

## **The Use of Your Personal and Business Information by Dell Bank International d.a.c.**

### **Section A: Credit Reference Agencies and Fraud Prevention Agencies**

#### **1. What is a Credit Reference Agency?**

Credit Reference Agencies (“CRA”) collect and maintain information on consumers’ and businesses’ credit behaviour on behalf of other organisations.

#### **2. What is a Fraud Prevention Agency?**

Fraud Prevention Agencies (“FPA”) collect, maintain and share information on known and suspected fraudulent activity. Some CRAs also act as FPAs.

#### **3. Why do you use CRAs and FPAs when I have applied to your organisation?**

Although you have applied to us at Dell Bank International d.a.c., and we will check our own records, we will also contact CRAs to get information on your credit behaviour with other organisations. This will help us make the best possible assessment of your overall situation before we make a decision.

#### **4. Where do CRAs and FPAs get the information?**

- Credit information comes from information on applications to banks, building societies, credit card companies, etc.... and also from the conduct of those accounts;
- Fraud information may come from fraud prevention agencies;
- Company information and information about directors and shareholders comes from the companies office register and/or other publicly available directories or proprietary directories at CRAs;
- Information may also be obtained from public sources e.g. bankruptcy/insolvency registers.

#### **5. Why is my data used in this way?**

We and other organisations want to make the best possible decisions we can in order to make sure that you or your business will be able to repay us. Some organisations may also use the information to check your identity. In this way, we can ensure that we all make responsible decisions. At the same time we also want to make decisions quickly and easily and by using up- to-date information, provided electronically, we are able to make the most reliable and fair decisions possible.

#### **6. Who controls what such agencies are allowed to do with my data?**

All organisations that collect and process personal data are regulated by the applicable data protection legislation.

#### **7. Can just anyone look at my data held at Credit Reference Agency?**

No – access to your information is very strictly controlled and only those that are entitled to do so may see it. Usually, that will only be with your agreement or (very occasionally) if there is a legal requirement.

The following section will tell you how, when and why we will search at CRAs and FPAs and what we will do with the information we obtain from them. We will also tell you if we plan to send payment history information on you or your business to CRAs.

You can ask us at any time for the name of the CRAs and FPAs we use.

**Section B: What Dell Bank International d.a.c. does with you information:**

**When you apply to us for financing we may:**

- (a) Check our own records for information on:
  - (i) your business accounts; or
  - (ii) shareholders of your business; or
  - (iii) your and your business partners' (if you have one/any) personal accounts.
  
- (b) Search at Credit Reference Agencies for information on:
  - (i) public data on your and your business partners' personal credit behaviour;
  - (ii) information on the conduct of your and your business partners' personal credit accounts if you are proprietors of small business;
  - (ii) your business;
  - (iii) your business accounts;
  - (iv) information on the identity of the beneficial owners of the business;
  - (v) If you have one, we may also check the personal accounts of your personal financial partner(s)\*. **Therefore, you must tell them that this may happen.** We will send a notification to them to this effect.
  - (vi) If you are a director, we will seek confirmation from Credit Reference Agencies that the residential address that you provide is the same as that shown on the register of director's usual addresses at the companies office.

( \* A financial partner or associate will be someone with whom you have a personal relationship that creates a joint financial unit in a similar way to a married couple. You will have been living at the same address at the time. It is not intended to include temporary arrangements such as students or rented flat sharers or business relationships).

- (c) Search at Fraud Prevention Agencies for information on your business, you, your personal financial partner, your business partners, beneficial owners and your address(es).

**What we do with the information you supply to us as part of the application:**

- (a) Information that is supplied to us will be sent to the Credit Reference Agencies.
- (b) If you give us false or inaccurate information and we suspect or identify fraud, we will record this and may also pass this information to Fraud Prevention Agencies and other organisations involved in crime and fraud prevention.
- (c) Your data may also be used by us to offer your business or other products, but only if permitted.
- (d) Record information at Credit Reference Agencies about your application, your business, you and your business partners.
- (e) If you provide information about shareholders we will record this information at Credit Reference Agencies. **Therefore you must have the agreement of your business partners and shareholders to disclose information about them.**

**With the information that we obtain we will:**

- (a) Assess your application for credit and/or;

- (b) Check details on applications for credit and credit related or other facilities;
- (c) Verify your identity and the identity of other directors, business partners and shareholders;
- (d) Undertake checks for the prevention and detection of crime or fraud and/or money laundering;
- (e) We may use scoring methods to assess your application and to verify your identity;
- (f) Manage your personal and/or business account with us;
- (g) Undertake periodic statistical analysis or testing to ensure the accuracy of existing and future products and services;
- (h) Any or all of these processes may be automated.

**What we do when you have an account:**

- (a) Where you apply for financing from us, we will give details of your business account to Credit Reference Agencies, including the names and parties to the account and how you manage it
- (b) If you obtain financing from us and you do not make your repayments in full and on time, we will tell Credit Reference Agencies.
- (c) We may make periodic searches of our own group records and Credit Reference Agencies to manage your account with us, including whether to continue or extend existing credit. We may also check at Fraud Prevention Agencies to prevent or detect fraud.
- (d) If you obtain financing from us and do not make payments that you owe us, we will trace your whereabouts and recover payment.

**Section C: What Credit Reference Agencies and Fraud Prevention Agencies do:**

When Credit Reference Agencies receive a search from us they will:

- (a) Place a credit search “footprint” on your company/business credit file whether or not this application proceeds. If the search was for a credit application, the record of that search (but not the name of the organisation that carried it out) may be seen by other organisations when your business applies for credit in the future.
- (b) Place an enquiry search on the personal credit files of any director, owner or partner that have been searched. Place an associate enquiry search on your personal financial partner’s credit file, if that is checked. These enquiry searches will not be seen by other organisations if any director, owner or partner applies for credit in the future.
- (c) Link together the previous and subsequent names advised by you of anyone that is party to the account.
- (d) Place an enquiry or identification search on the record of any shareholder who is a beneficial owner and who we have checked.
- (e) Create a record of the name and address of your business and its proprietors, if there is not one already.

**Credit Reference Agencies will supply to us:**

- (a) Information about your business or company such as previous applications for credit and the conduct of accounts and also similar personal credit information in your name, your personal partner's name and the name of your business partners.
- (b) Public information such as bankruptcies or Court judgments.
- (c) Electoral register information on you and your business partners.
- (d) Fraud prevention information.
- (e) Confirmations or otherwise that the usual residential addresses supplied by directors match those on the register held at the companies office.

**When information is supplied by us to them on your account(s):**

- (a) Credit Reference Agencies will record the details that are supplied on your business and business account – including previous and subsequent names of parties to the account and how you manage it/them.
- (b) If your business obtains financing from us or does not repay in full and on time, Credit Reference Agencies will record the outstanding debt.
- (c) Records shared with Credit Reference Agencies remain on file for a period of time after they are closed whether settled by your or defaulted for a time period set by the relevant Credit Reference Agency.
- (d) Information on shareholders who are beneficial owners will be used and supplied to others only
  - (i) for the purpose of the performance of identity checks;
  - (ii) with their specific consent.

**Section D: Use of your data by Credit Reference Agencies:**

**How your data will NOT be used by Credit Reference Agencies:**

- (a) It will **not** be used to create a blacklist.
- (b) It will **not** be used by the Credit Reference Agency to make a decision.

**How your data WILL be used by Credit Reference Agencies:**

The information which we and other organisations provide to the Credit Reference Agencies about you, your business partners and details about your business may be supplied by Fraud Prevention Agencies to other organisations and used by them and us to:

- (a) Prevent crime, fraud and money laundering by, for example checking details provided on applications for credit and credit related or other facilities;
- (b) Check the operation of credit and credit-related accounts;
- (c) Verify your identity if you or your business partner(s) applies for other facilities;
- (d) Make decisions on credit and credit related services about you and/or your business partner, or your business;
- (e) Manage your personal, your business partner's and/or business credit or credit related account(s).

- (f) Trace your whereabouts and recover debts that you owe;
- (g) Undertake statistical analysis and system testing.

**Section E: Use of your data by Fraud Prevention Agencies:**

**How your data may be used by Fraud Prevention Agencies:**

- (a) The information which we provide to the fraud prevention agencies about you, your business partners and your business may be supplied by Fraud Prevention Agencies to other organisations and used by them and us:
  - (i) to prevent crime;
  - (ii) fraud and money laundering by, for example:
    - checking details provided on applications for credit and credit related or other facilities; ;
    - managing credit and credit related accounts or facilities;
    - cross checking details provided on proposals and claims for all types of insurance;
    - checking details on applications for jobs or when checked as part of employment.
- (b) Verify your identity if you or your business partner(s) applies for other facilities including all types of insurance proposals and claims.
- (c) Trace your whereabouts and recover debts that you owe.
- (d) Conduct other checks to prevent or detect fraud
- (e) Organisations may access and use from other countries the information recorded by Fraud Prevention Agencies.
- (f) Undertake statistical analysis and system testing.
- (g) Your data may also be used for 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 applicable data protection legislation.
- (h) Your data may also be used to offer you other products, but only if permitted.

**Section F: How to find out more:**

Please contact us by email at [DFSOriginations\\_UKl@dell.com](mailto:DFSOriginations_UKl@dell.com) if you wish to receive details of the Credit Reference Agencies or the Fraud Prevention Agencies.