Important Information Leaflet 



The Financial Conduct Authority (FCA) is the independent regulator of financial services. The FCA requires Toomey Leasing Group Ltd (also collectively referred to as ‘us’ and ‘we’ hereon) and Close Brothers Limited (also collectively referred to as ‘CBL’, ‘them’ and ‘their’ hereon) to provide you with a document called an 'Initial Disclosure Document'.

This document contains important information about us, CBL (who are the finance provider for whom we act as agent), the products we offer, the services we will provide, the services that CBL will provide, who regulates both us, who regulates CBL, and what to do if you have a complaint.

Who are we?

We are Toomey Leasing Group Ltd and our registered office is, Service House, West Mayne, Basildon, Essex SS15 6RW.

We are authorised and regulated by the Financial Conduct Authority as a credit broker, Registration Number: 687548, therefore we can introduce you to lenders who may be able to help you finance your vehicle.

Whose products do we provide?

We act as an agent for Close Brothers Limited, which is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority (firm reference number: 124750). Its registered office address is 10 Crown Place, London, EC2A 4FT.

Close Brothers Limited is permitted to arrange and sell various forms of finance, including regulated personal hire agreements.

You can check the authorisation status of both Toomey Leasing Group Ltd and Close Brothers Limited on the Financial Conduct Authority’s register by visiting their website www.fca.org.uk/register or by contacting them on 0800 111 6768 (freephone) or 0300 500 8082.

What services do we provide?

As an agent, we will provide you with information and quotations relating to Close Brothers Limited (CBL) products. In order to provide you with this service we will pass your personal information to CBL for the purposes of undertaking credit checks and identity checks on you, and/or your business, and/or those with whom you are linked financially. CBL may also share this information with other third parties to protect them and Toomey Leasing Group Ltd against fraud.

If you have a complaint

**Toomey Leasing Group Ltd:**

It is the aim of Toomey Leasing Group Ltd to provide a very high standard of service to every client. It is important to us that all complaints are resolved as quickly as possible and to the complete satisfaction of our clients. You can register a complaint via:

E-Mail: chester@toomeylease.com

Telephone: 01244 572110

Write to: Toomey Leasing Group Ltd, Marlston House

 Bell Meadow Business Park, Park Lane

 Pulford, Chester CH4 9EP

A copy of our complaints procedure is available upon request or on our website, toomeylease.com. If you cannot settle your complaint with us, you may be entitled to refer it to the Financial Ombudsman Service, either by telephone on 0300 123 9123 or 0800 023 4567, through their website at [www.financial-ombudsman.org.uk](http://www.financial-ombudsman.org.uk) or at the address Exchange Tower, London, E14 9SR.

**Close Brothers Limited:**

If you have any complaints in relation to the services provided by Close Brothers Limited please register your complaint via:

Telephone: 0161 888 2818

Write to: Complaints, Close Brothers Limited, Olympic Court, Third Avenue, Trafford Park Village, Manchester, M17 1AP

A copy of CBL’s complaints procedure is available upon request.

If you are not satisfied with CBL’s response, you may be entitled to refer your complaint to the Financial Ombudsman Service, using the contact details above.

Please note that, should you be entitled to refer your complaint, this right will be deemed to be incorporated into any agreement you enter with CBL.

General finance agreement complaints may also be referred to the Finance & Leasing Association, whose contact details are available on request.

 



Cancellation

You are entitled to a cooling off period within the first 14 days of entering into your hire agreement without penalty. Further details will be included within the Terms & Conditions shown on the agreement that you sign or can be requested from your Contact.

Data Protection

Information on how both Toomey Leasing Group and Close Brothers Limited will collect, process and otherwise use your personal data is provided at the end of this Initial Disclosure Document.

Why you have to provide identity and address verification details

Please be aware that Close Brothers Limited is required to verify your identity in accordance with the Proceeds of Crime Act 2002 and the Money Laundering Regulations 2017. If they are unable to do this, they cannot continue to transact business with you.

Close Brothers Limited - General Information

Close Brothers Limited is a proud member of the Finance & Leasing Association (FLA), and abides by the FLA Lending Code which can be found on the FLA website. You can also request a copy by writing to our Head of Operations at: Wimbledon Bridge House, 1 Hartfield Road, London, SW19 3RU.

By acting as an agent for Close Brothers Limited, Toomey Leasing Group may receive commission and/or a fee for introducing business.

This document will need to be amended from time to time. A new Initial Disclosure Document will be given to you when it is required, that is when you commence new business with us or alter your existing agreement.

I hereby confirm that a copy of this Initial Disclosure Document was provided to me when I initially entered into negotiations with Toomey Leasing Group and I have read and understood the contents.

Signature:

Print Name:

Date:

**Close Brothers Limited**

**Data Protection Notice**

**Privacy Notice**

"We", "our" or "us" means Close Brothers Limited and its subsidiaries, affiliates and their respective parent and subsidiary companies (“Close Brothers Group”). For the purposes of data protection law, we are a data controller in respect of your personal data. We collect and use your personal data and where applicable this may include information related to your spouse/partner, directors, partners and owners (your “representatives”). Close Brothersis responsible for ensuring that it uses your personal data in compliance with data protection law.

If you have any questions about this notice, about how we process personal data or about your rights over your personal data, our Data Protection Officer can be contacted at dpo@closebrothers.com or DPO, Close Brothers, 10 Crown Place, London EC2A 4FT.

This notice applies to any personal data we receive from you, create or obtain from other sources and explains how it will be used by us. It is important that you take the time to read this notice so that you understand how we will use your personal data and your rights in relation to your personal data.

**Personal data that we collect about you**

We will collect and use the following personal data about you and your representatives:

**Information you give us**

* This is information about you and your representatives that you give us by filling in forms or by corresponding with us by telephone, e-mail or otherwise. The information you give us may include your and your representatives’ name, address, e-mail address and telephone number, financial and credit card information, employment history, health information, credit history, identification records, qualifications and vehicle or asset details.
* You must ensure that in respect of any information you provide us with, which does not relate to you (for example, information about your representatives), you have obtained the necessary consent in order to disclose such information and provided the individual to whom the information relates with a copy of this notice.

**Information we collect or generate about you and your representatives**

* Website Usage Information – Our website uses Google Analytics to automatically gather certain statistical information such as the number and frequency of visitors and their IP addresses. This information is used as aggregated statistical information about users, providing usage by IP address. This information helps us to measure how individuals use the website and our services, so that we can continually improve them.
* We sometimes record telephone conversations to resolve complaints, improve our service and for training and quality assurance purposes.
* We generate data for statistical analysis.

**Use of Cookies**

***For full details on what cookies are, what they do, and which cookies are used by us, please see our https://www.closebrothers.com/cookies-privacy.***

To enable you to sign in and personalise your online experience we use “cookies”. A cookie is a small text file that is placed on your hard disk by a web page server. Cookies contain information that can later be read by a web server in the domain that issued the cookie to you. Cookies cannot be used to run programs or deliver viruses to your computer. We use cookies to store your preferences and other information on your computer in order to save you time by eliminating the need to repeatedly enter the same information and to display your personalised content and appropriate advertising on your later visits to our website.

**Information we receive from other source**s

* Financial/ Credit Information – We will use information provided by credit reference agencies when assessing your application for finance and to verify your or, if applicable, your representatives identity. Such information may include some details about other credit you have taken out, any credit arrangements you have met or failed to meet, and any court judgments made against you.
* Fraud Prevention Agencies – When verifying your identity as part of our application process, we may access information recorded by fraud prevention agencies within and outside the UK. This may include information about any criminal convictions and any allegations regarding criminal activity that relate to you.
* Intermediaries – We will receive information from dealers, brokers and introducers including your personal details, contact details and relevant asset or policy details for the purposes of entering in to and administering your agreement.
* Social Media Profile – Where you have clicked through one of our promotions or event notices posted on a third party social media website such as LinkedIn, we will receive your contact information provided as part of your user profile such as your name, e-mail address and telephone number and any other relevant business information such as your organisation’s name, address and your industry. Some of this information may be prepopulated based on your social media profile; other parts may be completed by you, as and when requested.
* Public databases – we may obtain information about individuals from public databases. We use reputable sources including but not limited to Companies House. We employ appropriate measures to assure the quality of information which we collect.

**How we use your personal data**

Your personal data may be used by us in the following ways:

* **Credit Scoring & Crime Prevention**
* to verify your identity as part of the account opening process for new customers;
* for making a credit check on you. We may carry out a search with a credit reference agency who will keep a record of our enquiry against your name and which may be linked to your representatives (“associated records”). For the purposes of any application for products or services from us, you may be assessed with reference to “associated records”. Where any search or application is completed or agreement entered into involving joint parties, we may record details at credit reference agencies, as a result an “association” will be created that will link your financial records. Details of which credit reference agency we have used are available on request. We may also add to your or, if applicable, your business’s, record with the credit reference agencies details of your agreement with us, any payments you make under it and any default or failure to keep to its terms. These records will remain on the credit reference agencies’ files for 6 years after our agreement with you is settled or terminated whether settled by you or, if applicable, your business or by way of default. These credit reference agencies may create, or add to, their own record about you, or, if applicable, your business, details of our search and your application. This and other information about you or, if applicable, your business and those with whom you are linked financially may be used to make credit decisions about you or your business;
* [You can find further information about how credit reference agencies (CallCredit, Equifax and Experian) may process your personal data at www.experian.co.uk/crain or you can contact us to obtain a paper copy of this information;]
* we may use credit scoring techniques and automated decision making systems to either fully or partially assess your information. These credit scoring techniques and automated decision making systems may take into account any previous applications for finance, defaults or existing debt. The results of this decision may decide whether we provide you with our services or not. If you disagree with the results of an automated decision, you can request a review of your application;
* to allow us to detect and prevent fraudulent activity including sharing personal data with fraud prevention agencies; and
* to allow us to detect and prevent money laundering activity or terrorist financing.
* **Products & Services**
* to provide you with information, products or services that you may request from us;
* to carry out our obligations arising from any agreements you enter into with us;
* to make payments;
* to recover monies;
* where we are permitted to do so, to send promotional information about our products and services via methods such as e-mail, post, telephone, etc.; and
* to contact you via post, e-mail or telephone in relation to the administration of your account or to carry out quality control research.
* **Statistical Analysis**
* as part of our legal and regulatory obligations, to conduct statistical analysis in order to improve our credit risk profile, tackle fraud, and improve our credit decisions. This may include statistical analysis on your personal data even if your application is declined by us or you decide not to complete your application with us; and
* in order to identify and offer you tailored products and services that are suitable for you and improve our service.

**Legal basis for processing your personal data**

We process your personal data pursuant to the following legal bases:

* your consent to share your personal data with third party affiliates who may wish to offer you products and services which may be of interest to you;
* taking steps (at your request) prior to entering into an agreement with you, and subsequently for the administration and performance of our agreement with you;
* to comply with our legal and regulatory obligations;
* to establish, exercise or defend our legal rights and / or for the purpose of (or in connection with) legal proceedings; and
* the use of your personal data as described is necessary for our legitimate business interests which are:
	+ enforcing the terms and conditions of any agreement we have with you;
	+ the recovery of outstanding debts existing under an agreement with you;
	+ for statistical analysis to improve our products and services; or
	+ to contact you about products and services that may be of interest to you. You may object to this at any time by contacting us at [e-mail] or by calling [phone] or by mail addressed to [insert address].

**Sharing your personal data**

We may disclose your personal data within the Close Brothers Group and to third party service providers in the circumstances described below:

* to ensure the delivery or maintenance of products or services you have taken out with us;
* to ensure the safety and security of our data; and
* as part of our internal research and statistical analysis activity.

We will take steps to ensure that the personal data is accessed only by personnel that have a need to do so for the purposes described in this notice.

We may also share your personal data outside of the Close BrothersGroup:

* to our professional advisers in order to enforce or apply the terms of use and other agreements you have with us;
* to an insurer or insurers for administration;
* to claims handlers and fraud prevention agencies;
* to any guarantor;
* to any funder in order to enable funders to assess the value of our assets;
* to any broker or introducer of an agreement with us;
* to tracing and repossession agents;
* if we sell any of our business or assets, in which case we may disclose your personal data to the prospective buyer for due diligence purposes;
* if we are acquired by a third party, in which case personal data held by us about you will be disclosed to the third party buyer;
* to third party agents or contractors (for example, the providers of our electronic data storage services or call centres) for the purposes of providing services to us; and
* with your consent, to third party affiliates who may wish to offer you products and services which may be of interest to you.

These third parties will be subject to confidentiality requirements and they will only use your personal data as described in this privacy notice.

We may also share your personal data outside of the Close Brothers Group to the extent required by law, for example if we are under a duty to disclose your personal data in order to comply with any legal obligation including but not limited to disclosures made to:

* Credit agencies;
* Companies House;

and to establish, exercise or defend our legal rights.

**Transfer of personal data outside the European Economic Area**

The information you provide to us will be transferred to and stored on our secure servers in the European Economic Area (“**EEA**”). However, from time to time, your personal data may be transferred to, stored in, or accessed from a destination outside the EEA. It may also be processed by staff operating outside of the EEA who work for a company in the Close Brothers Group or for one of our suppliers.

Where we transfer your personal data outside the EEA, we will ensure that it is protected in a manner that is consistent with how your personal data will be protected by us in the EEA. This can be done in a number of ways, for instance:

* the country that we send the data to might be approved by the European Commission or a relevant data protection authority;
* the recipient might have signed up to a contract based on “model contractual clauses” approved by the European Commission, obliging them to protect your personal data; or
* where the recipient is located in the US, it might be a certified member of the EU-US Privacy Shield scheme.

In other circumstances the law may permit us to otherwise transfer your personal data outside the EEA. In all cases, however, we will ensure that any transfer of your personal data is compliant with data protection law.

You can obtain more details of the protection given to your personal data when it is transferred outside the EEA (including a copy of the standard data protection clauses which we have entered into with recipients of your personal data) by contacting us in accordance with the “Contact us” section below.

**How long we keep your personal data**

How long we hold your personal data for will vary. The retention period will be determined by various criteria including:

* the purpose for which we are using it – we will need to keep the data for as long as is necessary for that purpose; and
* legal obligations – laws or regulation may set a minimum period for which we have to store your personal data.

If you are a customer we will retain your personal data for 7 years following the end of our relationship with you, unless we are required by law to keep it for a longer period of time (in which case, we will keep it until the expiry of the period required by law).

**Your rights**

You have a number of rights in relation to the personal data that we hold about you. These rights include:

* the right to object to our processing of your personal data where we process your personal data pursuant to our legitimate business interests. Please note that there may be circumstances where you object to our processing of your personal data but may be legally entitled to refuse that request;
* the right to obtain information regarding the processing of your personal data and access to the personal data which we hold about you;
* the right to withdraw your consent to our processing of your personal data at any time. Please note, however, that we may still be entitled to process your personal data if we have another legitimate reason (other than consent) for doing so;
* in some circumstances, the right to receive some personal data in a structured, commonly used and machine-readable format and/or request that we transmit those data to a third party where this is technically feasible. Please note that this right only applies to personal data which you have provided to us;
* the right to request that we rectify your personal data if it is inaccurate or incomplete;
* the right to request that we erase your personal data in certain circumstances. Please note that there may be circumstances where you ask us to erase your personal data but we are legally entitled to retain it;
* the right to request that we restrict our processing of your personal data in certain circumstances. Please note that there may be circumstances where you ask us to restrict our processing of your personal data but we are legally entitled to refuse that request;
* the right to object to any automated decision making (including profiling) which we conduct based on your personal data, which significantly affects you. Please note that there may be circumstances where you object to us conducting automated decision making but we are legally entitled to refuse that request;
* the right to object to the processing of your personal data for direct marketing purposes; and
* the right to lodge a complaint with the data protection regulator (details of which are provided below) if you think that any of your rights have been infringed by us.

You can exercise your rights by contacting us using the details set out in the “Contacting us” section below.

[You can find out more information about your rights by contacting the data protection regulator, the Information Commissioner, or by searching their website at <https://ico.org.uk/>.]

**Changes to our privacy policy**

We keep our privacy policy under regular review. Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

**Contact us**

We are registered in the UK and our registered address is at 10 Crown Place, London, EC2A 4FT and our company registration number is 00195626.

Please contact us if you have any questions about our privacy policy or personal data we hold about you:

Write to us at our address: Olympic Court, Third Avenue, Trafford Park, Manchester, M17 1AP

By telephone: 01618882818

By e-mail: pch.support@closebrothers.com

**Toomey Leasing Group – Privacy Policy**

**Privacy Policy**

1. **Introduction**

This is the Privacy Policy of Toomey Leasing Group Limited of Service House, West Mayne, Basildon, Essex SS15 6RW.

This policy sets out the basis on which any personal data we collect from you (or others provide to us), will be processed by us and shared with third parties. Please read the terms of this Privacy Policy carefully.

We have put in place a number of measures to ensure that any personal data we obtain from you is processed and maintained in accordance with legal requirements and the accepted principles of good information handling in accordance with the Data Protection Act 2018 (the “DPA”) and the General Data Protection Regulations (“GDPR”).

The Data Controller is Laindon Holdings Limited. We determine the purposes for which and the manner in which your personal data will be processed.

1. **Who does this Privacy Policy apply to?**

This Policy applies to customers who seek leasing or other finance facilities from us (either where we act as a direct funder or where we broker deals to other funders). It covers how we process personal data in connection with the initial finance application and then our ongoing management and servicing of the account. As well as individuals, “customers” will also include partnerships, unincorporated and incorporated bodies (including limited companies and limited liability partnerships). This policy also applies to guarantors.

Although in general the legal requirements apply to the handling of personal data in relation to individuals, we also seek to apply the same standards of good information handling in respect of all customers.

Where there are two or more persons named in the finance agreement or guarantee, this Policy applies to each of them separately.

1. **What is personal data?**

This is any information that either alone, or in combination with other information, would identify a person as a living individual (for example, your name and date of birth).

1. **Data security**

We take the security of all the data we hold seriously. Relevant staff are trained on data protection, confidentiality and security.

We have a framework of policies and procedures which ensure we regularly review the appropriateness of the measures we have in place to keep the data we hold secure.

All information you provide to us is stored on our secure servers.

Unfortunately, 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 site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

1. **How we collect your personal information**

We may as a result of your interaction with our website and when you apply for finance, process and store your information on our computer systems and our manual files. We will also collect and store personal and financial information about you:

* when you or an introducer (such as a dealer or broker) provide us with information over the telephone or by email
* when you or an introducer sends us documents (which may be in paper form or electronic)
* when we access information held by credit reference, fraud prevention and business information agencies about you
* when we communicate with you during our servicing of your lease or other agreement with us.

We will collect the data shown below, whether or not you become a customer in connection with your application. If you become a customer we will use it to manage and service your account.

1. **The types of data we collect and use**

The type of data we collect and the reasons why include the following:

* **Credit Assessment.** We collect personal and financial information from you and from credit reference agencies (CRAs) and fraud prevention agencies to help us carry out identity checks. We will also use the information to assess your ability to meet your financial commitments and to check that you are creditworthy. Where you will act as a personal guarantor we will assess your financial suitability to do so.

For individuals, the information we collect includes your current and recent addresses, whether you are on the electoral roll, your age, e-mail address and telephone number, whether you are a home owner or tenant, personal data about bank accounts, credit cards, mortgages and other agreements that involve a credit arrangement like utilities and communications contracts (including mobile and internet) and how you are meeting your payments obligations to these organisations and whether you have any court judgments

We may also collect information about a business you own or are involved with including requesting financial records, such as accounts and information held by public bodies such as Companies House. Similar information will also be collected where you are an incorporated body and may include your registered office, business addresses and contacts details, bank details, VAT number, number of employees, business history and information obtained from credit information providers about your financial performance and credit standing.

* **Prevention and detection of crime**: We are obliged to collect personal and financial information from you and from CRAs, fraud prevention agencies and public or government bodies to help us to detect and prevent crime and fraud and to verify your identity (or in the case of a company, its beneficial owners) under our anti-money laundering obligations.
* **Servicing of your facility**: The information we collect will enable us to communicate with you about your finance facility and to service your account, for example to issue statements, to process your payments onto our systems, to contact you about any missing payments and to trace you. We will make a record of our communications with you and your account activity to help us to monitor and manage your account, check that we are providing an adequate service and to help us to deal with any complaints. We will collect information about your bank account to enable us to process your rental or finance payments.
* **Improve our services and products**: We will use your information, for research, assessment and analysis (including market and product analysis) and to develop and improve our services to you and other customers.
1. **The legal basis for processing your personal data**

The UK’s data protection law allows us to process your personal data where we have a proper reason for doing so. This includes to fulfil a contract we have with you, where it is in our legitimate interest, where we have a legal duty and when you consent to it.

1. We rely on the legitimate interests’ basis in respect of our credit assessment activities described above. We will also share your data with credit reference and fraud prevention agencies. A legitimate interest is when we have a business or commercial reason to use your information and where this does not conflict with your data rights.
2. We rely on the contract performance basis in order to take steps to enter into a lease or finance agreement with you, to service your facility and to enforce our rights and remedies under those agreements.
3. We rely on the legal duty for processing by collecting information in order to prevent and detect crime and by sharing data with fraud prevention and government agencies and authorities. We will also collect information necessary for us to maintain records as required by government and regulatory bodies.
4. We will rely on your consent where
	* you ask us to disclose your information to others
	* we process any special categories of personal data at your request where you are an individual (for example about your racial or ethnic origin or concerning your ethnic or racial origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning health, sex life or sexual orientation) and
	* To send you marketing communications (see below).
5. **Marketing**

We may from time to time give you details of products or services which are similar to the ones you have recently taken out with us. We will only do this if we consider this to be a legitimate business interest of ours or in the case of electronic marketing, with your prior consent. If we do send you marketing communications you may ask us to stop sending these messages at any time.

1. **Disclosure of your personal information**

We may give information about you and how you manage your account to the following organisations. Where we do so we will take reasonable steps to ensure that your rights are protected and that they will keep the information confidential:

1. People who provide a service to us or are acting as our agents. This includes any organisation where we have decided to outsource all or part of the administration or servicing of your facility including in respect of data storage, direct debit processing and to debt collecting, tracing and asset recovery agents;
2. To the manufacturers or suppliers of the goods in connection with any repairs or maintenance of the goods.
3. Our insurers, auditors and accountants, solicitors, consultants and other professional advisers;
4. Anyone to whom we transfer or may transfer our rights and duties under your finance agreement (for example if we were to sell your agreement to another finance company);
5. Any funders or investors (or prospective funders or investors) of our business (including other leasing and finance companies where we act as a broker);
6. To credit reference agencies and fraud prevention agencies (see below in section 9);
7. We may also give out personal information about you if we have a duty to do so in order to comply with any legal obligation (such as to Government agencies or regulators).

We occasionally send customer data outside of the UK as some of our software providers are based in the United States of America. However, in the event that we were to send data to an organisation located outside of the European Economic Area we will make sure that they agree to apply the same levels of protection as we are required to apply to information held in the UK and to use your information only for the purpose of providing the service to us.

**Credit Reference Agencies**

In order to assess a finance application, we will carry out credit and identity checks on you with one or more CRAs. When CRAs receive a search from us they will place a search footprint on your credit file (this does not usually happen in respect of guarantors) which may be seen by other lenders and funders. The CRAs also supply to us both public (including the electoral register) and shared credit and fraud prevention information.

We and other organisations may also access and use CRA information to:

1. assess your credit worthiness and whether you can afford the rental or credit repayments (and are suitable to act as a guarantor for such payments);
2. verify the accuracy of the data provided to us;
3. prevent criminal activity, fraud and money laundering;
4. manage the accounts; and
5. trace and recover debts

If you tell us that you have a spouse or financial associate, we will link your records together so you must be sure that you have their agreement to disclose information about them. CRAs also link your records together and these links will remain on your and their files until such time as you or your partner successfully files for a disassociation with the CRAs to break that link.

Information relating to your applications will be shared by us and sent to CRAs and will be recorded by them. We will give them details of your account and how you manage it. We will continue to exchange information about you with CRAs while you have a relationship with us. If you do not repay in full and on time, CRAs will record the outstanding debt and that you have defaulted. This information may be supplied to other organisations by CRAs to perform similar checks. Records remain on file for six years after they are closed, whether settled by you or defaulted. We will also notify the CRAs when you settle your account.

Further information about 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 in more detail at:

* www.callcredit.co.uk/crain
* www.equifax.co.uk/crain
* www.experian.co.uk/crain

The CRA we normally use is Equifax and their details are Equifax plc, Credit File Advice Centre, PO Box 3001, Bradford, BD1 5US or call 0870 010 0583 or visit [www.myequifax.co.uk](http://www.myequifax.co.uk)]

1. **Retention of your personal information**

The length of time we retain your information will depend on the purpose for which the information was provided. In general, however:

1. We will keep the information that is necessary to enable us to manage your account and provide you with a service that you have requested for as long as it takes us to provide that service.
2. We will keep your contact details to send you marketing information, unless you specifically opt out
3. We will keep records of your account history for a period that will not usually exceed six years after your lease agreement has ended. This is to allow us to respond to any complaints or disputes that may arise during that period.
4. We will keep other information about you if it is necessary for us to do so to comply with the law or regulatory requirements.
5. **Access to your information and your other rights**

The rights set out in this section are set out in the GDPR and apply to individuals. We will however seek to apply the same standards to incorporated bodies.

You have the right to request a copy of the information that we hold about you (sometimes called a “subject access request”). If you would like a copy of some or all of your personal information, please email or write to us at our above address. This is free of charge although we can charge a reasonable fee if your request is excessive or repetitive.

You also have the following rights. In most cases we generally must respond within a month. We will inform you if it will take longer than one month.

* You may ask us to rectify your information if you think is inaccurate.
* You are entitled to request that the personal data we hold about you is deleted if you can show that the data (or some of it) is no longer necessary in relation to the purpose for which it was originally collected or processed by us. This is because it has been obtained in order to provide finance to you and to service and maintain your account and therefore we would usually have a legitimate interest in retaining it. There may also be legal or regulatory reasons why we need to continue to retain it.
* In certain circumstances you have the right to restrict and/or object to certain processing if it meets legal requirements.
* Where we rely on your consent to process your personal data, you may withdraw your consent at any time. However, we may continue to process your personal data if we have other legitimate or lawful reasons to do so. If you withdraw your consent, we may not be able to provide our products and services to you. If this is the case, we will tell you.
* You have the right to ask us not to use your information for marketing purposes and to stop sending marketing communications.
* You have the right to ask for your data to be provided in a simple electronic format that can be transferred to another provider if you wish to move your leasing arrangement with us.
1. **Complaints**

You have a right to complain to us if you are dissatisfied in the way that we have handled your personal data. You may contact us using the contact details listed below in Section13 “Contacting us” for details of our complaints policy. If you are an individual, you also have a right to complain to the Information Commissioner’s Office if you are unhappy with the way we handle your data. Their details are Customer Contact, Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF, telephone 0303 123 1113 or email casework@ico.org.uk. You can also download and complete a complaint form by following the link at https://ico.org.uk/concerns/

1. **Contacting us**

You may contact us with any questions you may have regarding our privacy policy and if you want information about your rights. Please contact us using the following details:

Privacy Policy Enquires

Toomey Leasing Group Limited

Service House

West Mayne

Basildon

Essex

SS15 6RW

1. **Changes to our Privacy Policy**

We keep our privacy policy under regular review and we will place any updates on our website. This privacy policy was last updated on 07th June 2018.