

## **1 - Who are we**

If you have been directed to this privacy statement, LC Asset 1 S.à r.l. (referred to as “we”, “us” or “our” in this privacy statement) has an interest in your loan (or your guarantee provided in connection with a loan), legal title to which is held by Everyday Finance Designated Activity Company, which is also the asset manager of your loan (in either capacity “Everyday”).

We take privacy seriously and we are open and transparent about how we handle your personal information and about our obligations under applicable data protection laws and regulations, including the General Data Protection Regulation.

This privacy statement explains the basis on which we will control and process any personal information we have about you in connection with the ownership and/or administration of your loan, that we collect from you or that you may provide to us. We are responsible for any such personal data in our capacity as a data controller or as a data processor, as determined in accordance with applicable data protection legislation.

We have tried to keep this statement as straightforward as possible. However, if you require any further information or clarification then please contact Everyday as follows. They will receive and process any requests, complaints or enquiries about your rights on our behalf:

Everyday Finance Designated Activity Company

16 Briarhill Business Park  
Ballybrit  
Co. Galway  
Ireland

Telephone number: 00 353 (0)91 700010

Email address: [info@everydayfinance.ie](mailto:info@everydayfinance.ie)

## **2 - What information do we collect**

Personal data means any information capable of identifying an individual. It does not include anonymised data.

### Personal Data

We may process the following categories of personal data about you:

- Customer data – this includes data such as names, title, address, phone number, email address, gender, nationality, age, date of birth, financial details and circumstances and employment details.
- Communication data – this includes any communication that you send to us whether that be via email, telephone or any other method.

## Special Category Data

We require your explicit consent for processing special category data (e.g health data). Where relevant, we will send you a further communication asking you to confirm your consent for this processing.

We do not carry out automated decision making or any type of automatic profiling.

### ***3 - How do we collect your data***

We may collect data about you when you provide the data directly to us (for example, by sending us emails or through other forms of correspondence we have with you, such as phone calls).

We may obtain data about you from the previous (or current) owner of your loan.

Third parties that we appoint may collect data from you and pass it on to us.

### ***4 - What do we do with your information***

We may use your information on any of the following lawful grounds:

- a. For the performance of a contract with you; or
- b. For compliance with a legal obligation to which we are subject; or
- c. For the purposes of our legitimate interests, except where such interests are overridden by your interests or fundamental rights and freedoms.

Our legitimate interests include the following:

- To conduct our business as an entity that has an interest in loans;
- To communicate with you;
- To provide, monitor and improve any service we offer to you;
- To manage and maintain relationships with you and for ongoing customer service;
- For record keeping;
- To generate reports;
- To monitor and record calls for quality, business analysis, training and related purposes in order to improve any service we offer you;
- To protect our legal rights and interests including screening for fraud prevention and anti-money laundering purposes;
- For the establishment, pursuance or defence of complaints, investigations and legal claims;
- To meet our regulatory, legal and/or compliance requirements; and
- To grow our business.

### ***5 - Who do we share your information with***

We may share your information with our employees, directors, shareholders (and to those of our affiliates), financial institutions, investment companies, accountants, lawyers, auditors, insurers, professional advisors, credit reference agencies or other third party service providers who provide services to us. We may also disclose information we have a legal or regulatory right or obligation to

report. Further, we may share your information with third parties to whom we sell, transfer or merge parts of our business or our assets.

It is our commitment that prior to disclosing any personal information about you to another organisation we have taken all reasonable steps to ensure that that organisation will hold and protect your information with adequate security measures and in accordance with relevant regulation.

#### ***6 - How do we keep your information safe***

We protect your information with appropriate security measures under the laws and regulations that apply to prevent your personal data from being accidentally lost, used, altered, disclosed or accessed without authorisation. We confirm our security measures are subject to regular testing and updated as appropriate to the level of data that we hold.

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

#### ***7 - How long do we keep your information for***

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

When deciding what the correct time is for which we should keep the data, we look at its amount, nature and sensitivity, the potential risk of harm from unauthorised use or disclosure, the processing purposes, whether these can be achieved by other means and legal requirements.

For tax purposes, in certain circumstances the law requires us to keep information about customers for six years after they stop being customers.

In some circumstances we may anonymise your personal data for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

#### ***8 - What are your rights regarding your information***

You have explicit rights concerning your personal information and we will ensure that your rights are protected while your data is in our possession. Your rights include the following:

- Right of Access – you may request a copy of all the personal information we hold about you and we will respond within one month. If your request is particularly complex or you have made a number of requests, we may extend this period by a further two calendar months and we shall explain our reasons.
- Right of Deletion – You may wish to have certain data we hold deleted and we will comply with this right where, for example, it is no longer necessary for us to hold the data or if there is no lawful ground for processing.

- Right of Rectification – You have a right to request that any incorrect, inaccurate or incomplete data is updated, corrected and/or completed.
- Right of Restriction – You may wish to restrict us from using your data where, for example, you contest the accuracy of the data.
- Right to Object – You have a right to object to us using your data where processing is carried out for direct marketing or for our legitimate interest. We will no longer process your data unless we can demonstrate compelling legitimate grounds.
- Right to Data Portability – You have a right to request we share your data with another organisation and we will assist with that process where possible.

You will not have to pay a fee to access your personal data (or to access any of your other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive.

Please note that we may ask you to provide us with additional documentation to verify your identity before we action your request. This is to ensure we are dealing with the correct individual and also for Anti-Money Laundering purposes. We will tell you when we ask for your information whether it is a statutory or contractual requirement to give us the information and the consequences of not providing the information.

### ***9 - Making a complaint***

If you wish to make a complaint then you may do so in person, by telephone, in writing and/or by email. Please note that complaints will be dealt with on our behalf according to the Everyday complaints policy and will be fully logged and investigated.

You can also contact your local supervisory authority for data protection issues.

### ***10 - General***

We will not transfer your data to a country outside of the European Economic Area unless that country ensures an adequate level of data protection, has appropriate safeguards in place or relies on one of the derogations provided for under applicable law and regulation.

It is very important that the information we hold about you is accurate and up-to-date. Please let us know if at any time your personal information changes by contacting us via the details set out above.

This privacy statement may be updated by us at any time.

**LC Asset 1 S.à r.l., February 2019**