



## Air Freedom - Privacy Policy

We take the privacy of our customers very seriously. We ask that you read this Privacy Policy ('the Policy') carefully as it contains important information about how we will use your personal data.

For the purposes of the Data Protection Act ('DPA'), we are the 'Data Controller' (i.e. the company who is responsible for, and controls the processing of, your personal data).

This Policy was last updated on 19th October 2018 and is in line with the General Data Protection Regulation (GDPR) reform that came into force in May 2018. The reform sets out more rights for individuals and greater transparency in how personal data is processed by Data Controllers, such as consent, distribution, marketing and deletion. As we are a credit intermediary, we undertake a number of financial tasks that relate to consumer credit. Our firm's lawful basis for processing your personal data is done so under a Legitimate Interest - Article 6(1)(f) - "the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests."

### Personal data we may collect

We will obtain personal data about you (including your name, address, date of birth, contact information, payment details, financial information and opinions) and those whose personal data you have with express authority disclosed to us ('others') whenever you complete an online or paper form, make a telephone enquiry with us, or receive our services. If you submit an online enquiry you will be required to agree to the terms of this Policy which include permitting us to contact, you for the purposes of the finance related enquiry via the contact means of which you provide us with the details of. i.e. email address, telephone number, etc.

For example, we will obtain personal data when you (e.g. contact us for any reason, or purchase services). In certain circumstances, we may hold sensitive personal data if you provide us with such information if you feel that it is relevant for the purpose of your enquiry, but we will not ask for such information. Any sensitive personal data obtained and recorded will only be done so with your explicit consent.

### How we use personal data

We will use the personal data you disclose to us for the purposes described in Our Terms. These purposes include:

to assist us in processing your enquiries and obtaining the services which you require;



to help us identify you and any accounts that you hold with us;

- undertaking credit checks;
- administration;
- research, statistical analysis and behavioural analysis;
- customer profiling and analysing your preferences;
- marketing (providing you have opted-in) [for further information see 'Marketing and opting-in' below];
- fraud prevention and detection;
- billing and order fulfilment;
- customising our website and its content to your particular preferences;
- to notify you of any changes to our website or to our services which may affect you;
- security vetting; and
- improving our services.

### Marketing and opting-in

We may share your personal data with organisations as set out in the 'Disclosure of personal data' section below. If you have opted-in to receive our marketing material, we will ensure that it is to your requirements and granular. We or they may contact you or others (unless you have asked us or them not to do so) by mail, telephone, text message, email, (each contact method requires its own consent via an opt-in selection) The nature of these marketing communications relate to information on products, services, promotions and special offers which we believe may be of interest to you or others. If you or others would prefer not to receive any further direct marketing communications from us or our business partners, it is possible to opt out at any time. See further 'Your rights' below.

### Disclosure of personal data

We may disclose personal data which you provide to us to:

- Our agents and service providers (e.g. providers of web hosting, maintenance services or potential funders);
- Law enforcement agencies in connection with any investigation to help prevent unlawful activity;
- Our business partners in accordance with the 'Marketing and opting out' section above, specifically being:
  - our group companies (as defined in the Companies Act 2006);
  - finance companies with whom we deal for the purposes of providing our services to you;
  - Insurance companies with whom we deal for the purposes of providing our services to you and to verify information provided to us by you; and
  - other third parties with whom we deal with in the course of providing our services to you; and
- Any regulators within whose jurisdiction we operate within from time to time.



Please be aware that we will not sell or otherwise disclose any personal data provided to us to any other party.

### Keeping data secure

We currently safeguard personal data by storing it on a CRM protected by password and shall ensure that from time to time we use no lesser technical and organisational measures to safeguard personal data which is disclosed to us. Whilst we will use all reasonable efforts to safeguard such personal data, you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal data which are transferred from you or to you via the internet.

### Monitoring

We may monitor and record communications with you (such as telephone conversations and emails) for the purpose of quality assurance, training, fraud prevention or compliance purposes.

### Information about other individuals

If you give us information about others, you confirm that the other third party person has appointed you to act on his/her behalf. This is also relevant where others are concerned if you indeed ask another person to act on your behalf as a third party.

Under the third-party authorisation, the other person can:

Give consent on his/her behalf to the processing of his or her personal data for the purposes and reasons set out in this Policy; and

Receive on his/her behalf any data protection notices.

Such authorisation will remain in place until this has been revoked, either by verbal or written communication.

### Use of Google Analytics Advertising

We use Google Analytics Advertising Features ('GAAF') through our website, which means that certain information about the traffic on our website is collected. In light of using GAAF, we will not facilitate the merging of personally-identifiable information with non-personally identifiable information collected through GAAF unless we receive your express consent to that merger.

Furthermore, we are hereby notifying You that:

- The specific GAAF feature(s) which we have implemented are:
  - Remarketing with Google Analytics
  - Google Display Network Impression Reporting



- Google Analytics Demographics and Interest Reporting
- We use first-party cookies (such as GAUF cookies) or other first-party identifiers, and third-party cookies (such as advertising cookies) or other third-party identifiers together and that this is done in the ways detailed under the sub-heading 'Use of First- & Third-Party Cookies and Identifiers' below; and
- You can opt-out of the GAUF you use, including through Ads Settings, Ad Settings for mobile apps, or any other available means such as the Google Analytics currently available opt-outs accessible via [tools.google.com/dlpage/gaoptout](https://tools.google.com/dlpage/gaoptout).

## Your rights

You have the right to request access to your personal data which we process. This formal request is made under the DPA and is referred to as a Subject Access Request. If you wish to exercise this right and make a Subject Access Request, you should;

- Put your request in writing; either by Email or by letter.
- Include proof of your identity and address (e.g. a copy of your driving licence or passport, and a recent utility or credit card bill);
- Specify the personal data you want access to, including any account or reference numbers where applicable.

You have the right to require us to correct any inaccuracies in your data free of charge. If you wish to exercise this right, you should:

- Either speak to us via telephone or put your request in writing;
- Provide us with enough information to identify you (e.g. account/order number, username, registration details); and
- Specify the information that is incorrect and what it should be replaced with.

## Data Retention

We will only process your personal data providing you have given your consent for us to do so. Under the provisions of the DPA, our firm's lawful basis for processing personal data is based on a Legitimate Interest.

The legitimate interest relates to a legal requirement for the firm to hold your personal data and financial information on record for up to a total of six years. This six year period satisfies the requirement of our regulator, The Financial Conduct Authority and is also in line with other financial industry retention periods.

## International Transfers

In the normal course of business there may be a need for Air Freedom or any other firm associated to the business, usually when processing an application for credit, personal data would have to be transferred outside of the European Economic Area (EEA)



where those countries do not typically have the same protections and safeguards in place for the protection of personal data to those countries within the EEA.

Air Freedom deal with a number of large, international corporations where data is likely to be transferred in this way. Assurances and processes will always be put in place and considered before any international transfer to a non-EEA country is undertaken to ensure the protection and security of the personal data.

### [Our contact details](#)

We welcome your feedback and questions. If You wish to contact us, please send an email to [info@airfreedom.co.uk](mailto:info@airfreedom.co.uk) or you can write to us at Gareth Bliss, Air Freedom, Enstone Aerodrome, Church Enstone, Oxfordshire, OX7 4NP or call us on 07388 248 171. We may change this Policy from time to time. You should check this policy occasionally to ensure you are aware of the most recent version which will apply each time you deal with us.