

## HPI Hire Purchase Information DAC PRIVACY NOTICE

Hire Purchase Information DAC (“**we**”, “**us**”) respects your privacy and is committed to protecting your personal data. This privacy notice tells you how we look after your personal data and about your privacy rights and how the law protects you.

### 1. IMPORTANT INFORMATION AND WHO WE ARE

Hire Purchase Information Designated Activity Company (“HPI”) was established in 1948 and has been the source of all vehicular (and other “mobile” assets) finance records in Ireland. Financial Institutions interested in protecting their interest in assets may register details of their assets which are subject to lease or hire purchase agreements or other financial encumbrances. Subsequently other financial institutions, members of the motor trade, private companies or individuals interested in purchasing a relevant asset, can enquire on HPI’s records to see if a vehicle or asset is subject to a financial agreement. In general, title (ownership) to the asset remains with the financial institution holding the financial agreement until title transfers according to the terms and conditions of the agreement.

This privacy notice aims to give you information on how we collect and process your personal data through your interaction with our services.

It is important that you read this privacy notice together with any other fair processing notice or privacy notice we may provide on specific occasions when we collect or process personal data about you, so you are fully aware how and why we are using your data. This privacy notice supplements such other notices and does not replace them.

For the purposes of data protection legislation, including the General Data Protection Regulation (GDPR), we are the controller of your personal data. Our contact details are:

HPI Hire Purchase Information DAC 3<sup>rd</sup> Floor, Block D, Adelphi Plaza, Dun Laoghaire, Co. Dublin A96 T927

We have appointed a Data Protection Officer who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this notice, including any request to exercise any of your legal rights, please contact us using the contact details below:

[hpi.dpo@crif.com](mailto:hpi.dpo@crif.com)

Postal Address: 3<sup>rd</sup> Floor, Block D, Adelphi Plaza, Dun Laoghaire, Co. Dublin A96 T927.

This version was last updated in June 2022. We may change this privacy notice from time to time and any changes will be posted on this page.

It is important that the personal data we hold about you is accurate and up-to-date. Please let us know if any of your personal data changes during your relationship with us.

This document may include links to third party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third parties and are not responsible for their privacy policies. When you leave this page we recommend that you read the privacy notice of every website you visit and every plug-in or application you use.

### 2. THE DATA WE COLLECT ABOUT YOU

Personal data means any information about a living individual from which that person can be directly or indirectly identified. It does not include data where the identity has been removed (anonymous data). We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity data** including your first name, last name, username or other identifier, title;
- **Contact data** including, for example, your business registered address, billing address, email address, telephone numbers;

- **Technical data** including your internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other details about the devices you use to access, as recorded by our web server logs; and
- **Usage data** including information about how you use our products and services;
- **Database information** including categories of data which may directly or indirectly identify you when matched as a result of a search or associated with an encumbered asset or finance arrangement;
- **Recruitment Information** if you apply as a prospective employee to HPI Hire Purchase Information DAC including your CV, name, address, email, and other personal information.
- **Leased Asset Disposals** where titled leased assets are disposed of, and contain personal information in contracts performed to dispose of such assets

We also collect, use and share aggregated data such as statistical or demographic data. Aggregated data may be derived from your personal data but is not considered to be personal data in law as it does not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific feature of our services. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, the combined data is personal data and we deal with it in accordance with the applicable data protection laws, including obtaining your consent or providing you with advance notification, if necessary.

### 3. HOW YOUR PERSONAL DATA IS COLLECTED

We collect data from and about you in different ways, including by:

**Direct interaction with you.** You may give us identity, contact and or other personal information by filling in forms or by communicating with us by email or via our services. This includes data you provide when you order our products or services or create an account, request marketing information, use interactive features or give us feedback.

**Indirect interaction with you.** If you are a party to a finance agreement or other financing arrangement, your details may be identifiable either directly or indirectly from our database of encumbered assets or where your details are matched from a search of our database you may be indirectly identified.

**Automated technologies.** When you use our services, our server logs may automatically collect technical data about your equipment.

**Accessing the HPI database.** When you use our services we will process your information and other data which may include personal information.

### 4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to do so, and for our core services, this mostly involves directly identifying users of our services and indirectly identifying individuals. Our most common uses of your personal data will be:

- in order for us to perform our services to members when registering an encumbered asset or searching the HPI database;
- in order to establish if an asset is subject to a finance or financing arrangement indirect personal information may be included in this information;
- in order to process candidate applications if you apply for employment with us;
- in order to dispose of leased assets no longer subject to a financial arrangement or agreement;
- if it is necessary to do so for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; and/or
- in order for us to comply with a legal or regulatory obligation.

We do not rely on your consent as a legal basis for processing your personal data. You have a right to withdraw your consent, if you have given us consent for any reason, at any time by contacting us at the email or postal addresses provided above.

The table below sets out all the ways in which we use your personal data, which of the legal bases we rely on to do so and, where relevant, what the legitimate business interests are. We may process your personal data on the basis of more than one lawful ground depending on the specific purpose for which we are using your data.

| <b>Purpose/activity</b>                                                                                                                                                                                                     | <b>Type of data</b>                                                                                                                                                                                                                                                                   | <b>Lawful basis for processing</b>                                                                                                                                                                                                                                                                                                                                                               |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| To register you as a member                                                                                                                                                                                                 | Identity<br>Contact                                                                                                                                                                                                                                                                   | Contract                                                                                                                                                                                                                                                                                                                                                                                         |
| To collect, process and deliver data relevant to your use of the service, either directly via our Interface /website or indirectly via third parties who you have selected to provide service to you                        | Identity<br>Contact                                                                                                                                                                                                                                                                   | Contract                                                                                                                                                                                                                                                                                                                                                                                         |
| To process searches on the HPI database, which may indirectly identify individuals subject to a finance or financing arrangement or identified in finance or financing documentation or associated with an encumbered asset | Case identifier;<br>Vehicle<br>Registration<br>Number (VRN);<br>Vehicle<br>Identification<br>Number (VIN);<br>Vehicle Engine<br>Number; Name of<br>HPI registering<br>client, account<br>reference number,<br>account finance<br>type code; account<br>opening date,<br>account term. | Our legitimate interests                                                                                                                                                                                                                                                                                                                                                                         |
| To manage our commercial relationship with you                                                                                                                                                                              | Identity<br>Contact<br>Usage                                                                                                                                                                                                                                                          | Our legitimate interests:<br><br>Complying with our legal obligations                                                                                                                                                                                                                                                                                                                            |
| To administer and protect our business especially the HPI database (including troubleshooting, data analysis, testing, system maintenance, support, reporting & hosting data)                                               | Identity<br>Contact<br>Technical                                                                                                                                                                                                                                                      | Our legitimate business interests (running our business, providing admin & IT services, network security, preventing fraud).<br><br>Complying with our legal obligations                                                                                                                                                                                                                         |
| To generate anonymous data derived from or based on the Data so that the results are no longer personally identifiable with respect to any individual and/or to generate synthetic data                                     |                                                                                                                                                                                                                                                                                       | When we anonymise your data we do so pursuant to a further processing in line with the original purpose for which the personal data was collected. Your personal information will no longer be processed after anonymisation and you will no longer be identified. We then use this anonymised data for our legitimate interests to:<br><br>(a) providing, supporting and improving the Services |

|                                                                                                                |                                                                   |                                                                                                                                                                                                                                                                           |
|----------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                |                                                                   | <p>(b) conducting analytical research, compiling statistical reports and performance tracking;</p> <p>(c) developing other services and products</p> <p>(d) sharing such data with our affiliates, agents or third parties with whom we have a business relationship.</p> |
| To process prospective candidates' applications when applying for positions with HPI Hire Purchase Information | CV, name, address, contact details and other personal information | Our Legitimate interests (running our business and when assessing employment and staffing needs)                                                                                                                                                                          |
| To process disposals of leased assets                                                                          | Identity<br>Contact                                               | Contract                                                                                                                                                                                                                                                                  |

## 5. COOKIES

We use the following categories of cookies:

- **Strictly necessary cookies:** These are cookies that are required for the operation of our User Interface. They include, for example, cookies that enable you to load webpages.

More information about the individual cookies we use and the purposes for which we use them is set out in the table below:

| Cookie name               | Category           | Description                                                                                                                                                                                         | Expiry Period |
|---------------------------|--------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
| _RequestVerificationToken | Strictly necessary | Used to prevent a Cross-Site Request Forgery (CSRF) attack. A CSRF attack is based on a vulnerability that allows an attacker to induce users to perform actions that they do not intend to perform |               |
| .ASPXAUTH                 | Strictly necessary | Used for authentication purposes. It is an encrypted token used to identify a HPI Direct user that has successfully authenticated                                                                   |               |
| HPIDirect                 | Strictly necessary | Used to store temporary session values in encrypted format while a user is logged into                                                                                                              |               |

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|  |  | HPI Direct |  |
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You can set your browser to refuse some or all browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, some parts of our User Interface may become inaccessible or may not function properly.

## 6. DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data with the parties set out below for the purposes set out above:

- **Internal third parties:** other companies in our group who provide, inter alia, connector platforms that enable us to provide services, IT and system administration services, delivery services, and complaints handling services. The list of the data processors appointed by the Company is available upon request; and
- **External third parties:**
  - service providers (acting as processors) who provide, inter alia, connector platforms that enable us to provide services, IT and system administration services, delivery services, and complaints handling services. The list of the data processors appointed by the Company is available upon request;
  - professional advisers, including lawyers, accountants, auditors, bankers, insurers, who provide legal, accountancy, audit, banking, insurance or consultancy, or other services to us;
  - Regulators and other authorities who require us to report on processing activities in certain circumstances;
  - fraud prevention agencies;
- **other third parties:** if we transfer any part of our business or assets to them or acquire any part of their business or assets, or otherwise merge any part of our and their businesses; in any of these cases, the new owners of our business may use your personal data in the same ways and for the same purposes as set out in this privacy notice.

Where any service provider acts as a data processor under Data Protection Legislation, they will be subject to a contract that is binding on the processor with regard to the controller (us) and that sets out the subject-matter and duration of the processing, the nature and purpose of the processing, the type of personal data and categories of data subjects and the obligations and rights of the controller.

## 7. INTERNATIONAL TRANSFERS

### When and where your personal data may be transferred outside the EEA

Some of the third parties with whom we work may be based outside the European Economic Area (EEA), so their processing of your personal data will involve a transfer of this data outside the EEA, if we were to use cloud-based platforms to store personal data, this may involve the use of geographically-distributed data centres including data centres outside the EEA.

### How we protect your personal data outside the EEA

- data is stored and processed in the EEA;
- by a mechanism under the GDPR or EU approved rules, such as Standard Contractual Clauses;
- some data is stored and processed in the United Kingdom further to an adequacy agreement and in line with the provisions of the UK GDPR.

## 8. DATA SECURITY

We have put in place appropriate security measures to protect your personal data from being accidentally or unlawfully destroyed, lost or altered or disclosed or accessed in an unauthorised way. For example, we limit access to this information to authorised employees and contractors who need to know that information in order to operate, develop or improve our User Interface. Please be aware that although we endeavour to provide reasonable security for information we process and maintain, no security system can prevent all potential security breaches.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any relevant regulator of a breach if we are legally required to do so.

## 9. HOW LONG WILL YOU USE MY PERSONAL DATA FOR

|                                                                                                                                                                                                                                                                             |                                                                                                         |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------|
| We will only retain your personal data for as long as necessary to fulfil the purposes we collected and processed it for. Upon expiry of this period your personal data will be deleted. Periods for retention of personal data are set out below:Registered member details | 7 Years                                                                                                 |
| Asset Records                                                                                                                                                                                                                                                               | Duration of financial arrangement or agreement (6 months to 5 years / or when an asset is deregistered) |
| Database enquiries                                                                                                                                                                                                                                                          | 12 months                                                                                               |
| Leased Asset Disposal Records                                                                                                                                                                                                                                               | 7 Years                                                                                                 |
| Recruitment Candidate data                                                                                                                                                                                                                                                  | 18 months                                                                                               |
| Company Books and Records                                                                                                                                                                                                                                                   | 7 Years                                                                                                 |
| Contracts                                                                                                                                                                                                                                                                   | 7 Years                                                                                                 |

## 10. YOUR LEGAL RIGHTS

As a result of us collecting and processing your personal data, you may have the following legal rights:

- to access personal data held about you;
- to request us to make any changes to your personal data if it is inaccurate or incomplete;
- to request your personal data is erased where we do not have a compelling reason to continue to process such data in certain circumstances;
- to receive your personal data provided to us as a controller in a structured, commonly used and machine-readable format where our processing of the data is carried out by automated means and is based on: (i) your consent; (ii) our necessity for performance of a contract to which you are a party; or (iii) steps taken at your request prior to entering into a contract with us;
- to object to, or restrict, our processing of your personal data in certain circumstances;
- if we use your personal data for direct marketing, you can ask us to stop and we will comply with your request;
- if we use your personal data on the basis of having a legitimate interest, you can object to our use of it for those purposes, giving an explanation of your particular situation, and we will consider your objection;
- to object to, and not be subject to a decision which is based solely on, automated processing (including profiling), which produces legal effects or could significantly affect you; and
- to lodge a complaint with a data protection supervisory body, although we would welcome the prior opportunity to respond to any complaint.

The supervisory authority in the Republic of Ireland is the Data Protection Commission – 21 Fitzwilliam Square South Dublin 2, D02 RD28, Ireland – who may be contacted at <https://www.dataprotection.ie/>

To exercise any of your rights set out above, please contact us using the contact details above.