

Fair Processing Notice for the purposes of Fraud prevention and Detection

Cifas is the data controller of the Cifas National Fraud Database and therefore has legal obligations under data protection legislation.

Cifas are the UK's leading fraud prevention service, managing the largest confirmed fraud database in the country. Creation Consumer Finance & Creation Financial Services are members of Cifas for the purposes of preventing fraud and fraud detection. For more information on CIFAS please go to <https://www.cifas.org.uk>.

Before Creation Consumer Finance/Creation Financial Services provide services, goods or financing to you, we undertake checks with Cifas for the purposes of preventing fraud and money laundering, and to verify your identity. These checks require us to process personal data about you.

The personal data you have provided, we have collected from you, or we have received from third parties will be used to prevent fraud and money laundering, and to verify your identity.

Details of the personal information that will be processed, for example:

- name,
- address,
- date of birth,
- contact details,
- financial information,
- employment details,
- device identifiers including IP address and vehicle details.

We and fraud prevention agencies may also enable law enforcement agencies to access and use your personal data to detect, investigate and prevent crime.

We process your personal data on the basis that we have a legitimate interest in preventing fraud and money laundering, and to verify identity, in order to protect our business and to comply with laws that apply to us. Such processing is also a contractual requirement of the services or financing you have requested.

Fraud prevention agencies can hold your personal data for different periods of time, and if you are considered to pose a fraud or money laundering risk, your data can be held for up to six years.

AUTOMATED DECISIONS

As part of the processing of your personal data, decisions may be made by automated means. This means we may automatically decide that you pose a fraud or money laundering risk or if

our processing reveals your behaviour to be consistent with that of known fraudsters or money launderers; or is inconsistent with your previous submissions; or you appear to have deliberately hidden your true identity. You have rights in relation to automated decision making: if you want to know more please contact us by email at customerenquiries@creation.co.uk or write to us at Creation Financial Services Limited, Chadwick House, Blenheim Court, Solihull, B91 2AA.

CONSEQUENCES OF PROCESSING

If we, or a fraud prevention agency, determine that you pose a fraud or money laundering risk, we may refuse to provide the services and financing you have requested, or to employ you, or we may stop providing existing services to you.

A record of any fraud or money laundering risk will be retained by the fraud prevention agencies, and may result in others refusing to provide services, financing or employment to you. If you have any questions about this, please contact us by email at customerenquiries@creation.co.uk or write to us at Creation Financial Services Limited, Chadwick House, Blenheim Court, Solihull, B91 2AA.

DATA TRANSFERS

Whenever fraud prevention agencies transfer your personal data outside of the European Economic Area, they impose contractual obligations on the recipients of that data to protect your personal data to the standard required in the European Economic Area. They may also require the recipient to subscribe to 'international frameworks' intended to enable secure data sharing.

YOUR RIGHTS

Your personal data is protected by legal rights, which include your rights to object to our processing of your personal data; request that your personal data is erased or corrected; request access to your personal data.

For more information or to exercise your data protection rights, please visit our website at www.creation.co.uk/data-subject-access-request

You also have a right to complain to the Information Commissioner's Office which regulates the processing of personal data.

This Fair Processing Notice was reviewed on 5th October 2018.