

## Privacy Policy

### First things first

At V4 Consumer, we recognise the responsibility to protect and respect your privacy and look after your personal data.

This Privacy Policy explains what personal data we collect, how we use your personal data, reasons we may need to disclose your personal data to others and how we store your personal data securely. For clarity, V4 Consumer is the data controller for your personal data.

Please note\* that this policy is subject to change, so please check our website on a regular basis for any further changes.

**“We do not store credit card details nor do we share financial details with any 3rd parties”**

### Who 'we' are

When we say 'we', 'us' or 'our' in this policy, we are referring to ABI Business Services Ltd who trade under the name of V4 Consumer. Our head office is located at:

V4 Consumer  
Cash's Business Centre  
Unit 2, Ground Floor  
228 Widdrington Road  
Coventry  
West Midlands  
CV1 4PB

### The data we collect from you

We receive information about you when you use our website, complete any of our order forms, if you contact us by telephone, email, live-chat or otherwise in respect of any of our products and services we offer or during the purchase of any such product or service. Additionally, we also collect information from you when you sign up, enter a competition, promotion or customer survey or when you inform us of any other matter.

The personal data that we may collect from you includes your name, business name, title, address, email address, phone numbers, payment information and IP addresses for any Internet services we may provide you. We may also keep details of your visits to our website including, but not limited to traffic data, location data, weblogs and other communication data, we will go into more detail about this further on in this policy. We also retain records of your queries and correspondence, in the event you contact us.

### How do we use this data?

We use information about you in the following ways:

- To process any orders that you wish to place with us;
- To provide you with our wide range of products and services;
- To comply with our contractual obligations, we have with you;
- To enable us to identify you and any accounts you hold with us;
- To enable us to review, develop and improve our products and services to you;
- To provide customer service, including responding to your requests if you contact us with a query or to report a fault;
- To administer accounts, process payments and keep track of billing and payments;
- To detect fraud and to make sure what you have told us is correct;
- To carry out marketing and statistical analysis;
- To review any job applications, we receive;
- To notify you about changes to our website and any services or products we offer;
- To provide you with information about products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes; and
- To inform you of service and price changes.
- Marketing: from time to time we will contact you with information regarding promotions and new products via e-communications. You will have the choice to **opt in or opt out** of receiving such communications by indicating your choice at the sign-up stage. You will also be given the opportunity on every marketing e-communication that we send you to indicate that you no longer wish to receive our direct marketing material.

### Data retention

We will keep your personal data for the duration of the period you are a customer of V4 Consumer. We shall retain your data only for as long as necessary in accordance with applicable laws.

On the closure of your account, we may keep your data for up to 7 years after you have cancelled your services with us. We may not be able to delete your data before this time due to our legal and/or accountancy obligations. We may also keep it for research or statistical purposes. We assure you that your personal data shall only be used for these purposes stated herein.

### Third Parties

Just to make it clear, we do not and never will sell your personal data to third parties for marketing or advertising purposes.

We may pass your personal data to third parties for the provision of services on our behalf (for example processing your payment). However, we will only ever share information about you that is necessary to provide you with a working service. We work closely with a number of third parties (service suppliers, fraud protection & credit reference agencies) and we may receive information from them about you. Please request a copy of our '**Credit Reference and Fraud Prevention Agencies**' document by emailing your request to [support@v4consumer.co.uk](mailto:support@v4consumer.co.uk) for more detail on this.

We may share your information if V4 Consumer are acquired by a third party and therefore your data will be deemed as an asset of the business. In these circumstances, we may disclose your personal data to the prospective buyer of our business, subject to both parties entering and agreeing on appropriate confidentiality undertaking. Similarly, we may also share your personal data if we are under a duty to disclose your information in compliance with any legal obligation or to protect the rights, property, or safety of V4 Consumer, our customers, or others. This includes but is not limited to

exchanging information with other companies and organisations for the purposes of fraud protection, credit risk reduction and dispute policies. However, we will take due steps with the aim of ensuring that your privacy rights continue to be protected.

### Your Rights

You have the right to object to our use of your personal data, or ask us to delete it, remove or stop processing it if there is no need for us to keep it. This is known as your right to erasure. There are legal and accountancy reasons why we will need to keep your data, but please contact us if you believe us to be retaining or using your personal data incorrectly.

In preventing the use or processing of your personal data, it may delay or prevent us from fulfilling our contractual obligations to you. It may also mean we are unable to provide our services to you or process the cancellation of your service.

You have the right to ask us not to process your personal data for marketing purposes. If you choose not to receive marketing communications from us about our products and services, you will have the choice to either opt in or out by ticking the relevant boxes situated on the pages on your sign-up documentation or by emailing [privacynotice@v4consumer.co.uk](mailto:privacynotice@v4consumer.co.uk). When emailing, we ask that you provide us with your V4 account number and customer name within the body of the email.

You also have the right of access to the personal information we hold on you. Please email your requests to [support@v4consumer.co.uk](mailto:support@v4consumer.co.uk)

### Your Obligations

You must maintain the accuracy of your information and ensure all your details, including but not limited to, name, business name, title, address, phone number, e-mail address and payment details are kept up to date with us always. You must do this by notifying us of any changes to your details by contacting our customer services team on Telephone number: **0800 038 5495** or, (if you are a business customer) by writing to us on company headed paper; our address can be found at the beginning of this privacy policy or at the **contact us** section of our website.

### Our Website

This website and its owners take a proactive approach to user privacy and ensure the necessary steps are taken to protect the privacy of its users throughout their visiting experience. This website complies to all UK national laws and requirements for user privacy.

This website uses cookies to better the users experience while visiting the website. Where applicable this website uses a cookie control system allowing the user on their first visit to the website to allow or disallow the use of cookies on their computer / device. This complies with recent legislation requirements for websites to obtain explicit consent from users before leaving behind or reading files such as cookies on a user's computer / device.

Cookies are small files saved to the user's computer's hard drive that track, save and store information about the user's interactions and usage of the website. This allows the website, through its server to provide the users with a tailored experience within this website.

Users are advised that if they wish to deny the use and saving of cookies from this website on to their computers hard drive they should take necessary steps within their web browsers security settings to block all cookies from this website and its external serving vendors.

This website uses tracking software to monitor its visitors to better understand how they use it. This software is provided by Google Analytics which uses cookies to track visitor usage. The software will save a cookie to your computer's hard drive in order to track and monitor your engagement and usage of the website, but will not store, save or collect personal information. You can read Google's privacy policy here for further information <http://www.google.com/privacy.html>.

Other cookies may be stored to your computer's hard drive by external vendors when this website uses referral programs, sponsored links or adverts. Such cookies are used for conversion and referral tracking and typically expire after 30 days, though some may take longer. No personal information is stored, saved or collected.

### External Links

Although this website only looks to include quality, safe and relevant external links, users are advised adopt a policy of caution before clicking any external web links mentioned throughout this website. (External links are clickable text / banner / image links to other websites, similar to; [www.gamma.co.uk](http://www.gamma.co.uk).)

The owners of this website cannot guarantee or verify the contents of any externally linked website despite their best efforts. Users should therefore note they click on external links at their own risk and this website and its owners cannot be held liable for any damages or implications caused by visiting any external links mentioned.

### Adverts and Sponsored Links

This website may contain sponsored links and adverts. These will typically be served through our advertising partners, to whom may have detailed privacy policies relating directly to the adverts they serve.

Clicking on any such adverts will send you to the advertiser's website through a referral program which may use cookies and will track the number of referrals sent from this website. This may include the use of cookies which may in turn be saved on your computer's hard drive. Users should therefore note they click on sponsored external links at their own risk and this website and its owners cannot be held liable for any damages or implications caused by visiting any external links mentioned.

### Social Media Platforms

Communication, engagement and actions taken through external social media platforms that this website and its owners participate on are custom to the terms and conditions as well as the privacy policies held with each social media platform respectively.

Users are advised to use social media platforms wisely and communicate / engage upon them with due care and caution in regard to their own privacy and personal details. Neither the website nor its owners will ever ask for personal or sensitive information through social media platforms and

encourage users wishing to discuss sensitive details to contact them through primary communication channels such as by telephone or email.

This website may use social sharing buttons which help share web content directly from web pages to the social media platform in question. Users are advised before using such social sharing buttons that they do so at their own discretion and note that the social media platform may track and save your request to share a web page respectively through your social media platform account.

### Shortened Links in Social Media

This website and its owners through their social media platform accounts may share web links to relevant web pages. By default, some social media platforms shorten lengthy URLs (this is an example: <http://bit.ly/zyVUBo>).

Users are advised to take caution and good judgement before clicking any shortened URLs published on social media platforms by this website and its owners. Despite the best efforts to ensure only genuine URLs are published many social media platforms are prone to spam and hacking and therefore this website and its owners cannot be held liable for any damages or implications caused by visiting any shortened links.

### International Data Transfer

Though all the information you provide to us is securely stored on our servers within the European Economic Area (EEA) our dedicated customer services team are based at our Kolkata offices in India. It is therefore necessary for the performance of our contract between yourself (or your business) and V4 Consumer that your data is transferred outside of the EEA. Please be assured that your information is processed in a very secure manner and in accordance with Irish and EU law on data protection.

### Credit Reference and Fraud Prevention Agencies

#### **Q: What is a credit reference agency?**

**A:** Credit reference agencies (CRAs) collect and maintain information on consumers' and businesses' credit behaviour, on behalf of organisations in the UK.

#### **Q: What is a fraud prevention agency?**

**A:** Fraud Prevention Agencies (FPAs) collect, maintain and share, information on known and suspected fraudulent activity. Some CRAs also act as FPAs.

#### **Q: Why do you use them when I have applied to your organisation?**

**A:** Although you have applied to us and we will check our own records, we will also contact CRAs to

get information on your credit behaviour with other organisations. This will help us make the best possible assessment of your overall situation before we make a decision.

**Q: Where do they get the information?**

**A:** • publicly available information:

- The Electoral Register from Local Authorities
  - County Court Judgments from Registry Trust.
  - Bankruptcy (and other similar orders) from the Insolvency Service.
- Fraud information may also come from fraud prevention agencies.
  - Credit information comes from information on applications to banks, building societies, credit card companies etc. and also from the conduct of those accounts.

**Q: How will I know if my information is to be sent to a CRA or FPA?**

**A:** You will be told when you apply for an account if your application data is to be supplied. The next section of this privacy policy will tell you how, when and why we will search at CRAs and FPAs and what we will do with the information we obtain from them. We will also tell you if we plan to send payment history information on you or your business, if you have one, to CRAs. You can ask at any time the name of CRAs and FPAs.

**Q: Why is my data used in this way?**

**A:** We and other organisations want to make the best possible decisions we can, in order to make sure that you, or your business, will be able to repay us. Some organisations may also use the information to check your identity. In this way we can ensure that we all make responsible decisions. At the same time, we also want to make decisions quickly and easily and, by using up to date information, provided electronically, we are able to make the most reliable and fair decisions possible.

**Q: Who controls what such agencies are allowed to do with my data?**

**A:** All organisations that collect and process personal data are now regulated by the General Data Protection regulations(GPDR) brought live in May 2018, overseen by the Information Commissioner's Office (ICO). All credit reference agencies are in regular dialogue with the Commissioner. Use of the Electoral Register is controlled under the Representation of the People Act 2000.

**Q: Can just anyone look at my data held at credit reference agencies?**

**A:** No, access to your information is very strictly controlled and only those that are entitled to do so, may see it. Usually that will only be with your agreement or (very occasionally) if there is a legal requirement.

**A condensed guide to the use of your personal information by V4 Consumer and at Credit Reference and Fraud Prevention Agencies**

1) When you apply to us to open an account, this organisation will check the following records about you and others (see 2 below)

a) Our own;

b) Those at credit reference agencies (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. They supply to us both public (including the electoral register) and shared credit and fraud prevention information.

c) Those at fraud prevention agencies (FPAs).

We will make checks such as; assessing this application for credit and verifying identities to prevent and detect crime and money laundering. We may also make periodic searches at CRAs and FPAs to manage your account with us.

2) If you are making a joint application or tell us that you have a spouse or financial associate, we will link your records together so you must be sure that you have their agreement to disclose information about them. CRAs 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.

3) Information on applications will be sent to CRAs and will be recorded by them. Where you borrow from us, we will give details of your accounts and how you manage it/them to CRAs. 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 and FPAs to perform similar checks and to trace your whereabouts and recover debts that you owe. Records remain on file for 6 years after they are closed, whether settled by you or defaulted.

4) If you give us false or inaccurate information and we suspect or identify fraud we will record this and may also pass this information to FPAs and other organisations involved in crime and fraud prevention.

5) If you have borrowed from us and do not make payments that you owe us, we will trace your whereabouts and recover debts.

6) We and other organisations may access and use from other countries the information recorded by fraud prevention agencies.

7) Your data may also be used for other purposes for which you give your specific permission or, in very limited circumstances, when required by law or where permitted under the terms of the General Data Protection Regulation 2018.

#### How to find out more

You can contact the CRAs currently operating in the UK; the information they hold may not be the same so it is worth contacting them all. They may charge you a small statutory fee.

**Call Credit**, Consumer Services Team, PO Box 491, Leeds, LS3 1WZ or call 0870 0601414

**Equifax PLC**, Credit File Advice Centre, PO Box 3001, Bradford, BD1 5US or call 0870 010 0583 or log on to [www.myequifax.co.uk](http://www.myequifax.co.uk)

**Experian**, Consumer Help Service, PO Box 8000, Nottingham NG80 7WF or call 0844 4818000 or log on to [www.experian.co.uk](http://www.experian.co.uk)

Please read this section very carefully, it will vary from lender to lender

#### What we do:

##### 1) When you apply to us to open an account, this organisation will:

a) Check our own records for information on:

- i) Your personal accounts;
- ii) and, if you have one, your financial associates' [\[1\]](#) personal accounts;
- iii) if you are an owner, director or partner in a small business [\[2\]](#) we may also check on your business accounts.

b) Search at credit reference agencies for information on:

- i. Your personal accounts:
- ii. and, if you are making a joint application now or have ever done the following we will check your financial associates' personal accounts as well:
  - previously made joint applications
  - have joint account(s);
  - are financially linked [\[3\]](#);
- iii) [very occasionally if there is insufficient information to enable us to assist you, we may also use information about other members of your family [\[4\]](#);

iv) if you are a director or partner in a small business we may also check on your business accounts;

c) Search at fraud prevention agencies for information on you and any addresses at which you have lived and on your business (if you have one)

**2) What we do with the information you supply to us as part of the application:**

a) Information that is supplied to us will be sent to the credit reference agencies.

b) If you are making a joint application or tell us that you have a spouse or financial associate, we will:

i) Search, link and/or record information at credit reference agencies about you both.

ii) Link any individual identified as your financial associate, in our own records

iii) Take both your and their information into account in future applications by either or both of you.

iv) Continue this linking until the account closes, or is changed to a sole account and one of you notifies us that you are no longer linked.

**So you must be sure that you have their agreement to disclose information about them.**

c) If you give us false or inaccurate information and we suspect or identify fraud we will record this and may also pass this information to fraud prevention agencies and other organisations involved in crime and fraud prevention.

d) Your data may also be used by us to offer you other products, but only if you have given your permission. That will be on the front of any form that you have completed.

**3) With the information that we obtain we will:**

a) Assess this application for credit and/or;

b) Check details on applications for credit and credit related or other facilities

c) Verify your identity and the identity of your spouse, partner or other directors/partners and/or;

d) Undertake checks for the prevention and detection of crime, fraud and/or money laundering.

e) We may use scoring methods to assess this application and to verify your identity.

f) Manage your personal and/or business account (if you have one) with ourselves.

g) Undertake periodic statistical analysis or testing to ensure the accuracy of existing and future products and services.

h) Any or all of these processes may be automated.

#### **4) What we do when you have an account:**

a) Where you use our services & pay for them in arrears, borrow or may borrow from us, we will give details of your personal and/or business account (if you have one), including names and parties to the account and how you manage it/them to credit reference agencies.

b) If you borrow and do not repay in full and on time, we will tell credit reference agencies.

c) We may make periodic searches of our own group records and at credit reference agencies to manage your account with us, including whether to make credit available or to continue or extend existing credit. We may also check at fraud prevention agencies to prevent or detect fraud.

d) If you have borrowed from us and do not make payments that you owe us, we will trace your whereabouts and recover debts

#### **What Credit Reference and Fraud Prevention Agencies do**

#### **5) When credit reference agencies receive a search from us they will:**

a) Place a search “footprint” on your credit file whether or not this application proceeds. If the search was for a credit application the record of that search (but not the name of the organisation that carried it out) may be seen by other organisations when you apply for credit in the future.

b) Link together the records of you and anyone that you have advised is your financial associate including previous and subsequent names of parties to the account. Links between financial associates will remain on your and their files until such time as you or your partner successfully files for a disassociation<sup>[5]</sup> with the credit reference agencies.

#### **6) Supply to us:**

c) Credit information such as previous applications and the conduct of the accounts in your name and of your associate(s) (if there is a link between you – see 1b above) and/or your business accounts (if you have one).

d) Public information such as County Court Judgments (CCJs) and bankruptcies.

e) Electoral Register information.

f) Fraud prevention information.

#### **7) When information is supplied by us, to them, on your account(s):**

a) Credit reference agencies will record the details that are supplied on your personal and/or business account (if you have one) including any previous and subsequent names that have been used by the account holders and how you/they manage it/them.

b) If you borrow and do not repay in full and on time, credit reference agencies will record the outstanding debt.

c) Records shared with credit reference agencies remain on file for 6 years after they are closed, whether settled by you or defaulted.

**8) How your data will NOT be used by credit reference agencies:**

- a) It will not be used to create a blacklist.
- b) It will not be used by the credit reference agency to make a decision.

**9) How your data WILL be used by credit reference agencies:**

a) The information which we and other organisations provide to the credit reference agencies about you, your financial associates and your business (if you have one) may be supplied by credit reference agencies to other organisations and used by them to

- i) Prevent crime, fraud and money laundering by, for example checking details provided on applications for credit and credit related or other facilities
- ii) Check the operation of credit and credit-related accounts
- iii) Verify your identity if you or your financial associate applies for other facilities.
- iv) Make decisions on credit and credit related services about you, your partner, other members of your household or your business.
- v) Manage your personal, your partner's and/or business (if you have one) credit or credit related account or other facilities.
- vi) Trace your whereabouts and recover debts that you owe.
- vii) Undertake statistical analysis and system testing.

**10) How your data may be used by fraud prevention agencies:**

a) The information which we provide to the fraud prevention agencies about you, your financial associates and your business (if you have one) may be supplied by fraud prevention agencies to other organisations and used by them and us to:

- i) Prevent crime, fraud and money laundering by, for example;
  - (1) Checking details provided on applications for credit and credit related or other facilities
  - (2) Managing credit and credit related accounts or facilities
  - (3) Cross Checking details provided on proposals and claims for all types of insurance.
  - (4) Checking details on applications for jobs or when checked as part of employment

b) Verify your identity if you or your financial associate applies for other facilities including all types of insurance proposals and claims.

c) Trace your whereabouts and recover debts that you owe.

d) Conduct other checks to prevent or detect fraud

e) We and other organisations may access and use from other countries the information recorded by fraud prevention agencies.

f) Undertake statistical analysis and system testing.

**11) Your data may also be used to offer you other products, but only where permitted**

[1] A financial associate will be someone with whom you have a personal relationship that creates a joint financial unit in a similar way to a married couple. You will have been living at the same address at the time. It is not intended to include temporary arrangements such as students or rented flat sharers or business relationships.

[2] A small business is defined as an organisation which might be sole trader, partnership or a limited company that has three or less partners or directors.

[3] Credit reference agencies may link together the records of people that are part of a financial unit. They may do this when people are known to be linked, such as being married or have jointly applied for credit or have joint accounts. They may also link people together if they, themselves, state that they are financially linked.

[4] Exclude this if the application is being processed as opted-out.

[5] Financial associates (see 1 a) iii) may “break the link” between them if their circumstances change such that they are no longer a financial unit. They should apply for their credit file from a credit reference agency and file for a “disassociation”.

### Data Breaches

In the event of a data breach, we shall ensure that our obligations under applicable data protection laws are complied with where necessary.

### Contact Us

Please e-mail any questions or comments you have about our privacy policy to us at [privacynotice@V4consumer.co.uk](mailto:privacynotice@V4consumer.co.uk)

### Complaints

Should you wish, you have the right to make a complaint about how we process your personal data to the Information Commissioner's office (ICO):

<https://ico.org.uk/concerns/>

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Tel: 0303 123 1113



**ABI Business Services Limited, trading as V4 Consumer**

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#maketheshift