

# Use of Personal Data Policy

## 1. BACKGROUND

This 'Use of Personal Data Policy' outlines the manner in which ezbob collects, processes, maintains, discloses and safeguards your personal data. ezbob is committed to ensure that when we collect, use and otherwise process personal data about our customers it is conducted in accordance with the General Data Protection Regulation (GDPR)

ezbob Ltd is a company registered in England and Wales, Registered Number: 07852687. ezbob Ltd is authorised and regulated by the Financial Conduct Authority for lending formed under the Consumer Credit Act 1974 (as amended). Firm Reference Number: 715194

ezbob is committed to ensure that its customers are fully aware of the changes and requirements presented by the General Data Protection Regulation (GDPR). The GDPR is the most comprehensive EU data privacy law in decades, and it came into effect on May 25, 2018.

## 2. BASIS FOR PROCESSING AND CONSENT

By commencing this application, you agree that you are entering into an agreement with us which gives us a legitimate basis to process your personal data, in line with GDPR requirements.

The processing of your personal data is mandatory for us to be able to provide you with our service. To be able to assess your loan application and come to a decision regarding your application for credit, information provided by you as well as information gathered from third parties must be collected, processed and reviewed. If we offer you and you accept a loan, we will continue to process your personal data to service the loan.

To ensure that processing is lawful, we will only process the data required for us to be able to provide you with our services.

### 3. DEFINITIONS

- **Personal Data** – has the meaning given to it in the General Data Protection Regulation
- **Processing** – means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- **Supervisory Authority** – means an independent public authority which is established by a Member State, in the United Kingdom it is the 'Information Commissioner's Office'
- **Data Controller** – has the meaning given to it in the General Data Protection Regulation. ezbob Ltd. is the Data Controller.
- **Data Processor** – has the meaning given to it in the General Data Protection Regulation.

### 4. CATEGORIES OF PERSONAL DATA

We will collect and process the following categories of your personal data:

- Full Name
- Data of Birth
- Phone Number
- Email Address
- IP Address
- Physical Address Information (personal and business)
- Financial Information (including bank account details)
- Information from third parties including credit reference agencies and fraud protection agencies.
- Records from HMRC and the electoral registry
- Information we may learn from the way you use and manage your account, from your transactions and from the payments made to your account.
- Information you authorise us to receive from your accounts with online marketplaces and payment systems
- Information we collect by using cookies and other tracking advices (including IP addresses, browser types, ISPs, operating systems, click stream data and related information related to your access and use of the internet or mobile apps.

## 5. HOW WE USE THE DATA

ezbob operates an online lending platform which allows customers to apply for a loan in a quick and automated manner. When you commence the loan application process, we use the services of third parties to process information provided by you to complete the assessment process of your application, maintain communication with you and service any loans you may take. We also process your personal data in the following ways:

- To verify your identity and credit standing and to enable us to consider and process your application for a loan or other products or services.
- To confirm your employment details.
- To detect, prevent and investigate actual and potential fraud, money laundering and other improper activities
- To collect unpaid loans and debt that may be owed by you to us.
- To help us to administer and service your account with us.
- To contact you in connection with your account.
- To generate statistics for our own internal purposes (including credit and/or behavior scoring, and market and product analysis).
- To update our website and mobile apps to better meet our clients' needs in the future.
- We also share your personal information with credit reference agencies and fraud protection agencies.
- Other purposes for which you give your specific permission or, in very limited circumstances, when required by law or where permitted under the terms of the Data Protection Act 1998 or the GDPR.

### 5.1. Third Parties

As part of our provision of the services, we engage third parties which take part in the validation process and processing of any submitted application. ezbob uses a number of third parties to complete risk and affordability assessment to be able to determine approval or rejection of a loan application, maintain communications with you and service any loans you may take.

If you call any of the telephone numbers listed in our website, marketing materials or in correspondence, we may record your call. These recordings are used for training, regulatory and quality control purposes to ensure that we continuously monitor and improve our customer service standard.

If there is (or is to be) any change in ownership of our business or assets, then we may wish to share your information so that the new (prospective) owners may continue to operate our business effectively and continue to provide services to our customers. This may include new shareholders or any organization that might take a legal or beneficial assignment or transfer of any agreements we have entered into with our customers (including any loan you enter into with us).

We share your personal data with these third parties who operate as Data Processors:

- Equifax Inc.
- Logical Glue Ltd
- Experian
- LexisNexis Group
- Iovation Inc.
- Idology Inc.
- HM Land Registry
- HM Revenue & Customs
- Interactions LLC
- Nebula Inc.
- Salesforce.com Inc.
- Pardot
- Tableau Software
- IBI Turbo Solutions Ltd
- AU10TIX Limited
- eBay Inc.
- Amazon.com Inc.
- PayPal Holdings, Inc.
- Xero Limited
- Free Agent Central
- Sage (UK) Ltd
- SimplyPostcode Software
- Yodlee Inc.
- Twilio Inc
- Modulr Finance limited
- GoCardless Ltd
- American Express Company

## **5.2. Transfer of Personal Data to a Third Country**

To complete all the necessary checks of a loan application, ezbob engages with number of third parties which result in the processing of personal data outside of the EEA. We comply with GDPR guidelines and requirements regarding the transfer of data to a third country outside of the EEA, including, where applicable entering into data processing agreements containing Standard Contractual Clauses under the GDPR.

The third parties which store data outside of the EEA are Iovation Inc., Idology Inc. and Salesforce.com Inc. Our wholly owned subsidiary in Israel, ezbob IT Ltd. also processes your personal data.

## 6. DATA PROTECTION OFFICER

ezbob Ltd has appointed a Data Protection Officer who can be contacted through the below indicated details:

**Telephone:** 0203 769 3128

**Address:** 120 New Cavendish Street, London W1W 6XX, United Kingdom

**E-mail:** [data.protection@ezbob.com](mailto:data.protection@ezbob.com)

## 7. DATA PROTECTION AUTHORITY

ezbob is based in the United Kingdom, therefore we answer to the UK Information Commissioner's Office (ICO) regarding Data Privacy and Protection. Our ICO registration number is **Z3307448**.

Despite our best efforts to avoid a data breach by ensuring that proper policies and procedures are put in place, in the unfortunate event that we will suffer a significant data breach that puts your personal data at risk, we will ensure to report this to the ICO within 72 hours of discovery to comply with our legal duties.

### 7.1. Lodging a Complaint

In the event that you think that there was a breach in the manner in which we use your personal data we encourage you to contact us to allow us to review the situation and address it appropriately. Nevertheless, please be aware that you have also the right to lodge a complaint with the data protection authority, the ICO.

## 8. SECURITY / DATA PROTECTION

We have implemented industry standard technological and organisational controls to secure the confidentiality of your personal information.

We will not disclose confidential information about your business to anyone except where:

- We are permitted to do so by law;
- We have a public duty to disclose the information;
- We need to do so to comply with the requirements, codes or recommendations of any of our regulators;
- It is necessary for the performance of any product or service that we provide to you; or

- We have transferred (or are planning to transfer) any of our rights or obligations to another party.

## 9. RETENTION

All of the data collected and processed will be subject to a retention period of a minimum 6 years from the moment our business relationship with you has terminated. This period is defined to allow us to comply with our additional regulatory and legal requirement.

## 10. YOUR RIGHTS

### 10.1. Data Rectification

You should be aware that at any point, if any of the data provided to us was changed, you have the right to contact us and request for the amendment of your personal data.

### 10.2. Data Portability

If required, you may contact us and request to receive details about the personal information we hold about you.

### 10.3. Contact Details

You can contact us through the below:

**Telephone:** 0203 796 3128

**Email:** [info@ezbob.com](mailto:info@ezbob.com)

### 10.4. Changes to the Use of Personal Data Policy

We may amend this policy from time to time to reflect changes to our information practices. If we make any material changes we will notify you by email (sent to the e-mail address specified in your account) or by means of a notice on this Site prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices. This privacy policy was last updated on **01/05/2018**