

# THE TRADE CENTRE GROUP PLC (TTCG)

## Privacy Notice

We are The Trade Centre Group Plc trading in Wales under the trading name The Trade Centre Wales and trading in England under the trading name The Trade Centre UK.

The Trade Centre Group Plc ('we', 'us', 'our') is authorised and regulated by the Financial Conduct Authority (our registration number is 689365) and is permitted to carry on relevant regulated consumer credit activities including acting as a credit broker and not a lender.

TTCG respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) or visit one of our sites or instruct our services and will tell you about your privacy rights and how the law protects you.

### 1. IMPORTANT INFORMATION AND WHO WE ARE

#### Purpose of this privacy notice

This privacy notice aims to give you information on how TTCG collects and processes your personal data through your use of our website, or our supply of products and services, including any data you may provide when you use our products and services or receive marketing information about our products and any special offers.

Our website, products and services are not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide you on specific occasions when we are collecting or processing personal data about you, so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

#### Controller

TTCG is the controller and is responsible for your personal data (referred to as **TTCG, we, us** or **our** in this privacy notice).

#### Data Protection Officer

We have appointed a data protection officer (**DPO**) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights,

please contact the DPO using the details set out below.

#### The DPO can be contacted as follows:

Email address: [dpo@ttcg.co.uk](mailto:dpo@ttcg.co.uk)

Postal address: Euro Centre, Neath Abbey Business Park, Neath Abbey, SA10 7DR

Telephone number: (01792) 814300

You have the right, if you wish to do so, to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

### Changes to the privacy notice and your duty to inform us of changes

This version was last updated on 14 November 2024.

The accuracy of your information is important to us. Please keep us informed if your personal data changes during your relationship with us. If you change your postal address, email address or your telephone number, please let us know by contacting our marketing department on [marketing@ttcg.co.uk](mailto:marketing@ttcg.co.uk)

### Third-party links

Our website may include links to third-party websites, plugins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

### 2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, username or similar identifier, marital status, title, date of birth, gender, address history, employment information, income and ID data.

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- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes income, bank details, bank account, financial information and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products, and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Vehicle Identification** which includes: make, model, vehicle registration number and mileage.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

## If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

## 3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data about you including:

**Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in an application form, or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- Apply for or purchase any of our products or services, including any of our vehicles.
- Apply for credit or hire purchase facilities.
- Create an account on our website.
- Request marketing to be sent to you.
- Give us some feedback.

You confirm you have the consent of any other person whose details are provided by you in connection with your application or enquiry to provide that person's information to us and for us to use that person's information for the processing of any application that you may submit as a joint application:

- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below:
  - Contact, Financial and Transaction Data from finance companies/partners, potential lending partners and credit brokers (as further detailed in paragraph 4 below).
  - Contact, Financial and Transaction Data from credit reference agencies and fraud prevention agencies (as further detailed in paragraph 4 below).
  - Identity, Contact and Financial Data from any person with whom you are submitting a joint application to purchase a vehicle or for credit or hire purchase facilities.
  - Identity, Contact and Financial Data from search information providers.

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#### 4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party).
- Where we need to comply with a legal or regulatory obligation.
- Where you have provided your consent.

#### PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are, where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal grounds we are relying on to process your personal data where more than one ground has been set out in the table below.

| Purpose/Activity  | Type of data   | Lawful basis for processing including basis of legitimate interest   |
|---|--|--|
| In the course of helping you, the customer, to purchase a vehicle and also in preparing, at your request, an application for hire purchase or loan facility | Identity, Contact, Financial, Transaction, Profile                                 | a) performance of a contract;<br>b) consent;<br>c) necessary for our and the third party hire purchase or loan provider's legitimate interests (to enable you to purchase a vehicle and/or related products/services from us or the third party)   |
| Disclosure to our lending/finance partners for the purpose of providing you, the customer, with a hire purchase agreement and personal loan facility        | Identity, Contact, Financial, Transaction, Profile                                 | a) consent;<br>b) necessary for our and the third party lending/finance provider's legitimate interests (to enable you to purchase a vehicle and/or related products/services from us or the third party)  |
| To obtain a credit reference from a credit reference agency   | Identity, Contact, Financial, Transaction, Profile                                 | Performance of a contract with you   |
| Onfido Limited – identity verification platform   | Identity, applicant details extracted from the document e.g. date of birth, photo. | a) performance of a contract;<br>b) consent;<br>c) necessary for our and the third party hire purchase or loan provider's legitimate interests (to enable you to purchase a vehicle and/or related products/services from us or the third party)   |
| To assist you in purchasing a Lifetime Warranty   | Identity, Contact, Financial, Transaction, Profile                                 | a) consent;<br>b) necessary for our and our warranty administrator's (EMaC Limited) legitimate interests, and for the subscription facility provider's (Payment Assist Limited) interests (to enable you to purchase a vehicle and/or related products/services from us or EMaC Limited) |
| To assist you with your payment subscriptions   | Identity, Contact, Financial, Transaction  | a) consent;<br>b) necessary for us, and our subscription facility provider is (Payment Assist Limited) legitimate interests<br><br>(to enable you to purchase a vehicle and/or related products/services from us or EMaC Limited)  |

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| Purpose/Activity   | Type of data  | Lawful basis for processing including basis of legitimate interest  |
|--|---|---|
| To assist you with your payment subscriptions  | Identity, Contact, Financial, Transaction   | a) consent;<br>b) necessary for us, and our subscription facility provider is (Payment Assist Limited) legitimate interests<br><br>(to enable you to purchase a vehicle and/or related products/services from us or EMaC Limited) |
| Introduction to Premia Solutions Limited for a 'Free of Charge' 30-Day Extendable Gap Insurance                        | Identity, Contact, vehicle make, vehicle model, vehicle registration.   | a) consent;<br>b) necessary for our and the third party lending/finance provider's legitimate interests (to enable you to purchase a vehicle and/or related products/services from us or the third party)                         |
| To process an on-line part exchange valuation request  | Identity, Contact, Financial  | Performance of a contract with you  |
| To process a request for a discount voucher  | Identity, Contact   | Performance of a contract with you  |
| To process an online finance application   | Identity, Contact, Financial, Transaction, Profile  | a) consent;<br>b) necessary for our and the third party finance provider's legitimate interests (to enable you to purchase a vehicle and/or related products/services from us or the third party)                                 |
| To register you as a new customer  | (a) Identity, Contact   | Performance of a contract with you  |
| The V5C document, also known as the V5 form or logbook   | Identity, Contact, which contains the personal details of the registered keeper and previous registered keepers | a) Necessary to comply with our legal obligation.<br>b) Necessary for our legitimate interests i.e. that the processing is necessary to achieve a legitimate interest pursued by you or a third party.                            |
| To process and deliver your order including:<br>Manage payments, fees and charges collect and recover money owed to us | Identity, Contact, Financial, Transaction, Marketing and, Communications  | a) Performance of a contract with you<br>b) Necessary for our legitimate interests (to recover debts due to us)   |
| To carry out information searches (such as anti-money laundering and fraud and crime prevention searches)              | Identity, Contact, Financial, Transaction   | Necessary to comply with a legal obligation   |
| To enable you to complete a survey   | Identity, Contact, Profile, Usage, Marketing and Communications   | a) Performance of a contract with you,<br>b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)   |

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| Purpose/Activity  | Type of data  | Lawful basis for processing including basis of legitimate interest   |
|---|---|--|
| To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)   | Identity, Contact, Technical  | <p>a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>b) Necessary to comply with a legal obligation</p> |
| To enable you to complete a survey  | Identity, Contact, Profile, Usage, Marketing and Communications   | <p>a) Performance of a contract with you,</p> <p>b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</p>   |
| To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you  | Identity, Contact, Profile, Usage, Marketing and, Communications, Technical   | Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)  |
| To enable you to complete a survey Digital Advertising  | Name, IP address and any other personal data you have shared with digital advertisers such as but not limited to Google Ads and their products and services such as Google Maps etc. For more information on how Google Ads manages your data, please go to Privacy Policy – Privacy & Terms – Google | Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy).   |
| To use data analytics to improve our website, products/services, marketing, customer relationships and experiences  | Technical, Usage  | Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)  |
| To make suggestions and recommendations to you about goods or services that may be of interest to you   | Identity, Contact, Technical, Usage, Profile, Marketing and Communications  | <p>Necessary for our legitimate interests (to develop our products/services and grow our business)</p> <p>Consent</p>  |
| Disclosure to third party companies that have allocated any fines or proceedings against the hire vehicle while in your possession  | Identity, Contact.  | Necessary for our and the third party company's legitimate interests (to enable the third party company to recover debts due to them)  |
| Disclosure to any third parties that have issued any fines, penalties, charges or proceedings relating to any vehicle you may have purchased from us, since the date of purchase, to enable such third parties to pursue any such fines, penalties, charges or proceedings against you directly as the owner of the vehicle | Identity, Contact   | Necessary to comply with a legal obligation. This would cover, for example, where the driver has committed a speeding offence/traffic light violation and we are required to provide your identity and contact details   |

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## If you fail to provide personal data

When you complete a free finance check or an on-line application with TTCG and to better establish your potential eligibility for credit or hire purchase facilities, DealTrak Limited has been appointed as a processing agent for and on behalf of TTCG and our select panel of finance providers (lenders). DealTrak Limited will analyse your credit information to determine your financial status; this is known as a “soft search” and uses your information for the purposes of identifying and ranking the most appropriate credit products for you, taking into account your personal information.

Searches are carried out by one or more credit reference agencies (CRA): Experian, Equifax, TransUnion Information (Callcredit).

A “soft search” checks against publicly available information such as the Electoral Register, County Court Judgments (CCJs), bankruptcy or repossession information. These checks are known as a “soft search” and are visible to only you.

A “soft search” is an initial look at certain information on your credit report. Companies perform soft searches to decide how successful your application would be without conducting a full examination of your credit history. To give you the best opportunity to establish your potential eligibility for credit or hire purchase facilities, we may use one or more CRAs to perform a “soft search”.

A soft search will also combine the factual information you provide us as part of your application, and publicly available information such as the Electoral Register, County Court Judgments (CCJs), bankruptcy or repossession information. Based on this information, you may be provided with an automated decision based on the outcome of this information.

For more information on your rights, please see section 9 below.

If you are seeking credit or hire purchase facilities, TTCG will need to process your personal data for the purpose of submitting an application to our lending partners (finance companies) who may wish to search your credit profile with one of the Credit Reference Agencies (CRAs) for data relating to your financial situation and financial history. These searches may be referred to as “hard searches” or “credit application searches” and may be visible to other third parties, such as other potential lenders. “Hard searches” will place a search footprint on your credit file.

CRAs, also perform the role of 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 in more detail within the Credit Reference Agency Information Notice

(CRAIN) below.

These records will be shared with other organisations and may be used by them to consider further applications for credit and credit related services, to trace debtors, recover debt, and for fraud prevention. The finance company may also check your details with fraud prevention agencies, which themselves share their records with other organisations. If you wish to receive details of credit reference and fraud prevention agencies from whom we and the finance company obtain information and to whom we pass information about you, you can do this by contacting our DPO in writing or by e-mail at the address given earlier.

The finance company will continue to exchange information about you with credit reference agencies on an ongoing basis, including your settled accounts and any debts not fully repaid on time. Credit reference agencies will share your information with other organisations.

If you are making a joint application, then your data will also be linked to the data of your spouse, any joint applicants, or other financial associates.

Our finance companies use the following credit reference agencies:

- **Equifax Europe UK Limited PO Box 3001**, Glasgow, GS1 2DT  
Website: [www.equifax.co.uk](http://www.equifax.co.uk)
- **Experian Plc** PO Box 8000, Nottingham, NG1 5GX  
Website: [www.experian.co.uk](http://www.experian.co.uk)
- **TransUnion Information Group Limited** 1 Park Ln, Leeds, LS3 1EP  
Website: [www.transunion.co.uk](http://www.transunion.co.uk)

The Credit Reference Agencies used by our lending partners have produced a Credit Reference Agency Information Notice (“CRAIN”) which details how they will use your data after we have provided it to them.

This information is available at CRAIN:

- <https://www.equifax.co.uk/crain/>
- <https://www.experian.co.uk/legal/crain/>
- <https://www.transunion.co.uk/legal/privacy-centre/pc-credit-reference>

## Automated decision making and profiling.

We will pass your personal data to our third-party lenders to make decisions about you. These lenders will use automated decision making tools which will automatically generate a credit score carried out by a credit reference agency.

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You have the right not to be subject to a decision based solely on automated processing, if this will have a legal or other significant effect on you.

Our third-party lenders will use automated decision making in:

- Credit scoring and affordability assessment. Data is collected from yourself through our online application forms and in-house systems. Credit Reference Agencies and other third parties require this information to assess your creditworthiness, affordability and potential eligibility for credit or hire purchase facilities you have applied for.

If you do not agree with the decision, you have the right to appeal the outcome of these automated decisions and ask for them to be reconsidered manually. A lender may request additional information to be provided by you before human oversight of a specific decision will take place.

- Fraud and money laundering risk identification. If, as part of processing your application, it reveals your behaviour to be consistent with money laundering or known fraudulent conduct or is inconsistent with information that you have provided previously, or you appear to have deliberately hidden your true identity, our lenders may decide that you pose a fraud and money laundering risk.
- Profiling which will be conducted by our lenders when assessing suitability of any new and existing loans.

## Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing. For these purposes we strive to provide you with choices regarding certain personal data uses, particularly around marketing. For the purposes of marketing, we may share your information with certain third parties, market research and analytics service providers, where you have provided consent. Your personal data will be used for personalised and non-personalised advertising; the data collected will be your name, IP address and other personal data you may choose to provide to use third party products and services.

## Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us or if you provided us with your

details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

## Opting out

You can ask us or third parties to stop sending you marketing messages or communications at any time by following the links located at the bottom of any marketing related emails we send to you or alternatively emailing [marketing@ttcg.co.uk](mailto:marketing@ttcg.co.uk), or by writing to our registered office: The Trade Centre Group Plc, Euro Centre, Neath Abbey Business Park, Neath Abbey, SA10 7DR.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service, purchase, warranty registration, product/service experience or other transaction.

## Cookies

For more information on Cookies please refer to our Cookie Policy. This explains what cookies are and how we use them.

## Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with third parties for the purposes set out in the table in paragraph 4 above.

These include:

- Can Can Car Finance Limited is a 100% subsidiary of The Trade Centre Group Plc.
- Third party marketing providers who assist us to provide any services requested from us, included but limited to: e-mail marketing services, SMS marketing services, television (TV), radio, direct mail services, telephone marketing services and digital advertising.
- Our lending and finance partners.

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- Onfido limited – identity verification platform, allowing customers to verify their identity using simple document verification.
- TCi Futures Limited who administer Freesure and Free Fuel for a Year for and on behalf of The Trade Centre Group PLC.
- EMaC Limited who administer the warranty.
- Payment Assist Limited who administer your subscription.
- Premia Solutions Limited is an introduction for a 'Free of Charge' 30-Day Extendable Gap Insurance.
- Third party IT providers who assist us to process your application for a car or for credit facilities.
- Credit reference agencies, fraud prevention agencies.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.
- Organisations who provide services for money laundering checks and other fraud and crime prevention purposes
- Service providers and agents who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities who require reporting of processing activities in certain circumstances.
- Third parties that may have issued any fines, penalties, charges or proceedings relating to any vehicle you may have purchased from us, since the date of purchase, including, for example (but not limited to), the Police, Councils and Private Parking companies, to enable such third parties to pursue any such fines, penalties, charges or proceedings against you directly as the owner of the vehicle.
- TCi Futures Limited who administer "Freesure" for and on behalf of The Trade Centre Group PLC

For further details of the third parties with whom we share your personal data, please contact our marketing department on [marketing@ttcg.co.uk](mailto:marketing@ttcg.co.uk). Please note that this list is not necessarily exhaustive and may be amended or updated from time to time.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We

do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## 5. DISCLOSURES OF YOUR PERSONAL DATA

Some of our external third parties are based outside the UK and the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the UK and the EEA. Whenever we transfer your personal data out of the UK and the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the applicable regulatory body.

Where we use certain service providers, we may use specific contracts approved by the applicable regulatory body which give personal data the same protection it has in the UK.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK and the EEA.

## 7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business interest and a need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 8. DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for

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which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

If you proceed to purchase a vehicle from us, you should be aware that we keep a record of all sales and transactions, including your personal data, for a period of 6 years and one month from either the date on which you acquired the vehicle or from the date on which our relationship ends (which we deem to be either the expiry date of our agreement with you or the expiry date of your agreement with the finance company). We hold your personal information for this period to fulfil the purpose for which it was collected, to meet our internal policy, legal, and regulatory requirements, and in some cases to establish, bring or defend legal claims.

Even if you do not proceed with the purchase of a vehicle, we will hold details of your personal data for a period of 12 months, to make suggestions and recommendations to you about goods or services that may be of interest.

We may record calls for training and monitoring purposes, which are retained for a period of 30 days.

If you submit a part-exchange valuation request or a request for a discount voucher but no purchase is subsequently made, your data will automatically be deleted after 12 months of no activity unless you have agreed otherwise.

If you submit an online finance application but no purchase is subsequently made, your data will automatically be deleted after 12 months of no activity unless you have agreed otherwise.

In some circumstances, we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## 9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

Request access to your personal data (commonly known as a 'data subject access request'). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no

good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Not to be subject to automated decision making or profiling based on your personal data, including profiling, which has legal or other similarly significant effects on you as a data subject. Data subjects have the right to express their point of view; and obtain human intervention.

If you wish to exercise any of the rights set out above, please contact our Data Protection Officer.

The Trade Centre Wales is a trading style of The Trade Centre Group PLC, a company registered in England and Wales, (registered number 4921555). Our registered offices are at Euro Centre, Neath Abbey Business Park, Neath Abbey, SA10 7DR.

The Trade Centre Group PLC is authorised and regulated by the Financial Conduct Authority (our registration number is 689365) and is permitted to carry on relevant regulated consumer credit activities including acting as a credit broker and not a lender.



## No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

## What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

## Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally, it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

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