

## **DATA PROTECTION STATEMENT - DIRECT MARKETING**

This statement explains how Dell Bank International d.a.c., trading as Dell Financial Services ("**Dell Bank**" "**we**" or "**us**" or "**our**") may use your Personal Data for direct marketing purposes.

"Personal Data" means information that may directly or indirectly identify you, such as your name, role/position within your organisation, telephone number and email address.

We primarily collect and process information relating to the business activities of the organisation that you work for or represent in connection with financial services that we provide to your organisation. We may also receive your Personal Data from other companies within the Dell Technologies Group. As part of providing financing, we are required to collect and process certain information relating to individuals connected to the organisation (such as employees, officers, directors and owners). This is when we may collect the information that we hold about you and process it in accordance with this statement.

We are the "controller" of any Personal Data that we process— this means we are legally responsible for ensuring such processing is in compliance with applicable privacy laws.

### ***What is direct marketing?***

Direct marketing is a direct and targeted form of marketing is where we provide promotional messages, or marketing communications about our products and services directly to a specific individual(s). This is different to general marketing e.g. on television, radio, online or in a newspaper.

### ***What direct marketing might you receive from Dell Financial Services?***

We may send you information as part of your role within the organisation you work for or represent. The direct marketing that we may send to you includes information regarding our existing or new financial products, solutions, offers, services or events. We may send these communications to you by email, telephone or post. Some of our communications may be tailored based on your or your organisation's previous activities with us or with the Dell Technologies group.

Please be aware that the consent you provide us relates solely to direct marketing which you may receive from us.

### ***Who we may share your Personal Data with and why***

We may share your Personal Data with other entities within the Dell Technologies group or service providers solely for the purpose of sending you these direct marketing communications.

We may also disclose your Personal Data as required by law or regulation.

Except as described above, we will not disclose your Personal Data to third parties for their own marketing purposes without your consent.

### ***International transfers***

In order to use, disclose and process Personal Data for the purposes and to the recipients described above, we may transfer your Personal Data to countries outside the European Economic Area (EEA) to companies, business partners or service providers of the Dell Technologies group (including, without limitation) those located in the US, India, Brazil and Morocco, with whom we have appropriate contractual and security safeguards in place. This may involve the transfer of your Personal Data to countries that do not provide the same level of data protection as your home country. We will put in place adequate and appropriate protections to safeguard your Personal Data, including technical and organisational security measures. To find out more about these data transfers or to exercise your rights, please contact us (contact details provided below).

### ***Your data protection rights***

You have the following data subject rights. Please note, these rights are not absolute and in certain cases are subject to conditions set out in applicable law:

- **Access:** you have the right to request information about how we process your Personal Data and to obtain a copy of that Personal Data.
- **Rectification:** you have the right to request the rectification of inaccurate Personal Data about you and for any incomplete Personal Data about you to be completed
- **Objection:** you have the right to object to the processing of your Personal Data, which is based on our legitimate interests (as described above)
- **Erasure:** you have the right to request the erasure of your Personal Data (subject to certain conditions)
- **Automated decision-making:** you have the right not to have a decision made about you that is based solely on automated processing if that decision produces legal effects about you or significantly affects you
- **Restriction:** you have the right to ask us to restrict our processing of your Personal Data, so that we no longer process that information until the restriction is lifted
- **Portability:** you have the right to receive your Personal Data, which you have provided to us, in a structured, commonly used and machine-readable format and to have that information transmitted to another organisation in certain circumstances.

In addition to the above, you have the right to lodge a complaint with a supervisory authority if you consider that our processing of your Personal Data infringes applicable data protection law.

If you have any questions about the type of Personal Data we hold about you or if you wish to request deletion or correction of Personal Data we hold about you, or exercise any other data subject right, please send a written request to [dfs\\_emea\\_privacy@dell.com](mailto:dfs_emea_privacy@dell.com) or to the postal address provided at the bottom of this statement. While we will make reasonable efforts to accommodate your request, we reserve the right to reject such access requests or to impose restrictions or requirements upon such requests if required or permitted by applicable law.

### ***Legal basis for the processing of your Personal Data***

We collect and process your Personal Data on the basis of your consent, which you are free to withdraw at any time by sending an email to [Dell\\_Financial\\_Services\\_Unsubscribe@dell.com](mailto:Dell_Financial_Services_Unsubscribe@dell.com).

If you withdraw your consent, it will not affect the lawfulness of any processing based on your consent before you withdrew it.

### ***How we secure your Personal Data***

We take all reasonable steps to protect your Personal Data from misuse, interference and loss, as well as unauthorised access, modification or disclosure.

The ways we do this include:

- having in place technical and organisational measures designed to ensure the ongoing integrity, availability and resilience of processing systems and services;
- limiting physical access to our premises;
- ensuring that we and those to whom we may transfer your Personal Data have appropriate security safeguards to keep Personal Data secure; and
- where required by law, destroying or de-identifying Personal Data.

***How long will we hold your Personal Data for?***

We will hold your Personal Data for as long as necessary in connection with the purposes described in this Direct Marketing Policy or in accordance with our retention policy and applicable law.

You can request further information by writing to us (contact details provided below).

***Changes to this Direct Marketing Statement***

We may occasionally update this statement. If we make changes to this statement or make any material changes to how we use your Personal Data, we will revise this statement to reflect such changes and revise the effective date of this statement, included at the end.

We encourage you to periodically review this statement to be informed of how we are using and protecting your Personal Data.

***If you do not wish to receive information from Dell Financial Services any more***

If you decide you no longer want to receive any information from Dell Financial Services any more send us an email to [Dell Financial Services Unsubscribe@dell.com](mailto:Dell_Financial_Services_Unsubscribe@dell.com). You may withdraw your consent at any time.

We will do all we can to ensure that your request will be dealt with within a period of 10 calendar days from the date you withdraw your consent.

Please note you may still receive information from us until the above time periods have expired.

***Who can you contact if you have any questions about this Direct Marketing Statement?***

If you have any questions in relation to this statement, please contact our Data Privacy Manager:

- by post at Dell Bank International d.a.c / Dell Financial Services, P.O. Box 12335, Dublin 18, Ireland or
- by email at: [dfs\\_emea\\_privacy@dell.com](mailto:dfs_emea_privacy@dell.com).

**Effective Date: 14<sup>th</sup> May 2018**