----------------|----------------------------|
| Name           | As part of the application |

|                             |                            |
|-----------------------------|----------------------------|
| <b>Address</b>              | As part of the application |
| <b>Post Code</b>            | As part of the application |
| <b>Telephone number</b>     | As part of the application |
| <b>Email address</b>        | As part of the application |
| <b>Date of Birth</b>        | As part of the application |
| <b>Vehicle Registration</b> | As part of the application |

## 6. How Do You Use My Personal Data?

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. The following table describes how we may use your personal data, and our lawful bases for doing so:

| <b>What we Do</b>                   | <b>What Data we Use</b> | <b>Our Lawful Basis</b>                                       |
|-------------------------------------|-------------------------|---|
| Administering our business.         | All data                | To manage account and respond to queries and requests.        |
| Supplying our services to you.      | All data                | To evaluate acceptability for a facility                      |
| Managing payments for our services. | All data                | Collection of repayments of facility                          |
| Communicating with you.             | All data                | Making contact with you about the repayments of your facility |

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email, telephone text message or post with information, news, and offers on our products and services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out. We will always obtain your express opt-in consent before sharing your personal data with third parties for marketing purposes and you will be able to opt-out at any time.

We use the following automated systems for carrying out certain kinds of decisionmaking. If at any point you wish to query any action that we take on the basis of this or wish to request 'human intervention' (i.e. have someone review the action themselves, rather than relying only on the automated method), the Data Protection Legislation gives you the right to do so. Please contact us to find out more using the details in Part 17.

- The following automated decision-making method(s) may be used:
  - Payment Assist in house customer onboarding process
  - Credit checks via Creditsafe.

we will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 17.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

As part of the processing of your personal data, decisions may be made by automated means. This means we may automatically decide that you pose a fraud or money laundering risk if our processing reveals your behaviour to be consistent with money laundering or known fraudulent conduct, or is inconsistent with your previous submissions, or you appear to have deliberately hidden your true identity. You have rights in relation to the automated decision making if you want to know more, please contact us using details located in Part 17.

## 7. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

| Type of Data   | How Long we Keep It |
|--|---------------------|
| Identity Information including name and date of birth                      | Six years.          |
| Contact information including address, telephone number and email address. | Six years.          |
| Payment information including tokenised details                            | Six years.          |

## 8. How and Where Do You Store or Transfer My Personal Data?

We will only store or transfer your personal data within the UK and jurisdictions where we have taken necessary steps to ensure that an equal level of protection is maintained in line with the Data Protection Legislation.

## 9. **Do You Share My Personal Data?**

We will not share any of your personal data with any third parties for any purposes, subject to the following exceptions.

As part of the application process, with Barclaycard (or any other merchant service provider we may use) for payment processing, with Creditsafe (or any other credit referencing company we may use) for the purpose of carrying out credit checks and with software providers for the delivery of messages via email or text.

If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

## 10. **How Can I Access My Personal Data?**

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 17.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

## 11. **Data**

### **Location Data -**

We may use and store information about your location if you give us permission to do so (“Location Data”). We use this Data to provide features of our service, to improve and customise our service.

You can enable or disable location services when you use our Service at any time by way of your device settings.

### **Tracking & Cookies Data -**

We use cookies and similar tracking technologies to track the activity on our Service and we hold certain information.

Cookies are files with a small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Other tracking technologies are also used such as beacons, tags, scripts to

collect and track information and to improve and analyse our service.

You can configure your browser to deny all cookies or to indicate when a cookie is being used. However, if you do not accept cookies, you may not be able to use some portions of our service.

**Examples of Cookies we use:**

- Session Cookies. We use Session Cookies to operate our Service.
- Preference Cookies. We use Preference Cookies to remember your preferences and various settings.
- Security Cookies. We use Security Cookies for security purposes.

**12. Security of Data**

The security of your data is important to us but remember that no method of transmission over the Internet or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

**13. Analytics**

We may use third-party Service Providers to monitor and analyse the use of our Service.

**- Google Analytics**

Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our service. This data is shared with other Google services. Google may use the collected data to contextualise and personalise the ads of its own advertising network.

You can opt-out of having made your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScripts (ga.js, analytics.js and dc.js) from sharing information with Google Analytics about visits activity.

For more information on privacy practices of Google, please visit the Google Privacy & Terms web page : <https://policies.google.com/privacy?hl=en>

**14. Behavioural Remarketing**

Payment Assist LTD uses remarketing services to advertise on third party websites to you after you visit our Service. We and our third-party vendors use cookies to inform, optimise and serve ads based on your past visits to our service.

**- Google Ads (AdWords)**

Google Ads (AdWords) remarking is provided by Google Inc.

You can opt-out of Google Analytics for Display Advertising and customise the Google Display Network ads by visiting the Google Ads Settings page:  
<http://www.google.com/settings/ads>

Google also recommends installing the Google Analytics Opt-out Browser Add-on - <https://tools.google.com/dlpage/gaoptout> - for your web browser. Google Analytics Opt-out Browser Add-on Provides visitors with the ability to prevent their data from being collected and used by Google Analytics

For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy?hl=en>

#### **- Twitter**

Twitter remarketing service is provided by Twitter Inc.

You can opt-out from Twitter's interest-based ads by following their instructions: <https://support.twitter.com/articles/20170405>

You can learn more about the privacy and policies of Twitter by visiting their Privacy Policy page: <https://twitter.com/privacy>

#### **- Facebook**

Facebook remarketing service is provided by Facebook Inc.

You can learn more about interest-based advertising from Facebook by visiting this page: <https://www.facebook.com/help/164968693837950>

To opt-out from Facebook's interest based ads, follow these instructions from Facebook : <https://www.facebook.com/help/568137493302217>

Facebook adheres to the Self – Regulatory for Online Behavioural Advertising established by the Digital Advertising Alliance. You can also opt-out from Facebook and other participating companies through the Digital Advertising Alliance in the USA, the Digital Advertising Alliance of Canada, or the European Interactive Digital Advertising Alliance in Europe, or opt-out using your mobile device.

<http://www.aboutads.info/choices/>

<http://youradchoices.ca/>

<http://www.youronlinechoices.eu/>

For more information on the privacy practices of Facebook please visit Facebook's Data Policy: <https://www.facebook.com/privacy/explanation>

#### **- AdRoll**

AdRoll Remarketing service is provided by Semantic Sugar, Inc.

You can opt-out of AdRoll by visiting this AdRoll Advertising Preferences web page: [http://info.evidon.com/pub\\_info/573?v=1&nt=1&nw=false](http://info.evidon.com/pub_info/573?v=1&nt=1&nw=false)

For more information on the privacy practices of AdRoll, please visit the AdRoll Privacy Policy web page: <http://www.adroll.com/about/privacy>

## 15. **Payments**

We may provide paid products and/or services within the Service. In that case, we use third-party services for payment processing (e.g. payment processors)

We will not store or collect your payment card details. That information is provided directly to our third-party payment processors whose use of your personal information is governed by their Privacy Policy. These payment processors adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, Mastercard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of payment information.

The payment processors we work with are:

### - **Barclaycard**

Their Privacy Policy can be viewed at

<https://www.barclaycard.co.uk/personal/privacy-policy>

### - **Links to other Sites**

Our Service may contain links to other sites that are not operated by us. If you click a third-party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

## 16. **Children's Privacy**

Our Service does not address anyone under the age of 18 ("Children")

We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your Child has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our services.

## 17. **How Do I Contact You?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

Email address: [admin@payment-assist.co.uk](mailto:admin@payment-assist.co.uk).

Telephone number: 01664 503 151.

Postal Address: Payment Assist Ltd, Pera Business Park, Nottingham Road, Melton Mowbray, Leicestershire LE13 0PB.

We will always try to maintain the highest standards and encourage the confidence our customers have in us as an organisation. To achieve this, we request that any complaints be first brought to our attention so we can properly investigate matters.

If you would like to complain about Payment Assist to the Information Commissioners Office you can contact them by telephoning 0303 123 1113.

**18. Changes to this Privacy Notice**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available via <https://www.payment-assist.co.uk>. This Privacy Notice was last updated on 19/10/2021.