



## Local Appliance Rentals Limited Privacy Information

### Contact Us

Name: Local Appliance Rentals Limited  
Website: [www.localappliancerentals.co.uk](http://www.localappliancerentals.co.uk)  
Phone: 0800 160 1517

### Our Purpose and Lawful Basis for Processing

Local Appliance Rentals processes your personal data for explicit and legitimate purposes and has a valid lawful basis for this processing.

### Contract

We process your personal data in order to fulfill our contractual obligations to you, namely:

- Communicating with you about your rental application, the product, pricing and your rental contract.
- Arranging delivery of your rental goods and delivering your rental goods.
- If you refer someone to us, to organise payment to you in accordance with our referral offer.
- To enforce our rights and perform our obligations.
- To contact you regarding end of term rental options.
- To enforce any guarantee given or to be given by you or any guarantee given or to be given by another person as your guarantor.

### Consent

We obtain explicit consent from you for the following types of processing. This consent is separate and specific and requires you to positively opt in. We keep a record of your consent.

- We process your name and credit/debit card details into the Adelante Direct Debit payment system. Making your rental payments through Adelante is not a precondition of renting with us. We have other payment options available that do not involve the processing of your data into Adelante. We obtain consent for processing your data into Adelante by asking you to sign the Adelante Recurring Payments form.
- In the event that we receive a request to share information about your rental agreement or affordability assessment, from a third party advocate acting on your behalf, such as Financial or Legal Aid services, we will not share this information without your explicit written consent.
- We can obtain a read only version of your bank statements using the Decision Logic software system. We obtain consent from you for this by sending you an email or SMS link. This is not a precondition of service; you may choose to provide your bank statements manually to us.

### Legal Obligation

We come under the jurisdiction of the Consumer Credit Act 1974, the Financial Services and Markets Act 2000 and Financial Conduct Authority Regulations. To ensure compliance with our legal obligations we process your personal data for the following purposes:

- Preventing fraud through the verification of your identity;
- Assessing your creditworthiness by verifying your ability to afford your rental payments by obtaining information from both yourself and our credit reference agency; Experian;
- Protecting you from a rental agreement that may put you in a position of financial hardship;
- Ensuring we can demonstrate the reasonable steps taken to verify your affordability to the Financial Ombudsman;
- Ensuring our representatives are compliant in their dealings with you by auditing your rental contract;
- Monitoring your rental payments and keeping you informed of your account throughout the rental agreement;
- To respond effectively to disputes regarding your rental agreement.

### Legitimate Interests

We process your personal data because it is in our legitimate interests to do so. We have undertaken a Legitimate Interests Assessment to ensure your rights do not override our interests.

We process your data for the following purposes:

- To prevent fraud by verifying your identity;
- To protect your interests by verifying your affordability to ensure you do not enter into a contract that will put you in financial hardship;
- To assess existing or future application(s) for your consumer or commercial Rental account, responding to your questions, and protecting our assets
- To ensure good business practice by making sure you have the ability to meet your rental payments
- As we retain ownership of the goods throughout the rental agreement it is in our interest to be able to locate the goods
- To comply with our legal obligations under the Financial Conduct Authority
- To respond to any requests for information or disputes from third party advocates such as financial and legal aid services
- For administrative purposes including transmitting your data within our company group
- Direct marketing purposes including using the Mail Chimp and Esendex marketing automation platforms to contact you.
- Either us, or any Franchisee appointed by us can contact you about your end of term rental options, any trade up options or other special offers or promotions and providing you with information about our other products and services and the products and services offered by our Franchisees

Our processing of your data is necessary for the above purposes and we cannot reasonably achieve these purposes in another less intrusive way. We have balanced our interests against your rights and have concluded if you are entering into a consumer credit agreement you would reasonably expect the following:

- The standard industry practice of collecting your data to verify your identity and affordability
- Recording, organising and storing of your data in our electronic systems
- Retrieval of your data by staff members from our electronic systems

**Where do we get your data from?**

Most of your data is collected from you by your local franchisee representative. We do however collect data about you from Experian (our credit reference agency), this includes consumer credit report(s) about your application(s) for credit and commercial credit report(s) about your application(s) for credit. We may also collect your personal data from the supplier of the goods, other credit providers, insurers, any of your employers, former employers, referees, banks, landlords, guarantors, accountants, lawyers, financial advisers, service providers to us (including debt collection agencies, introducers, private investigators, professional advisers), professional organisations, the internet, public and subscriber only databases and government authorities.

**Who do we share your data with?**

We share your data with some external third parties (as disclosed above). Your data is also processed with Sales Force, our Customer Relationship Management software company. It may be necessary also to share your data with the Financial Conduct Authority in the event that we are audited. We are under a legal obligation to comply with the FCA. We may also need to share your data with the suppliers of our goods in order to arrange delivery of the product to you. We may also share your data with any of our related bodies corporate, our assignees or potential assignees, any other suppliers appointed by us, business providers, insurers, any guarantor or proposed guarantor, your assignees or proposed assignees, debt collection agencies, our banks and financial advisers, our lawyers, accountants and other professional advisers, any suppliers or contractor to us who may need to have access to your personal information to provided services to us or you (including, without limitation, valuers, physical and electronic file storage, receivables management and repair contractors or companies), and any persons specifically authorised in writing to obtain your personal information from us. Aside from this, your data is only shared with employees of your local franchise and our head office staff.

**Do we transfer your data internationally?**

Yes. Some of our highly trained compliance staff members are based at our Head Office in Australia. Your data may be accessed by these staff members from time to time. Standard contractual clauses with our Australian Head Office are there as a safeguard to protect your data and your rights. Our electronic systems are hosted on servers located in the United States with our hosting company; Blackbox VPS, but don't worry, none of your data is accessed in the United States. Standard contractual clauses with Blackbox VPS are there as a safeguard to protect your data and your rights. Some of our expert audit staff are based in the Philippines. They may need to access your data to audit your rental contract and make sure our representatives have been compliant in their dealings with you. These staff members are not an external agency but direct employees, just like our onsite staff. We have standard contractual clauses in place with these staff members as a safeguard to protect your data and your rights. All of our staff are committed to protecting your privacy and all of your data is strictly confidential.

**How long do we store your data for?**

We keep your data on our systems indefinitely in case a dispute arises about your rental agreement.

**What rights do you have regarding the processing of your data?**

You have the right to be informed about our purposes for processing your personal data, how long we retain your data for and who it will be shared with.

You have the right to be aware of and verify the lawfulness of our processing and confirm that your data is being processed. You have a right to access: your personal data; the purpose of processing; the categories of data we process; who your data will be disclosed to (including third parties and international organisation); how long your data is stored for; data we collect about you from third parties; any automated decision making or profiling on your data.

We must provide you with a copy of the personal data undergoing processing free of charge. For any further copies requested we can charge you a reasonable fee. If you request this electronically we must provide the information to you in a commonly used electronic form.

If we are processing data about you that is incorrect you can request verbally or in writing that we rectify this. We will action this request within one month. You are also able to request we erase any data we hold about you. We may not be able to erase your data in all circumstances due to our aforementioned legal obligations. You are also able to request we restrict the processing of your personal data.

In some instances you are able to obtain and reuse your personal data for your own purposes across different services. This only applies to data obtained by us on the basis of Contract or Consent and where processing is carried out by automated means.

This information is available in this Privacy Statement. We must provide you with this Privacy Statement at the time of collecting your personal data.

### **Can I make a complaint?**

Yes you can lodge a complaint with our supervisory authority: the Information Commissioners Office (the ICO).

### **Can you object to the processing of your data?**

You have the right to object to our processing of your personal data where we are processing it for our legitimate interests. Where you have given consent, you don't have the right to object but you can withdraw your consent. You can object on grounds relating to your own particular situation. We will stop processing your data unless we can demonstrate our grounds for processing override your interests or the processing is for a legal claim.

If you wish to object, withdraw your consent or exercise any of your rights you can contact your local branch or our Head Office or visit the [data protection page on our website](#).

## Credit Checking

Nobody has the right to credit. Before renting you goods we need to be confident you can meet your rental payments. To help us do this we look at information held by Experian, our credit reference agency. We are a Consumer Credit Account Information Sharing (CAIS) member. This means that in order to access consumer credit history we are required to contribute data on all our customers' rental accounts and account behaviour from the last six years. Your data will be shared with our credit reference agency (Experian) and our CAIS data processor (Oyster Bay). We have appropriate agreements in place with both processors. If personal information held about you is incorrect or out of date it could lead to you being unfairly refused credit. If we have reported incorrect information about you to Experian, you should contact us or Experian to have it rectified.

### You can contact Experian here:

Website: <http://www.experian.co.uk/contact-us/index.html>

Phone: +44 (0) 344 481 0800

The Information Commissioner's Officer (the ICO) also has guidance for consumers on credit and your privacy rights at this link: <https://ico.org.uk/for-the-public/credit/>

I declare that the information provided on the customer enquiry sheet is true and correct and on no occasion have provided any fraudulent or misleading information to the company.

I have read and agree to the terms of the Privacy Information and to my data being processed in all manners referenced in the Privacy Information.

**Customer Name:** \_\_\_\_\_

**Signature:** \_\_\_\_\_

**Date:** \_\_\_\_\_