

Polestar

APPLICATION AND AGREEMENT PRIVACY STATEMENT

USE OF YOUR INFORMATION

Introduction

Volvo Car Financial Services UK Ltd (Company number 12718441), trading as **Polestar Financial ("VCFSUK")** and **Santander Consumer (UK) Plc** (Company number 02248870) (referred to as "**SCUK**" in this statement) are joint data controllers of your personal data. This means that VCFSUK and SCUK jointly decide the purposes and means for processing your information. VCFSUK and SCUK refer to ourselves as "**we**", "**our**" and "**us**" in this statement. If you have any queries about how we use your information, you can write to VCFSUK's Data Protection Officer at DPO@vcfsuk.com or Volvo Car Financial Services UK Ltd, Scandinavia House, Norreys Drive, Maidenhead, SL6 4FL. Please note that, where necessary, we will pass your query to SCUK, who will contact you about your query, or we may refer you directly to SCUK's Data Protection Officer or customer services department, as appropriate.

If you have any queries about how SCUK use your information you can write to SCUK's Data Protection Officer at Santander Consumer (UK) plc at Santander House, 86 Station Road, Redhill, Surrey, RH1 1SR.

This data protection statement explains how we will use the personal data that you provide to us. You may have provided it through your intermediary or an online application or as part of the information you give in the application process or if you enter into a finance agreement with VCFSUK. Please read this statement carefully. This explains how we use your information when you make an application for finance or enter into an agreement with us.

Where we refer to "intermediary" in this statement, we mean the dealership or finance broker that contacted us about your vehicle finance.

You can see this privacy statement at <https://www.polestar-finance.com/your-data/>. This statement may be updated from time-to-time.

Information we collect about you

We'll collect and use your personal data for different reasons. Before we provide services, goods or financing to you, we make checks to prevent fraud and money laundering and to verify your identity. These checks require us to process your information. The table below sets out the types of personal data we may collect about you and some examples of what this includes. We'll only collect data which is relevant to the application, agreement, finance product or service we provide to you.

Type of Data	Example
Identity information	Name, age, date of birth, marital status, and any ID documents required to be provided by you such as passport, ID card, driving licence (see Financial details below).
Contact details	Address, e-mail address, telephone number.

Financial details	Bank details, credit/debit card, P60, wage slip, pension statement, Ltd company accounts, council/ housing association tenancy agreement, bank statements, council tax bill, utility bills, proof of home ownership.
Background information	Address history, nationality, country of residence, residential status, employer's name and address, occupation, time in employment, gender, marital status.
Family, lifestyle or social information	Dependants, expenditure.
Products and services	Records of the finance products we provide you now or in the past, and how you use them. Or finance products you applied for but we didn't give you.
Technical data	Information such as IP address or mobile phone location data for how you access our services. We may also use cookies to remember how you access and use our website and your preferences. You can find more information in our cookies policy.
Biometric information	Fingerprint, voice or face so that you can use our online services.
Health data	Medical information you supply to us, proof of disability.
Public data	Information we collect from third parties and other public sources such as: Credit reference agencies Fraud prevention agencies Electoral roll Court records of debt judgments and bankruptcies This may include details about any criminal record and may also include information about any person you are "linked" with because you have made a joint application for a finance agreement with us.

From time to time, we may require other forms of personal information to comply with legal or regulatory requirements or to manage your application or agreement.

If you don't provide the mandatory information that we request from you, we may not be able to properly manage your application or the agreement we have with you. It may for example, affect our ability to assist you with any queries and may eventually result in us taking action under the terms of your finance agreement, including cancellation.

If your information changes during the term of the agreement we have with you, you must tell us immediately.

How do we collect data?

We collect personal data about you in two main ways. Either you give it to us, or we get it from somewhere else.

You give it to us

Most of the personal data we collect you give to us. This will happen, for example, when you apply for a finance product or service, or contact us.

When you make an application, we may sometimes ask for information which is optional - we'll let you know if that is the case. Otherwise, you'll need to provide all the information we ask for.

We get it from somewhere else

We may also get personal data about you from other people. This may include:

- Credit reference agencies – such as Experian, Equifax and TransUnion. They provide us with details about your identity and credit history.
- Fraud prevention agencies - such as Cifas and National Hunter. They provide us with information so we can confirm your identity and to help us prevent fraud and money laundering.
- Public sources – such as the Courts, the Electoral Register and Companies House if you are a business customer. They provide us with information so we can check what you've told us about yourself or your business.
- Partners – we partner with other companies who provide services directly to you. They'll share information with us for administration purposes so that we can form a view of you as a customer.

Use of your information

We can only use your personal data if we have a lawful reason for doing so. This is called a "legal basis". The table below sets out the purposes for which we use your information and the legal bases under data protection laws for doing so (where relevant):

LEGAL BASES	Some situations when we'll rely on it
<p>CONTRACT</p> <p>It is necessary for the performance of the contract with you or to enter into it. This includes verifying your identity and assessing your application for finance</p> <p>We have an agreement with you for a product or service. We need to use your data to do the things we've agreed to do.</p>	<p>Before you apply for finance with us, we may explain the product to you, send you information, give you a quote or help you with your application.</p> <p>We look at your application for finance and decide whether to provide it. This includes verifying your identity and assessing your application. Where we have an agreement with you for a product or services, we will need to use your data to do the things we've agreed to do. This includes administering the agreement between us, including tracing your whereabouts to contact you and recover debt, and to provide you with the service under that agreement. This includes managing your account, communicating with you, providing updates on the status of your account, mid and end agreement reviews, dealing with any complaints and notifying you of any changes to this statement.</p> <p>To keep our records up to date.</p> <p>To contact you about your finance agreement.</p>

LEGITIMATE INTEREST	
<p>It is necessary for our legitimate interests or that of a third party. We, or an organisation we share your data with (a third party), have a valid reason to use your data in the course of our business, where your rights are not seriously affected.</p>	<p>This includes:</p> <ul style="list-style-type: none"> • Assessing your application and your agreement and any lending and insurance risks. • To understand your needs and provide a better service to you, and to help us develop and improve our products and services. • Preventing fraud and money laundering, and to verify your identity, to protect our business and to comply with laws that apply to us. • Monitoring communications including online services, calls, letters, emails, SMS and texts to prevent and detect crime, to protect the security of our communications, systems and procedures, and for quality control and training purposes. • Contacting you to ask you to take part in customer satisfaction surveys and market research by email, letter, SMS or phone and to undertake and analyse those surveys and research. This is to allow us to benchmark our services and evaluate new and existing products and services. • For management and audit of our business operations including statistical analysis and accounting and system testing to protect our business. • Creating a profile of you to let us identify and personalise what products and services to offer to you for marketing purposes. • Conducting a propensity to renew analysis and evaluating those results to let us provide relevant and timely renewal communications. • Use by your intermediary for the reasons described under 'Disclosure to and use by third parties'.
LEGAL OBLIGATION	
<p>It is necessary for compliance with a legal obligation</p>	<ul style="list-style-type: none"> • This includes when you exercise your legal rights under data protection law, for example to respond to requests you send us for your personal information. • To verify your identity. • For the establishment and defence of our legal rights. We might do this if we need to bring or defend a legal claim. • For activities relating to the prevention, detection and investigation of crime, to conduct credit, fraud prevention and anti-money laundering checks and comply with our legal and regulatory responsibilities. • This may also include processing special categories of data about you, for example for our compliance with our legal obligations relating to vulnerable people or if you go into arrears with your payments for a health-related reason.

CONSENT	
<p>You have given us your consent to use it in certain ways.</p> <p>You can withdraw any consent to the processing of data at any time. Please contact us if you wish to withdraw your consent</p> <p>You can withdraw your consent to marketing at any time by following the instructions provided below under 'Marketing Preferences'</p>	<p>When you request that we disclose it to a third party or for direct marketing communications.</p> <p>You ask us to process special category data about you.</p> <p>You can withdraw your consent generally or for marketing at any time by following the unsubscribe instructions in the relevant communication, contacting our customer services department on 0330 678 1548 or writing to us at customerservices@polestar-finance.co.uk, or Polestar Finance, Santander House, 86 Station Road, Redhill, Surrey, RH1 1SR.</p>
WHAT IS SPECIAL CATEGORY DATA?	
<p>This includes information about any of the following:</p> <ul style="list-style-type: none"> • your race or ethnicity, • political views or trade union membership, • religious or philosophical beliefs, • genetic or biometric data, • information about your health, sex life or sexual orientation. <p>We may use this data where we have your consent or a legal reason to do so.</p>	

Disclosure to and use by third parties

As VCFSUK and SCUUK are joint data controllers of your information, certain information is shared between us. VCFSUK uses your information to administer your finance application and the finance agreement. SCUUK uses your information to undertake the underwriting process (for example, to conduct credit and fraud prevention checks and generally assessing lending risks) and to contact you about arrears and to recover monies owed to us, where applicable.

We may disclose, or make available, your information to the following third parties:

- **Our group of companies*** [see Group companies](#) whom will use your information to better understand you as a customer and for reporting and analysis purposes to assist in the development and improvement of existing and new products and services.
- **Credit reference agencies** including Experian, TransUnion and Equifax, and fraud prevention agencies. Further information is set out below about these agencies and what they do – you can also contact us on [0330 678 1548](tel:03306781548). Alternatively, you can view a copy of this privacy statement at <https://www.polestar-finance.com/your-data/>.
- **Law enforcement agencies** to detect, investigate and prevent crime. We or a fraud prevention agency may pass your information to police and law enforcement agencies.
- **Government bodies and dispute resolution bodies.** This may include the Financial Ombudsman Service, HMRC and our regulators in the UK and elsewhere. If we need to share information about you with HMRC, they may share this with tax authorities outside the UK.

- **Third party debt collecting agencies** engaged by us to recover money owed to us.
- **Any third party to whom we sell your debt.** If we do this, you will be notified, and that third party will become the data controller of your information.
- **Your intermediary or any other franchised intermediary, to help us administer your proposal, application or agreement, to undertake processing for general administrative purposes, or to provide information to you to ensure you are fully informed to make the most appropriate decision towards the end of your finance agreement.** This includes mid and end agreement reviews and for them to send you marketing communications about their products and services if you have consented to receive them.
- VCFSUK will use your information to better understand you as a customer, for reporting and analysis, and to assist in the development and improvement of existing and new products and services. The manufacturer will also use your information to send you marketing communications if you have consented to receive this.
- Where you have taken out an agreement for finance and as advised in your customer agreement; **the associated vehicle manufacturer of the franchised intermediary where you purchased your vehicle.** They will use your information to better understand you as a customer, for reporting and analysis, and to assist in the development and improvement of existing and new products and services. The manufacturer will also use your information to send you marketing communications if you have consented to receive it.
- If applicable, **an alternative franchised intermediary,** which takes responsibility for the management of your vehicle via transfer or reallocation of responsibilities, to assist us with administering your agreement.
- **Third parties acting on our behalf.** These include back-up and server hosting providers, IT software and maintenance providers and their agents and third parties that provide income verification, affordability checks and communication fulfilment, and payment systems providers.
- When you instruct us to transfer funds overseas, we will share your information with service providers such as EBA-Clearing who provide international clearing facilities. They will process your information to facilitate your transfer and to detect and prevent criminal activity. This may include the creation of tools and data models for these purposes. The lawful basis for this sharing of your information may be our performance of our contract with you or our and your legitimate interests.
- **Outsourced service providers** required for compliance with a legal or regulatory obligation, provision of your account service or for marketing activities where your consent has been provided.
- Legal and other professional advisors including our auditors.
- **Market research organisations** engaged by us to undertake customer satisfaction surveys and market research.
- **Courts** in the United Kingdom or abroad as necessary to comply with a legal requirement, for the administration of justice, to protect vital interests and to protect the security or integrity of our business operations.
- If we or the Santander group undergoes a group reorganisation or is sold to a third party, your personal information provided to us may be transferred to that reorganised entity or third party and used for the purposes highlighted in this data protection statement.
- Anyone else we may need to in the following situations:
 - **In an emergency or to protect your vital interests.**
 - **To protect the security or integrity of our business operations.** For example, if someone tried to hack our systems, we might need to share information about you with third parties to help us respond.
 - **To comply with law.**

Use by credit reference and fraud prevention agencies

When you apply for any product and while you have it, we'll share the information we hold about you with fraud prevention agencies to check your identity and prevent fraud or money laundering.

This includes information you give us when you apply as well as information we receive from third parties and information we already have from other finance agreements, information about your financial situation, financial history and fraud prevention.

If we identify fraud, we may refuse to give you a product or service you've asked for. We may also stop providing you with an existing product or service. We'll also share this information with fraud prevention agencies. This may mean that other people refuse to provide you with products, services or employment in future.

If we need to trace you, we may also check the data we hold about you with credit reference agencies.

CREDIT REFERENCE AGENCIES

The credit reference agencies (CRAs) we use are called Experian, Equifax and TransUnion.

CRAs will supply to us both public information including the electoral register and shared credit, financial situation, financial history and fraud prevention information.

Does this leave a record?
When we request a credit check, the credit reference agency will place a record on your credit file. There are two types of check. <ul style="list-style-type: none"> • A soft check. This doesn't affect your credit score and other lenders won't be able to see it. • A hard check. This records that you have applied for finance. Other lenders will be able to see it and it may affect your ability to borrow money.
Do we always do a hard check?
We do a hard check when you apply to borrow money from us. But, if you just ask us to check if we're likely to be able to lend to you, then we won't. In that case we may in some instances do a soft check.

We share information regularly about you, your accounts and how you manage them with credit reference agencies. We do this while you have an account with us and owe us money. This'll include information about any finance applications you make, even if we don't approve them, the amounts you owe and if you make your repayments for money in full and on time. We will also inform the CRAs about your settled accounts. If you're a business customer, we'll also share information about your business.

The credit reference agencies may share this information with other organisations. They'll share with us similar information which other organisations give them about you.

We'll use the information we receive to help us assess your creditworthiness and whether you can afford the product you have applied for, ensure any offers provided to you are appropriate to your circumstances. We may also use it to check the accuracy of the data you have provided to us, prevent criminal activity, fraud and

money laundering and manage your account. We may use this information to help us trace you and recover any amounts you owe us, if we need to. Other organisations who receive this information may use it in a similar way.

If you are making a joint application or tell us that you have a spouse or financial associate, we will link your records together. You should make sure you discuss this with them, and share this information with them, before making an application to us. CRAs will also link your records together and these links will remain on your and their files until you or your partner successfully files for a disassociation with the CRAs to break that link.

How long do credit reference agencies keep information about your accounts?

Credit reference agencies keep information we share about your accounts for 6 years after the account closes. They'll keep this information even if you've repaid any money you borrowed in full.

If you want to know more about how credit reference agencies use and share your data
Check the 'Credit Reference Agency Information Notice' – you can find this on their websites at: <ul style="list-style-type: none">• EXPERIAN.CO.UK/CRAIN• EQUIFAX.CO.UK/CRAIN• TRANSUNION.CO.UK/CRAIN

Automated decisions and profiling

We make decisions about you in different ways. Some decisions will be made by our staff but we may use automated systems to help us make other decisions.

Profiling

As part of the processing of your information, decisions may be made by automated means.

Your information will be used to assess your credit risk using an automated decision-making technique called 'credit scoring'. Various factors help us to assess the risk. A score is given to each factor and a total credit score obtained, which will be assessed against a confidential pre-set pass score.

For fraud prevention checks, this means that we may automatically decide that you pose a fraud or money laundering risk if:

- Our processing reveals your behaviour to be consistent with money laundering or known fraudulent conduct or is inconsistent with your previous submissions.
- You appear to have deliberately hidden your true identity.

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 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 on the details above.

You have rights in relation to automated decision making; if you want to know more, please contact us using the details set out above.

You can view a copy of this privacy statement at <https://www.polestar-finance.com/your-data/>.

Automated Decisions

During the term of the finance agreement we have with you, we may conduct automated processing of your information in other ways. We may use automated processing to analyse or predict your economic situation, personal preferences, interests or behaviour. This could mean that automated decisions are made about you using your information. For instance, we might do an analysis of certain customer demographics such as your characteristics. We may also analyse triggers and events such as the maturity dates of your agreement.

In some instances, we may carry out automated processing and decision making to do behavioural scoring. This can include looking at the accounts and products you already have with us and how they are being conducted, such as account activity, arrears and other indications of financial difficulties. We will do this where this information is relevant to the product that we think you might be interested in. This will help us to decide whether other products and services might be suitable for you. All of this includes an element of automated processing.

We will use the information obtained from this activity to send direct marketing communications to you where you have consented to receive them and decide which of our other products and services might be suitable for you. This can include those which are offered by us, by us in conjunction with our partners, or by the Santander group of companies. This means that automated decisions and processing can help to determine what marketing communications you receive, when you receive them and what marketing activity is conducted by us or one of our third parties.

In addition, when we provide a product or service to you, we take into account other information that we hold about you, including how you use this and other accounts you have with us or our group of companies.

Data anonymisation and use of aggregated information

Your information may be converted into statistical or aggregated data in such a way as to ensure that you are not identified or identifiable from it. Aggregated data cannot be linked back to you. It might be used to conduct research and analysis, including to produce statistical research and reports. This aggregated data may be shared in several ways, including with our group companies* [see Group companies](#), your intermediary and VCFSUK.

Your Marketing Preferences

We'll use your data to provide you with information about our products and services. We'll only contact you by post, phone, email or social media according to your marketing preferences.

You can change these or unsubscribe at any time by contacting our customer services department on [0330 678 1548](tel:03306781548) or write to us at customerservices@polestar-finance.co.uk or Polestar Finance, Santander House, 86 Station Road, Redhill, Surrey, RH1 1SR.

Monitoring What you say to us

We monitor and keep records of the communications you have with us. This includes your calls, emails, texts, social media messages, letters and chats online.

Why do we do this?

We do this for various business reasons. This includes to:

- keep a record of your instructions so that we can check them if we need to
- monitor how you treat our staff and how they treat you
- help train our staff and improve our products and services and the way we deliver them
- prevent and detect fraud or any other criminal activity and
- comply with our legal and regulatory obligations.

Retaining your information

If your initial quote or your application for finance is declined or if your application is accepted but you do not proceed, we keep your information for 18 months or as long as necessary to deal with any queries you may have. If your application is accepted and you proceed, we hold your information for 10 years from the date at which your agreement is closed, where settled by you or upon default or as long as necessary thereafter to deal with any queries you may have.

Credit reference agencies will retain the account information that we give to them for 6 years after your account is closed. Please refer to the privacy statement provided to you when you applied for finance with us for more information about the information that we give to credit reference agencies. Alternatively, you can view this privacy statement at <https://www.polestar-finance.com/your-data/>.

Fraud prevention agencies can hold your information for different periods of time, and if you are considered to pose a fraud or money laundering risk, your information can be held for up to 6 years.

We may hold your information for a longer or shorter period from that described above where:

- The law requires us to hold your personal information for a longer period or delete it sooner.
- You exercise your right to have the information erased (where it applies) and we do not need to hold it in connection with any of the reasons permitted or required under the law.
- In limited cases, the law permits us to keep your personal information indefinitely provided we put certain protections in place.

Transfers to third countries/ where we store your information

We store your information on servers located within the United Kingdom (UK) and the European Economic Area (EEA). The third parties listed under 'Disclosure to and use by third parties' may be located outside of the UK or EEA or they may transfer your information outside of the UK or EEA. Those countries may not have the same standards of data protection and privacy laws as in the UK. Whenever we transfer your information outside of the UK, we impose contractual obligations on the recipients of that information to protect your

personal data to the standard required in the UK. We may also require the recipient to subscribe to international frameworks intended to enable secure data sharing. Any third parties transferring your information outside of the UK must also have in place appropriate safeguards as required under data protection law.

Your rights

You have various rights under the law over the personal data we hold about you. These may not always apply or be subject to certain circumstances. Here's a summary in the table below.

You have the right to	What you should know
Be informed about how we use your data	That's why we explain how we use your data in this statement.
Have access to your data	You can ask us for a free copy of the personal data we hold about you and information about how we process it.
Have your data changed	If the data we hold about you isn't correct or complete, you can ask us to correct it or add information so that it's complete. We'll let you know when we've done this. We may refuse your request in some situations – we'll let you know, and why, if that happens.
Have your data deleted Some people call this the right to be forgotten	You can ask us to delete your data but we won't always do so. For example, we might need to keep it for legal reasons. If we aren't going to delete your data, we'll let you know why.
Object to how we use your data	You can ask us to stop using your data for certain purposes. If we use your data for some things, like direct marketing, we'll always stop. But, in other situations, we don't always need to or we may refuse. If that's the case, we'll let you know.
Restrict how we process your data	You can ask us to limit how we use your data. You may, for example, want us to do this if the data we hold about you is not correct or complete. We won't always be able to limit how we use your data. For example, if we need to use it for legal reasons. If we refuse to limit how we use your data, we'll let you know why.
Move, copy or transfer your data - data portability	You can ask us for a copy of your personal data in a format that allows you to move it somewhere else. You can also ask us to send it to someone else.
Challenge an automated decision	If we make an automated decision, you can ask for information about how we make the decision and ask for an individual to make it instead.
Withdraw your consent	Where you have provided consent to the processing of your data you have the right to withdraw your consent.

More information on your data subject rights and how to exercise these rights can be found in the 'Using my information' booklet at <https://www.polestar-finance.com/your-data/> or by requesting a copy via email from customerservices@polestar-finance.co.uk or calling our customer services team on [0330 678 1548](tel:03306781548). If you would like to discuss or exercise any of these rights, please contact us by writing to Polestar Finance, Santander House, 86 Station Road, Redhill, Surrey, RH1 1SR or using the above contact information.

We may update the data protection statement from time to time. When we change the data protection statement in a material way, a notice will be displayed on our website along with the updated data protection statement.

If you're not happy with how we use your data

We encourage you to contact us before making any complaint and we will seek to resolve any issues or concerns you may have. You can also contact our DPO with any data protection concerns by writing to DPO@vcfsuk.com or Volvo Car Financial Services UK Ltd, Scandinavia House, Norreys Drive, Maidenhead, SL6 4FL. Please note that, where necessary, we will pass your query to SCUK, who will contact you about your query, or we may refer you directly to SCUK's Data Protection Officer or customer services department, as appropriate.

You have the right to complain to the Information Commissioner's Office where your data has or is being used in a way that you believe does not comply with data protection laws. You may contact the ICO and find out more information from the ICO website ico.org.uk.

***Group companies**

The Santander group of companies includes but is not limited to Banco Santander S.A.; Santander Consumer Finance S.A., Santander UK Group Holdings plc; Santander UK plc, Santander Consumer (UK) plc trading as Santander Consumer Finance; Santander Insurance Services UK Ltd.

The Volvo group of companies, which includes but is not limited to Volvo Car Corporation, Volvo Car UK Limited and any parent companies or subsidiaries.