



Ikano Bank Privacy Notice for Loans and Store Cards

Ikano takes the handling and protection of personal information very seriously. This Privacy Notice provides you with important information about what personal information we process, as well as other important information such as the purposes for which we will process your personal information, as well as giving you information about your rights in relation to your personal information. If you are not able to read this privacy notice now, we recommend that you do take the time to read it, or at least those sections of it which are most important to you so that you are aware of how we will process your personal information.

Data Protection Law changed on 25 May 2018.

This notice sets out your rights under the new laws.

In order to assist you to quickly and easily identify what information is relevant to you, we've provided a list of headings below which will take you quickly to the areas that you are interested in.

What should you do if your personal information changes?

You should tell us without delay so that we can update our records. The contact details for this purpose are:

By telephone: 0371 781 3080 (+44 371 781 3080 if you're calling from abroad).

Calls to this number cost the same as a call to a standard "01" or "02" landline number, even when calling from a mobile. Calls to this number are also included in any bundled minutes or free talk time that covers landline calls. Where calls are made outside of a bundle you will be charged at the national rate. The actual cost you are charged will depend on your phone provider, please check with them if you are unsure.

By writing to: Ikano Bank AB (publ), PO Box 10081, Nottingham, NG2 9LX.

Please note that it is not always possible to update information immediately, so if you have provided us with updated personal information please allow a month for us to update your records.

What is the source of your personal information?

We will generally collect your personal information from you directly through our application forms. In addition, we obtain your personal information from other sources such as Fraud Prevention Agencies, Credit Reference Agencies and other sources which may include your employer, landlord, other lenders, HMRC, DWP, publically available directories and information (e.g. telephone directory, social media, internet, news articles), debt recovery and/or tracing agents, other organisations to assist in prevention and detection of crime, police and law enforcement agencies.

Some of the personal information obtained from Credit Reference Agencies will have originated from publicly accessible sources. In particular, Credit Reference Agencies draw on court decisions, bankruptcy registers and the electoral register (also known as the electoral roll). We explain more about Credit Reference Agencies below. We have also mentioned above in the lists of personal information that we process some of the CRAs' other sources of information (which are our own source of information too).



What are the legal grounds for our processing of your personal information (including when we share it with others)?

Data protection laws require us to explain what legal grounds justify our processing of your personal information (this includes sharing it with other organisations). For some processing more than one legal ground will be relevant (even where we rely on a consent for non-marketing purposes).

Here are the legal grounds that are relevant to us:

Processing necessary to perform our contract with you

This purpose includes such processing as is necessary for entering into the loan or store card agreement with you. It will also include processing that is undertaken prior to entering into our agreement with you (i.e. during the application stage). The processing will include:

- Administering and managing your loan/store card (as applicable) and services relating to that, updating your records, tracing your whereabouts to contact you about your account and doing this for debt recovery purposes (if this becomes necessary);
- All stages and activities relevant to managing your loan/store card (as applicable) including enquiry, application, administration and management of accounts and information relating to your purchase transactions and payments;
- For some of our profiling and other automated decision making (further detail is provided below).

Where processing is necessary for our legitimate interests

This will include processing which, on balance, we consider is in our legitimate interests and which do not cause you undue prejudice. Our legitimate interests are:

- Administering and managing your loan or store card account (as may be applicable) and services relating to that, updating your records, tracing your whereabouts to contact you about your account and doing this for recovering debt;
- To test the performance of our products, services and internal processes;
- To adhere to guidance and best practice under the regimes of governmental and regulatory bodies such as HMRC, the Financial Conduct Authority, the Prudential Regulation Authority, the Financial Ombudsman, and the Information Commissioner's Office;
- For management and audit of our business operations including accounting;
- To carry out searches at Credit Reference and/or Fraud Prevention Agencies pre-application, at the application stage, and periodically after that;
- To carry out monitoring and to keep records (see below);
- To administer our good governance requirements such as internal reporting and compliance obligations or administration;
- For market research and analysis and developing statistics. Please note your data may be retained and processed at a later date for analytical purposes whether or not your application succeeds;
- For marketing communications (where it is lawful for us to do so and where you have not objected to the use of your personal information for these purposes);
- For some of our profiling and other automated decision making (such as assessing creditworthiness for credit limit increase offers), in particular where this does not have a legal effect or otherwise significantly affect you, and:

- When we share your personal information (to achieve the above purposes) with other people or organisations:
 - Members of our Group;
 - Our legal and other professional advisers, auditors and actuaries;
 - Financial institutions and trade associations;
 - Governmental and regulatory bodies such as HMRC, the Financial Conduct Authority, the Prudential Regulation Authority, the Financial Ombudsman, and the Information Commissioner's Office;
 - Tax authorities who are overseas for instance if you are subject to tax in another jurisdiction we may share your personal information directly with relevant tax authorities overseas (instead of via HMRC);
 - Other organisations and businesses who provide services to us such as debt recovery agencies, back up and server hosting providers, IT software and maintenance providers, document storage providers and suppliers of other back office functions such as sending letters, statements and other correspondence;
 - Buyers and their professional representatives as part of any restructuring or sale of our business or assets;
 - Credit Reference and/or Fraud Prevention Agencies ([Experian](#), [Equifax](#) and [CallCredit](#));
 - Market research organisations who help us to develop and improve our products and services.

Processing necessary to comply with our legal obligations

- For compliance with laws that apply to us;
- For establishment, defence and enforcement of our legal rights or those of any other member of our Group;
- For activities relating to the prevention, detection and investigation of crime;
- To carry out identity checks, anti-money laundering checks, and checks with Fraud Prevention Agencies pre-application, at the application stage, and periodically after that;
- To carry out monitoring and to keep records (see below);
- To deal with requests from you to exercise your rights under data protection laws;
- To process information about a crime or offence and proceedings related to that (in practice this will be relevant if we know or suspect fraud); and
- When we share your personal information (to achieve the above purposes) with these other people or organisations:
 - Members of our Group;
 - Other payment services providers such as when you ask us to share information about your account with them;
 - Law enforcement agencies and governmental and regulatory bodies such as HMRC, the Financial Conduct Authority, the Prudential Regulation Authority, the Financial Ombudsman, the Information Commissioner's Office, Fraud Prevention Agencies (depending on the circumstances of the sharing), the Swedish Financial Services Authority (Finansinspektionen), the Swedish Data Protection Authority;
 - Courts and to other organisations where that is necessary for the administration of justice, to protect vital interests and to protect the security or integrity of our business operations.



Processing with your consent

- When you request that we share your personal information with someone else and consent to that;
- For marketing communications purposes to personalise and improve your digital experience, communications, or to carry out profiling for the purposes of targeting marketing offers and market research if we have your consent to do so;
- For some of our processing of special categories of personal data such as about your health or if you are a vulnerable customer (and the reason(s) why we are asking for your consent will be explained to you when we ask for that explicit consent).

Processing for a substantial public interest

Our processing of your personal data for substantial public interest is where this helps us to meet our broader social obligations as set out below:

- Processing of your special categories of personal data such as about your health or if you are a vulnerable customer.
- Processing that we need to do to fulfil our legal obligations and regulatory requirements;
- When we share your personal information with other people and organisations if they need to know that you are a vulnerable customer, and your relatives, social services, your carer, the person who has power of attorney over your affairs if you have given the third party authorisation to act on your behalf.

Who we are and how to contact us and our Data Protection Officer

Ikano Bank AB (publ) is a data controller of your personal information and can be contacted at P O Box 10081, Nottingham, NG2 9LX. Personal information means information that is about you or from which we can identify you. This privacy notice describes how we deal with your personal information. We are the data controller of this information under relevant data protection laws because in the context of our business relationship with you we decide how and why it is processed in the ways explained in this privacy notice. When we use terms such as we, us and our in this notice, we mean Ikano Bank AB (publ).

Our Data Protection Officer can be contacted if you have queries about this privacy notice or wish to exercise any of the rights mentioned in it.

You will see at the end of this privacy notice that we mention the privacy notices of Fraud Prevention Agencies and Credit Reference Agencies. These are separate organisations who will process your personal information for their own purposes and separately from us. As such, we intend to share their privacy notices with you as well. Please read them carefully and contact those organisations if you have questions (their details are in their privacy notices).

This privacy notice may be updated from time to time. We may send you an updated copy (depending on whether we are required to do that or not) but you can also find the current version on www.ikano.co.uk/ikano-finance-privacy-notice

What kinds of personal information about you do we process?

We have set out below a description of the types of personal information which we hold about you and which we will process when you take out a loan or a store card with us. This will depend on the products or services you apply for and (if your application is successful) obtain from us. Before we explain what particular



information we need in relation to loan agreements or store cards (as may be applicable to you) we will explain what information is relevant to all of our products and services including loan agreements and store cards.

Personal information that we generally process in connection with both our loan and store card products. This includes:

- Your title, full name, your contact details, including for instance your email address, home and mobile telephone numbers;
- Your home address, correspondence address (where different from your home address) and address history;
- Your date of birth and/or age, e.g. to make sure that you are eligible to apply for the product and/or that it is suitable for you;
- Records of how you have contacted us and, if you get in touch with us online, details such as your mobile phone location data, IP address and MAC address;
- Personal information which we obtain from Fraud Prevention Agencies (see the section on 'Fraud Prevention Agencies' below), or Credit Reference Agencies (see the 'Credit Reference' section below);
- Some special categories of personal data such as about your health or if you are a vulnerable customer (more details below);
- Your financial details e.g. your salary and details of other income, details of your savings, details of your expenditure;
- Details about all of your existing borrowings and loans;
- Personal information about your credit history which we obtain from Credit Reference Agencies including data which originates from Royal Mail (UK postal addresses), local authorities (electoral roll), the Insolvency Service, Companies' House, other lenders and providers of credit (who supply data to the credit reference agencies ("CRAs")), court judgments, decrees and administration orders made publicly available through statutory public registers (see the section on 'Credit Reference Agencies' below);
- Information about your employment status including whether you are employed, retired or receive benefits;
- Your marital status, family, lifestyle or social circumstances if relevant to the product (e.g. the number of dependents you have);
- Personal information provided by you to us in correspondence, whether by email, written letter, or telephone call (as telephone calls to and from us are recorded for training, monitoring and security purposes).

For loan agreements specifically, we will collect and process the following information:

- details of any purchases that are linked to your loan and of any retailer who processed the sale of these goods.

For store cards specifically, we will collect and process the following information:

- transactions data, that is information about the nature, cost, date and time of any purchases made.

How do we share your information with credit reference agencies?

In order to process your application, we will perform credit and identity checks on you with one or more credit reference agencies ("CRAs"). Where you take banking services from us we will also make periodic searches at CRAs to manage your account with us. To do this, we will supply your personal information to CRAs and they will give us information about you. This will include information from your loan/store card application and



about your financial situation and financial history. CRAs will supply to us both public (including the electoral register) and shared credit, financial situation and financial history information and fraud prevention information.

We will use this information to:

- Assess your creditworthiness and whether you can afford to take the product;
- Verify the accuracy of the data you have provided to us;
- Prevent criminal activity, fraud and money laundering;
- Manage your account(s);
- Trace and recover debts; and
- Ensure any offers provided to you are appropriate to your circumstances.

We will continue to exchange information about you with CRAs while you have a relationship with us. We will also inform the CRAs about your settled accounts. If you borrow and do not repay in full and on time, CRAs will record the outstanding debt. This information will be supplied to other organisations by CRAs.

When CRAs receive a search from us your credit file will be updated to show that we have made a credit search and this will be seen by other lenders.

The identities of the CRAs, their role also as fraud prevention agencies, the data they hold, the ways in which they use and share personal information, data retention periods and your data protection rights with the CRAs are explained on the links below.

[Experian \(http://www.experian.co.uk/crain/index.html\)](http://www.experian.co.uk/crain/index.html)

[Equifax \(https://www.equifax.co.uk/crain\)](https://www.equifax.co.uk/crain)

[CallCredit \(https://www.callcredit.co.uk/crain\)](https://www.callcredit.co.uk/crain)

How do we share your information with Fraud Prevention Agencies?

The personal information we have collected from you will be shared with fraud prevention agencies who will use it to prevent fraud and money-laundering and to verify your identity. If fraud is detected, you could be refused certain services, finance or employment. Further details of how your information will be used by us and these fraud prevention agencies, and your data protection rights, can be found in detail at the URL link which we refer to later on in this privacy notice.

How and when can you withdraw your consent?

Much of what we do with your personal information is not based on your consent, instead it is based on other legal grounds (as described above). For processing that is based on your consent, you have the right to take back that consent for future processing at any time. You can do this by contacting us using the details below. The consequence might be that we cannot send you some marketing communications or that we cannot take into account special categories of personal data such as about your health or if you are a vulnerable customer (but these outcomes will be relevant only in cases where we rely on explicit consent for these activities).

By telephone: 0371 781 3080 (+44 371 781 3080 if you're calling from abroad).

Calls to this number cost the same as a call to a standard "01" or "02" landline number, even when calling from a mobile. Calls to this number are also included in any bundled minutes or free talk time that covers landline calls. Where calls are made outside of a bundle you will be charged at the national rate. The actual cost you are charged will depend on your phone provider, please check with them if you are unsure.



By writing to: Ikano Bank AB (publ), PO Box 10081, Nottingham, NG2 9LX.

Please note that it is not always possible to update information immediately, so if you have provided us with updated personal information please allow a month for us to update your records.

Is your personal information transferred outside of the UK or the EEA?

We operate in the UK but sometimes your personal information may be transferred outside the UK or the European Economic Area. If it is processed within Europe or other parts of the European Economic Area (EEA) then it is protected by European data protection standards.

Some countries outside the EEA do have adequate protection for personal information under laws that apply to us. We will make sure that suitable safeguards are in place before we transfer your personal information to countries outside the EEA which do not have adequate protection under laws that apply to us except in cases where what are called 'derogations' apply.

The safeguards that we will use to protect your personal information in relation to international transfer include contractual obligations imposed on the recipients of your personal information. Those obligations require the recipient to protect your personal information to the standard required in the European Economic Area. Safeguards also include requiring the recipient to subscribe to 'international frameworks' intended to enable secure data sharing and where the framework is the means of protection for the personal information.

Do you have to provide your personal information to us?

We are unable to provide you with a loan or a store card or to process your application without having personal information about you (save for information which is provided to us solely on the basis of consent - that is in relation to marketing and possibly where you have provided special personal data to us about your health or if you are a vulnerable customer). Otherwise, your personal information is required before you can enter into the relevant contract with us, or it is required during the life of that contract, or it is required by laws that apply to us.

Do we do any monitoring which involves the processing of your personal information?

By monitoring, we mean any listening to, recording of, viewing of, intercepting of, or taking and keeping records (as the case may be) of calls, emails, text messages, social media messages and other communications. We may monitor where permitted by law and we will do this where the law requires it. In particular, where we are required by the Financial Conduct Authority's regulatory regime to record certain telephone calls (as relevant) we will do so.

Some of our monitoring may be to comply with regulatory rules, self-regulatory practices or procedures relevant to our business, to prevent or detect crime, in the interests of protecting the security of our communications systems and procedures, to have a record of what we have discussed with you and actions agreed with you, to protect you and to provide security for you (such as in relation to fraud risks on your account) and for quality control and staff training purposes.

We may conduct short term carefully controlled monitoring of your activities on your loan and / or store card account where this is necessary for our legitimate interests or to comply with our legal obligations. For instance, where we suspect fraud, money laundering or other crimes. Telephone calls between us and you in connection with your application and your loan or store card may be recorded to make sure that we have a



record of what has been discussed and what your instructions are. We may also record these types of calls for the quality control and staff training purposes.

Profiling and other automated decision making

Ikano's credit decisions are based on automated processing including profiling of customers. This is necessary in order to ensure greater consistency and fairness in the decision-making process, reduce the risk of customers failing to meet payments and also enable the delivery of decisions within a shorter timeframe. The automated decision-making is based on information provided by customers on product application forms, information about previous account conduct, including any payment arrears, as well as public records information such as information from credit bureaus. The credit scoring methods used are regularly tested and updated to ensure they remain fair, effective and unbiased.

Ikano may also use your data to personalise and improve your digital experience, communications, or to carry out profiling and market research. We may also profile your data to send you marketing offers if we have your consent to do so.

In connection with an automated credit decision, you have the right to obtain human intervention to express your point of view and to contest the decision. If you would like to appeal against a decision, please write to us. Please include a recent copy of your credit report and any other financial information that you feel we should be aware of. We will respond to your appeal within 14 days.

How long is your personal information retained by Ikano?

Unless you are notified by us of any variation, we will hold your personal information for the following periods:

- Retention in case of queries: We will retain the personal information that we need to keep in case of queries from you (for instance, if you apply unsuccessfully for a product or service) for 12 months unless we have to keep it for a longer period (see directly below);
- Retention in case of claims: We will retain the personal information that we need to keep for the period in which you might legally bring claims against us which in practice means at least 6 years after your account is closed unless we have to keep it for a longer period (see directly below); and
- Retention in accordance with legal and regulatory requirements: We will retain the personal information that we need to keep even after the relevant contract you have with us has come to an end for at least 6 years and this will be to satisfy our legal and regulatory requirements.

If you would like further information about our data retention practices, contact our Data Protection Officer at Ikano Bank AB (publ), P O Box 10081, Nottingham, NG2 9LX.

What are your rights under data protection laws?

Here is a list of the rights that all individuals have under data protection laws. They do not apply in all circumstances. If you wish to exercise any of them we will explain at that time if they are engaged or not. The right of data portability is only relevant from May 2018.

- The right to be informed about your processing of your personal information;
- The right to have your personal information corrected if it is inaccurate and to have incomplete personal information completed;
- The right to object to processing of your personal information;
- The right to restrict processing of your personal information;
- The right to have your personal information erased (the "right to be forgotten");



- The right to request access to your personal information and to obtain information about how we process it;
- The right to move, copy or transfer your personal information (“data portability”);
- Rights in relation to automated decision making which has a legal effect or otherwise significantly affects you.

You have the right to complain to the Information Commissioner's Office which enforces data protection laws: <https://ico.org.uk>

If you wish to exercise any of these rights against the Credit Reference Agencies or the Fraud Prevention Agencies who are data controllers in their own right, you should contact them directly.

Data anonymisation and use of aggregated information

Your personal information may be converted into statistical or aggregated data which cannot be used to re-identify you. It may then be used to produce statistical research and reports. This aggregated data may be shared and used in all the ways described in this privacy notice.

Your marketing preferences and what this means

We may use your home address, phone numbers, email address and social media (e.g. Facebook, Google and message facilities in other platforms) to contact you according to your marketing preferences. This means we do this only if we have a legal ground which allows it under data protection laws - see above for what is our legal ground for marketing. You can stop our marketing at any time by calling us or writing to us or by following the instructions on how to do that in the marketing email or other communication.

Data privacy notices from other organisations

We have mentioned that we share your personal information with Fraud Prevention Agencies and Credit Reference Agencies. They require us to pass on to you information about how they will use your personal information to perform their services or functions as data controllers in their own right. These notices are separate from our own. They are:

[Experian \(http://www.experian.co.uk/crain/index.html\)](http://www.experian.co.uk/crain/index.html)

[Equifax \(https://www.equifax.co.uk/crain\)](https://www.equifax.co.uk/crain)

[CallCredit \(https://www.callcredit.co.uk/crain\)](https://www.callcredit.co.uk/crain)

[Fraud Agencies https://ikano.co.uk/-/media/uk/united-kingdom/ikano-co-uk/live-documents/fair-processing-notices-for-the-purpose-of-fraud-prevention-and-detection.pdf](https://ikano.co.uk/-/media/uk/united-kingdom/ikano-co-uk/live-documents/fair-processing-notices-for-the-purpose-of-fraud-prevention-and-detection.pdf)

Who is in our Group?

As at the date of this privacy notice, the members of our Group with whom we may share your data are: Ikano Bank AB (publ) and Quant Marketing. You should check our website at ikano.co.uk from time to time in case of any changes to our Group.

This policy was last updated on 18/06/18

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