

GE Capital Equipment Finance Privacy Notice

Last updated May 2018

GE Capital Equipment Finance Ltd respects your concerns about privacy. References in this Privacy Notice to “HEF”, “we”, “us”, and “our” are references to GE Capital Equipment Finance Ltd that is responsible for the processing of your personal information.

This notice (“Notice”) describes how we, as Data Controller, will handle, share and protect personal information that you provide, or which we obtain about you.

1. What does this Notice Cover?

This Notice applies to the personal information we obtain through various channels in connection with finance offering to you. In addition to collecting personal information directly from you, we may collect personal information from third parties, such as credit reference agencies or publicly available sources, as required or permitted by local law.

This Notice describes the types of personal information we obtain, how we may use that personal information, with whom we may share it, and how you may exercise your rights regarding our processing of the information. The Notice also describes the measures we take to safeguard the personal information we obtain and how you can contact us about our privacy practices.

This Notice is limited to HEF and does not apply to personal information obtained through other GE channel websites such as our careers website, which is subject to the Candidate Privacy Notice available at www.GE.com.

2. What information does HEF collect about me?

We may obtain personal information through various channels : (i) directly from you (by email, telephone conversations, written correspondence); (ii) indirectly from other GE businesses where you have demonstrated an interest in financing from us; (iii) from credit rating agencies for purposes of performing credit and identity checks and (iv) from public sources. The types of personal information we may obtain include:

- contact information (such as name, phone, email and postal address) for you or for others (e.g., principals in your business) and your business, we may obtain government-issued ID numbers and Tax ID numbers;
- biographical and demographic information (such as date of birth, age, gender, job title/position, marital status);
- purchase, lending and customer service history;
- financial information (such as payment information, including name, billing address and payment card details (i.e., card number, expiration date and security code); bank account information; financial statements; income, expenditure; and credit score);
- Information on the financing (lease, hire, hire-purchase) contracts (financed object, finance installments, residual value, term, installment arrears, termination, end of contract and comparable data) and on such previously concluded contracts;
- other personal information contained in content you submit to us.

Please note that providing personal information to us is voluntary on your part. If you choose not to provide us certain information, we may not be able to fulfil our legal or compliance obligations and we may not be able to offer you certain products and services, to maintain a contractual relationship with you, or we may even have to terminate such relationship.

By providing us with personal information you confirm that: (i) you have reviewed this Notice and agree to its processing as explained herein; and (ii) you have provided notice and obtained the necessary consent to share the personal information of others, such as directors, officers, shareholders, employees, signatories of the contract, beneficial owners, guarantors and other security providers or other natural persons.

3. How does HEF use my personal data?

We may use the personal information we obtain to:

- provide and administer our financing solutions and related services; initiate, conclude and execute financing contracts (legal basis: performance of the contract);
- perform accounting, auditing, billing, reconciliation and collection activities (legal basis: legitimate interest ensuring financial soundness of activities);
- process credit applications, assess creditworthiness on the basis of score values obtained from credit rating agencies and product suitability, and keep you informed about the status of your application (legal basis: legitimate interests in the risk assessment of financing contracts and performance of the contract);
- perform data analytics (trend analysis, financial analysis and customer segmentation) (legal basis: legitimate interests in the monitoring of the portfolio);
- provide contract administration and customer support, including relating to complaints and data access requests and manage dispute resolution and enforcement of claims (legal basis: performance of the contract);

- create, administer and communicate with you about your account (legal basis: performance of the contract);
- perform ongoing internal Group risk analysis, assessment and management, and comply with Group controlling and related internal Group reporting obligations (legal basis: legitimate interests in ensuring own economic stability);
- verify your identity and protect against and prevent fraud and other unlawful activity, unauthorized transactions, claims and other liabilities, and manage risk exposure and quality (legal basis: legitimate interests in economic protection of concluded transactions);
- fulfil legal reporting and notification obligations arising from the law of the Member States, in particular to combat money laundering and terrorism (legal basis: fulfilment of legal obligations);
- conduct investigations and comply with and enforce applicable legal requirements ((legal basis: fulfilment of legal obligations);
- for the fulfilment of rights of data subjects according to the DSGVO and for the processing of inquiries to the data protection officer (legal basis: fulfilment of legal obligations);
- proceed with a refinancing, syndication, merger, reorganization, divestiture, or transfer of business, or alternatively to introduce to third party financiers (legal basis: legitimate interest in asset management); and
- submit related offers at the end of the contract (legal basis: legitimate interests in the care and maintenance of existing customer relationships).

We may combine personal information we obtain through various channels for the purposes described above. We may anonymise or aggregate personal information and use it for the purposes described above and for other purposes to the extent permitted by applicable law.

4. Who does HEF share data with, or transfer data to?

We do not sell or otherwise disclose personal information about you except as described here or at the time of collection.

- We may share personal information within HEF and other companies within the GE Group for the purposes described in this Notice.
- We may share personal information with service providers we have retained to perform services on our behalf (such as customer support, payment processing, and data analytics). These service providers are contractually required to safeguard the information and are restricted from using or disclosing the information provided to them except as necessary to perform services on our behalf or to comply with legal requirements.
- We may disclose your information to manufacturers, suppliers, resellers, brokers, assignees, funders, agents, sub-contractors, credit reference agencies and guarantors for the purposes described in this Notice;
- We may disclose personal information about you (1) if we are required to do so by law or legal process (such as a court order or subpoena), (2) to law enforcement authorities or other government officials to comply with a legitimate legal request, (3) when we believe disclosure is necessary to prevent physical harm or financial loss, (4) to establish, exercise or defend our legal rights, (5) in connection with an investigation of suspected or actual fraud or illegal activity or (6) otherwise with your consent.

We reserve the right to transfer any information we have about you in the event of a potential or actual sale or transfer of all or a portion of our business, assets or interests (including in the event of a merger, acquisition, joint venture, reorganisation, divestiture, syndication, dissolution or liquidation). In such case, we will require the relevant third parties to provide comparable levels of protection as we provide with respect to the information we share.

Credit Reference Agencies

In order to process your application, we will perform credit and identity checks on you with one or more credit reference agencies (“CRAs”). We may also make periodic searches at CRAs to manage your account with us and to comply with our financial crime compliance program.

To do this, we will supply your personal information to CRAs and they will give us information about you. This will include information from your credit application and about your financial situation and financial history. CRAs will supply to us both public (including the electoral register) and shared credit, financial situation and financial history information and fraud prevention information.

We will use this information to:

- Assess your creditworthiness and whether you can afford to take the product;
- Verify the accuracy of the data you have provided to us;
- Prevent criminal activity, fraud and money laundering;
- Manage your account(s);
- Trace and recover debts; and
- Ensure any offers provided to you are appropriate to your circumstances.

We will continue to exchange information about you with CRAs while you have a relationship with us. We will also inform the CRAs about your settled accounts. If you borrow and do not repay in full and on time, CRAs will record the outstanding debt. This information may be supplied to other organisations by CRAs.

When CRAs receive a search from us they will place a search footprint on your credit file that may be seen by other lenders.

If you are making a joint application, we will link your records together, so you should make sure you discuss this with them, and share with them this information, before lodging the application. CRAs will also link your records together and these links will remain on your and their files until such time as you or your partner successfully files for a disassociation with the CRAs to break that link.

The identities of the CRAs, their role also as fraud prevention agencies, the data they hold, the ways in which they use and share personal information, data retention periods and your data protection rights with the CRAs are explained in more detail on the Credit Reference Agency Information Notice (CRAIN) which is accessible from each of the three CRAs – clicking on any of these three links:

Call Credit: www.callcredit.co.uk/crain

Equifax: www.equifax.co.uk/crain

Experian: www.experian.co.uk/crain

5. How does HEF protect my data?

We maintain administrative, technical and physical safeguards, consistent with legal requirements, designed to protect against unlawful or unauthorized destruction, loss, alteration, use or disclosure of, or access to, the personal information provided to us.

Wherever we share personal information we will exercise measures to safeguard it and ensure it is only processed as strictly necessary to fulfil a contractual task or legal obligation.

We may transfer the personal information we collect to, and store such data in, other countries, including the U.S., which may have different data protection laws than the country in which the information was provided. If we do so, we will transfer the personal information only for the purposes described in this Notice. To the extent required by applicable law, when we transfer your personal information to recipients in other countries, we will take measures to protect that information.

- To the extent the information is transferred to affiliated companies outside the European Economic Area, the GE Group has entered into Binding Corporate Rules governing our handling of personal information of residents of the European Union. For further information about the GE Group's Binding Corporate Rules, please click here. [<https://www.ge.com/bcr>];
- Where service providers based outside the European Economic Area are engaged, we have entered into additional contracts with them to secure data transmission, which contain the European Commission's standard contractual clauses.

6. How long is my data retained for?

Your personal data is retained in accordance with our Data Retention Policy, which is designed to make sure data is kept for no longer than necessary, and is disposed of where there is no longer a valid reason for the data to be retained.

Data retention periods are determined by taking into account legal limitation of liability periods, agreed contractual provisions, applicable regulatory and tax requirements and industry standards.

7. What are my rights?

You have a number of rights available to you when it comes to the processing of your personal data.

Data Access

You have the right to request a copy of the information that we hold about you. If you would like a copy of some, or all, of your personal information, please email if_privacy@ge.com or write to us at the following address: Data Privacy Desk - GE Capital Equipment Finance Ltd, 2630 The Quadrant, Aztec West, Bristol BS32 4GQ.

We will not charge you for this service. To help protect your privacy and maintain security, we may take steps to verify your identity before granting you access to the information.

Data Rectification

We want to make sure that your personal information is accurate and up to date. If you believe the personal data we hold about you is inaccurate you have the right to challenge it. You may ask us to update, correct or erase information you think is inaccurate.

Data Erasure / Objection to processing

You have the right to request your personal data to be deleted or alternatively object to your personal data being processed in certain circumstances. You may ask us to delete or cease to process your data and we will assess your request. The data held by us is important to ensure compliance with our legal and regulatory obligations or our legitimate interests as a responsible lender, preventing fraud and money laundering, compliance with contractual provisions, and legal liability limitation periods. It will be rare that we do not have compelling, overriding grounds to carry on using the personal data following an objection or request for erasure.

Restriction of Processing

You have the right to request we restrict how we use your personal data. The right is not absolute and we may still continue to process your personal data where certain grounds are established:

- With your consent;
- For the establishment, exercise, or defence of legal claims
- For the protection of the rights of another natural or legal person;
- For reasons of important public interest.

Data Portability

You have the right to receive a copy of your personal data in a structured, commonly used format, and to have your data transmitted to another controller where we are processing such data for the purposes of performance of a contract, or with your consent.

This right does not apply where we are processing data for other purposes, such as for compliance with a legal obligation or for another legitimate interest.

8. How do I make a complaint?

If you have a complaint regarding our processing of your personal data, please email if_privacy@ge.com or write to us at the following address: Data Privacy Desk - GE Capital Equipment Finance Ltd - 2630 The Quadrant - Aztec West - Bristol BS32 4GQ. We will respond to your complaint within eight weeks. If you are not satisfied with our response you may have the right to file a complaint with a supervisory authority or other governmental regulator.

You can also refer your concerns to the Information Commissioner's Office (or ICO), the body that regulates the handling of personal data in the UK. You can contact them by: Website: www.ico.org.uk/concerns - Telephone Helpline: 0303 123 1113 - Writing to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF

9. How do I withdraw consent?

If you provided your consent to us processing your personal data, you may withdraw consent you previously provided to us or object at any time to the processing of your personal information on legitimate grounds relating to your particular situation, and we will apply your preferences going forward as appropriate.

It is important to note that data provided to us by you is largely processed for the performance of a contract, for adherence to legal requirements and for other legitimate interests. There may be limited instances where we process data based solely on your consent and as such we may not be able to comply with any request to cease to process this data.

You may submit an application to withdraw consent by email at if_privacy@ge.com or by writing to us at the following address:

Data Privacy Desk - GE Capital Equipment Finance Ltd, 2630 The Quadrant, Aztec West, Bristol BS32 4GQ.

10. Does HEF use automated decision making?

We do not use personal data provided by you for automated decision making or profiling activities.

11. How do I contact HEF?

Email: if_privacy@ge.com – we aim to respond to your query within two working days

Post: Data Privacy Desk - GE Capital Equipment Finance Ltd, 2630 The Quadrant, Aztec West, Bristol BS32 4GQ.

Changes to Our Privacy Notice

This Privacy Notice may be updated periodically and without prior notice to you to reflect changes in our information practices. We will indicate at the top of this Privacy Notice when it was most recently updated.