

## Anglo Scottish Asset Finance Ltd Privacy and Cookies Statement

In this Privacy Statement the terms 'we' and 'us' mean Anglo Scottish Asset Finance Ltd.

We are authorised and regulated by the Finance Conduct Authority (FCA) Reference number:

FRN 629574

We are registered in England and Wales, Company Number:

CRN: 06099866

We are registered with the UK Information Commissioner's Office (ICO) under registration numbers:

Z1154075

Your privacy is important to us, and we are committed to keeping your information secure and managing it in accordance with our legal responsibilities under applicable data protection laws.

This Privacy and Cookies Statement, sets out the basis upon which: we will process personal information that:

- is collected from you when you apply for and/or express an interest in a product or service;
- we obtain during the provision of that product or service;
- is provided to us through [www.angloscottishfinance.co.uk](http://www.angloscottishfinance.co.uk) ("Website"), our mobile application, over the phone or through social media.

Please read this Privacy Statement carefully as it contains important information to help you understand our practices regarding any personal information that you give to us.

By accessing, browsing or otherwise using the Website or mobile application you confirm that you have read and agree to this Privacy Statement. If you do not agree with any part of this Privacy Statement, you should not use the Website or mobile application. If you are applying for one of our products or services online or by phone and do not agree with any part of this Privacy Statement, you should not continue with your application.

### 1. General Intro

- 1.1. We are committed to ensuring that we manage your personal data professionally and in compliance with all applicable data protection laws. Part of this commitment is to ensure that there is transparency about how we process personal data. This policy includes an explanation of:
  - 1.2. what data we are processing;
  - 1.3. why we are processing it and what we do with it;
  - 1.4. whether we will share it with anyone else;
  - 1.5. whether we will transfer it outside of the United Kingdom;
  - 1.6. how we keep your data safe; and
  - 1.7. your rights.

### 2. About us



- 2.1. Our company name is Anglo Scottish Asset Finance Ltd and we are located at 12-14 Lumley Court, Drum Industrial Estate, Chester Le Street, DH2 1AN. In this policy we have referred to the Anglo Scottish Asset Finance Ltd as: we, us, our or the Company Number 06099866.
- 2.2. We also operate under the following trading names Anglo Scottish, Anglo Scottish Asset Finance, Anglo Scottish Commercial Finance, Anglo Scottish Motor Finance, Anglo Scottish Prestige Finance
- 2.3. For any queries concerning your data please contact the Data Protection Appointed Director at Corporate House, Jenna Way, Interchange Park, Newport Pagnell MK16 9QB or by email at GDPR@maxxiagroup.com or by telephone on 01908 210100
- 2.4. We are a Finance Broker

### 3. Your personal data

- 3.1. We process your personal data if we understand that you may be interested in purchasing our products or services. In this section 3 we provide more detailed information about how we will manage your personal data.

3.1.1. Where information fields are marked as mandatory on any application form that you complete, you will need to provide such information in order for us to continue with your application. Should you complete mandatory sections of the application form, but not complete the application, we may use the information provided to contact you to provide support with the application process.

3.1.2. If you have visited our website we may automatically collect some personal information including: details of your browser and operating system, the website from which you visit our website, the pages that you visit on our website, the date of your visit, and the Internet protocol (IP) address assigned to you by your internet service. We collect some of this information using cookies – please see Cookies in section 5 for further information. We may also collect any personal information which you allow to be shared that is part of your public profile on a third party social network.

3.1.3. Where you provide information to us on our Website, our mobile application, in writing, through social media, completed an online form via Google, or over the phone (including via call recording); If you register an interest in a job vacancy, or a product and/or service, If you request information or assistance from us; If you make a complaint; Information provided to us from third parties including lenders, credit reference agencies, tax authorities, fraud prevention agencies, market information sharing databases, motor dealers, brokers and introducers;

3.1.4. Some of our telephone calls are recorded for training purposes and may also be used to verify any comments that were made during any conversation.

3.1.5. If you use our web chat function, we will keep a record of our communications.

3.1.6. Sometimes you will have sent your information directly to us, but you may have provided your information to our supporting suppliers / dealers, Agents, Brokers and Introducer Appointed Representatives who, in turn, have provided the information to us.

### 3.2. How do we use your personal data and what is the applicable lawful basis?

3.2.1. Where you are an individual, sole trader or unlimited partnership and have consented, we:

3.2.2. may provide you with marketing information about our products and services or the products and services of our selected partners or for events;

3.2.3. we will use your interaction with our website and with our chat function to identify which products will be the most relevant to you and deliver targeted and relevant messages to you.

3.2.4. Where we are required to do so to perform our contract with you, we may process your information for providing a financial statement.

3.2.5. We may process your information to comply with legal obligations including assisting HMRC, the Police and the Driver and Vehicle Licensing Agency

3.2.6. We may process your information to allow us to pursue our legitimate interests including for:

3.2.7. analysing our performance to further improve our customer services;

3.2.8. market research, training and to administer our websites;

3.2.9. the prevention of fraud or other criminal acts;

3.2.10. undertaking credit checks for finance;

3.2.11. complying with requests from you including if you exercise any of your rights noted in this Privacy Policy;

3.2.12. the purpose of corporate restructure or reorganisation or sale of our business or assets;

3.2.13. enforcing our legal rights or to defend legal proceedings and for general administration purposes.

3.2.14. . (where you have contacted us on behalf of a business or organisation excluding sole traders or unlimited partnerships) providing you with marketing information about our products and services or the products and services of our selected partners or for events.

### **3.3. Marketing**

3.3.1. Where you tell us you are happy to receive information from us we may send you communications products that we perceive may be of interest to you (including in relation to products and/or services of our partners where we have your agreement).

3.3.2. Depending on the contact preferences you select, we will communicate with you by letter, telephone, SMS, email or other electronic means such as via social and digital media.

3.3.3. If, at any time, you prefer not to receive further communications from us in any or all forms (except in connection with information, products or services that you specifically request), you will have the ability to unsubscribe from such communications by means of a link provided in every e-mail that is sent to you by us or by contacting us (See section on Contact Us below).

### **3.4. Personal identifiers from your browsing activity**

3.4.1. We also use third party cookies to run Google Analytics Demographics and Interest Reporting. These cookies gather website visitor data (such as age, gender, and interests) to optimize website content and marketing if combined with other information we know about you from previous visits, the data possibly could be used to identify you personally, even if you are not signed into our website.

3.4.2. We use this information in aggregate to assess the popularity of the webpages on our website and how we perform in providing content to you.

### **3.5. Our use of re-marketing**

- 3.5.1. Re-marketing involves placing a cookie on your computer when you browse our website in order to be able to serve to you an advert for our products or services when you visit some other website.
    - 3.5.2. We may use a third party to provide us with re-marketing services from time to time. If so, then if you have consented to our use of cookies, you may see advertisements for our products and services on other websites.
  - 3.6. **Will we share your personal data with any third parties?**
    - 3.6.1. We may share your data with our third party partners and other companies within our group, these companies include: CLM Fleet Management PLC, Maxxia Limited, Maxxia Finance Limited, Maxxia (UK) Limited and other Finance Houses.
    - 3.6.2. We may disclose your information to our third-party service providers for the purposes of providing services to us or directly to you on our behalf e.g. advertising agencies or administrative service providers. When we use third party service providers, we only disclose to them any personal information that is necessary for them to provide their service and we have a contract in place that requires them to keep your information secure and not to use it other than in accordance with our specific instructions.
    - 3.6.3. If we sell all or part of our business to a third party, we may transfer your information to that party to ensure that it can continue to provide information that you have requested or for any of the other purposes that we have noted above.
    - 3.6.4. We may transfer your data to government or other official bodies for the purposes of complying with legal obligations, for enforcing our rights, or for the prevention or detection of a crime.
  - 3.7. **How long do we keep your data?**
    - 3.7.1. If you have expressed an interest in buying products from us or from our selected partners, we will retain your contact details and related information concerning your enquiry for 7 years from the date that we last had contact with you.
    - 3.7.2. If you have purchased products from us or from our selected partners, we will keep the data relating to that purchase (e.g. order forms and invoices and related correspondence) for term of the agreement plus 7 years from the date of the contract.
    - 3.7.3. Records of any discussions through our web chat facility will be kept for 3 months
    - 3.7.4. If you have requested that we do not send you marketing information we will always retain sufficient information to ensure that we remember to comply with your request.
    - 3.7.5. The periods stated in this section 3.5 may be extended if we are required by law to keep your data for a longer period.
4. **Transferring your data outside of the United Kingdom ('UK')**
  - 4.1. The information that you send to us may be transferred to countries outside of the UK. By way of example, this may happen where any of our group companies are incorporated in a country outside of the UK or if any of our servers or those of our third-party service providers are from time to time located in a country outside of the UK. These countries may not have similar data protection laws to the UK.
  - 4.2. If we transfer your information outside of the UK in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected. These measures include imposing contractual obligations on the recipient of your personal information or ensuring that the recipients are subscribed

to 'international frameworks' that aim to ensure adequate protection. Please contact us if you would like more information about the protections that we put in place.

- 4.3. If you use our services whilst you are outside the UK, your information may be transferred outside the UK to provide you with those services.

## 5. Cookies

- 5.1. We use Cookies on our website. A cookie is a small text file which is placed onto your computer (or other electronic device) when you visit our website. This enables us to monitor how many times you visit the website, which pages you go to, traffic data, location data and the originating domain name of your internet service provider.

- 5.1.1. You can find out more about the Cookies we use in our Cookies Policy available on the footer of our website.

- 5.1.2. You can set your browser not to accept cookies, however some of our website features may not function as a result.

- 5.1.3. For more information about cookies generally and how to disable them you can visit:  
[www.allaboutcookies.org](http://www.allaboutcookies.org)

### 5.2. Blocking Cookies and Changing Settings

- 5.2.1. You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website.

- 5.2.2. Most web browsers allow some control of most cookies through the browser settings, For further information about cookies and how to disable them please go to [allaboutcookies.org](http://allaboutcookies.org).

- 5.2.3. To opt out of being tracked by Google Analytics across all websites, visit <http://tools.google.com/dlpage/gaoptout>.

## 6. Third Party Websites

- 6.1. Our Privacy Statement does not apply to services offered by other companies or individuals, including products or sites that may be displayed to you in "car search" results. Our Privacy Statement does not cover the information practices of other companies and organisations that advertise our services and that may use cookies, pixel tags and other technologies to serve and offer relevant ads.

## 7. Email

- 7.1. Emails sent via the internet can be subject to interception, loss or possible alteration, therefore we cannot guarantee their security. Although we will do our best to protect your personal information, we cannot guarantee the security of your data sent by email and therefore will have no liability to you for any damages or other costs in relation to emails sent by you to us via the internet. If you would like to contact us, please see the section below or use our contact us page.

## 8. Children's Privacy

- 8.1. It is highly unlikely that we will target particular products at a different age group, the Website is not intended for use by individuals under the age of 18 without the agreement and involvement of a parent or guardian.

8.1.1. We do not knowingly collect personal information from individuals under the age of 18. Where we are able to identify that an individual under the age of 18 has used our services (e.g. the individual may have entered a date of birth into the application form) we will ensure no further processing of the individual's data takes place except for the purpose of erasing the data.

## 9. Data security

9.1. We have adopted appropriate technical and organisational measures to protect the personal data we collect and use having regard to the state of the art, the nature of the data stored and the risks to which the data is exposed to human action or the physical or natural environment. However, as effective as our security measures are, no security system is impenetrable. We cannot guarantee the security of our database.

9.1.1. The transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we have received your information, we will use procedures and security features to try to prevent unauthorised access

9.1.2. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

## 10. Links to other websites

10.1. Our website may contain links to and from other websites (e.g. social media sites such as Twitter, Flickr, YouTube and Facebook). Unless we own such websites, we accept no responsibility for the way in which they process your personal data. You are recommended to check the privacy policy of each website before you submit any personal data to it. or privacy information relating to these other third-party websites, please consult their policies as appropriate.

10.1.1. Facebook: [Cookies Privacy Notice](#)

10.1.2. Twitter: [Cookies Privacy Notice](#)

10.1.3. LinkedIn: [Cookie Notice Privacy Notice](#)

10.1.4. Instagram: [Cookie Notice Privacy Notice](#)

## 11. Your rights

### 11.1. Your right to access data

11.1.1. We always aim to be as open as we can and allow people access to their personal information. Where we hold your personal data, you can make a 'subject access request' to us and we will provide you with:

11.1.2. a description of it;

11.1.3. an explanation of why we are holding it;

11.1.4. information about who it could be disclosed to; and

11.1.5. a copy of the information in an intelligible form – unless an exception to the disclosure requirements is applicable.

11.1.6. If you would like to make a 'subject access request' please make it in writing to our contact email address noted in section 2.3 and mark it clearly as 'Subject Access Request'.

11.1.7. If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone.

11.1.8. Unless you agree a different time, we will complete your subject access request within one month.

11.2. **Right to stop marketing messages**

11.2.1. You always have the right to stop marketing messages. We will usually include an unsubscribe button in any marketing emails. If you do wish to unsubscribe, please just click the unsubscribe button and we will promptly action that request. Alternatively, you can update your marketing preferences by contacting us at any-time. Our contact details are shown in section 2.

11.3. **Right to be forgotten**

11.3.1. If we hold personal data about you, but it is no longer necessary for the purposes that it was collected and cannot otherwise be justified – you have the right to request that we delete the data.

11.4. **Right to restrict data**

11.4.1. If we hold personal data about you and you believe it is inaccurate you have the right to request us to restrict the data until it is verified. You also have the right to request that the data is restricted where you have a right to it being deleted but would prefer that it is restricted.

11.5. **Transferring your personal data**

11.5.1. Where we rely on your consent as the legal basis for processing your personal information or need to process it in connection with your contract, as set out under section 4 How we use your personal information, you may ask us to provide you with a copy of that information in a structured data file. We will provide this to you electronically in a structured, commonly used and machine-readable form, such as a CSV file.

11.5.2. You can ask us to send your personal information directly to another service provider, and we will do so if this is technically possible. We may not provide you with a copy of your personal information if this concerns other individuals or we have another lawful reason to withhold that information

11.6. **Right to complain**

11.6.1. You always have the right to complain to the personal data regulator, the ICO. You may also be entitled to seek compensation if there has been a breach of data protection laws. Our ICO Reference number is Z1154075

12. **Policy updates**

12.1. This policy was last updated on 21 February 2022

12.2. Our Privacy Statement applies to all of the services offered by us. We will keep this Privacy Statement under review and make updates from time to time. We will not reduce your rights under Privacy Statement without your explicit consent. We will post any Privacy Statement changes on this page and, if the changes are significant, we will provide a more prominent notice (including, for certain services, email notification of Privacy Statement changes). If you do not accept the amended Privacy Statement, you should stop using the Website; this may affect our ability to provide certain products and services to you. Please see the section regarding Your Rights for further information regarding continued processing.

