

Bluestone Asset Finance
Privacy Policy

Definitions

For the purposes of this Policy:

“**BCH Group**” shall mean Bluestone Consolidated Holdings Limited and its Subsidiaries

“**Bluestone, Company, we, us and our**” shall mean Bluestone Asset Management (Ireland) Limited, Bluestone Asset Finance Ireland Limited and Bluestone Finance 1 Limited

“**DPA**” shall mean the Data Protection Acts 1988 and 2003

“**EEA**” shall mean the European Economic Area

“**Policy**” shall mean this Privacy Policy

“**Subsidiaries**” shall mean all companies which are owned and/or controlled either directly or indirectly by Bluestone Consolidated Holdings Limited

“**Website**” shall mean the website www.bluestoneam.ie

Bluestone takes privacy very seriously. It is very important to us to maintain the confidentiality of any personal details or other information you may provide us with. This Policy sets out what sort of information we collect and hold about you, how that information is collected, how we use your information and how information may be corrected and/or updated.

1. Information we may collect

We collect information about you through your use of the Website and when you contact us, e.g. via telephone, letter or email. We also receive information about you from public data sources or third parties such as credit reference agencies, or from companies that we have either purchased your account from or are collecting on behalf of.

Typically, the information that we will collect will include your name, address, telephone number, date of birth, email address and any information relating to your account and your financial circumstances. Telephone conversations may be recorded for quality and training purposes.

2. Uses made of the information

Any information received will be held electronically for the purposes of enabling us to provide you with a helpful and effective service.

We use information held about you in the following ways:

- where you have requested information or asked us to contact you, we may use your personal information to gather the information requested and respond to your request or to contact you if you have asked us to do so;
- to process payments made via our Website and to service, update and administer your account;
- to provide you with a helpful and effective service;
- to make decisions relating to lease or hire applications;
- for debt collection purposes and other business and client communication purposes;
- to prevent money laundering and/or fraud;

- to help us take decisions about you and your account; and
- to fulfil our obligations to our clients, for example we may provide them with details of your payment history, account usage, changes of name and address.

We do not share any of your personal information with any other unauthorised parties. We do not sell, lease or rent our data lists or generate any revenue from third parties through the sale of personal information generated by this Website.

To maintain security of customer information, we maintain physical, electronic, managerial and procedural safeguards to protect the privacy of your personal and account information. Information gathered will only be used for our own business and client communication purposes. You may request that we update or correct your data at any time by contacting us on 01644 8900 or by e-mail at info@bluestoneam.ie

3. Disclosure of your information

We may disclose your personal information to any member of the BCH Group.

We may disclose your personal information to third parties:

- if we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation;
- to employees, sub-contractors and third parties who act for us for the purposes set out in this policy, or for other purposes approved by you, or to those who are contracted to provide us with services, such as administration support or website services. For example, if you make a payment via our pay online pages your details will be passed to our payment service provider for processing;
- to credit reference agencies to ensure responsible lending and the accuracy of data. We may provide such agencies with information about the behaviour of your account including changes to your personal information, such as previous or subsequent names. Other lenders may use this to make decisions on future applications for credit;
- in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets; and
- if we have (or believe we have) a duty to do so, or the law allows us to.

4. Our Privacy Pledge

- We will only collect and use your information where it is lawful to do so and for legitimate business reasons.
- We will be transparent in our dealings with you and will inform you about how we will gather and use your information.
- If your information has been collected by us for a particular purpose we will not use it for anything else unless you have been notified and (where necessary) your permission obtained.
- We will not ask for more information than we need for the purposes for which we are collecting it.
- We will not collect sensitive information about you without your specific consent.
- If you tell us that your details have changed we will update our records promptly.
- We will implement and adhere to information retention policies relating to your information and will ensure that your information is securely disposed of at the end of the appropriate retention period.
- We will observe the rights granted to you under applicable privacy and data protection laws and will ensure that queries relating to privacy issues are promptly and transparently dealt with.

- We will train our staff on their privacy obligations.
- We will ensure we have appropriate physical and technological security measures to protect your information.
- We will ensure that when we outsource any processes the supplier also has appropriate security measures in place.

5. Cookies

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work (or work more efficiently). Although cookies contain identifying information, they do not contain any information that identifies you personally, but they allow us to recognise you when you return to our Website. We can then use that information to personalise your web browsing experience, track and report on website usage and performance, and for statistical and security purposes.

You can change your browser settings so that cookies are not accepted. If you do this, you may lose some of the functionality of this Website.

For further information about cookies please go to: www.aboutcookies.org.

6. Access to information

The DPA gives you the right to access information we hold about you.

You can make such a request for access to a copy of your personal information by writing to us at:

Data Protection Officer,
Bluestone Asset Management,
3 Ely Place,
Dublin 2

Please ensure you enclose the required €6.35 fee, by cheque payable to “Bluestone Asset Management (Ireland) Limited”, and provide sufficient information for us to identify you. Please also provide details of the type of information you would like us to supply.

7. Consent and Changes

By using this Website, telephoning, writing or emailing us, you consent to the collection and use of your personal information as outlined in this Policy.

This Policy is subject to regular review and may be updated from time to time.

8. Transfer of data outside of the EEA

The data that we collect from you may be transferred to and stored at a destination outside of the EEA and/or processed by staff operating outside of the EEA. We will ensure that any such transfer or processing takes place strictly in accordance with the requirements of the DPA.

9. Links to other websites

Our Website contains links to other websites. This information is supplied in good faith, in case it is of use to you or other users of our Website. We are not responsible for the information contained on or accessible through those websites - but please let us know if a link is not working. Your access and use of such websites remains solely at your own risk. You should be aware that the privacy policies of any external website may differ from our own.

10. Is Bluestone registered on the Data Protection Register?

Bluestone Asset Finance Ireland Limited is registered under reference number 14938/A. Bluestone Asset Management (Ireland) Limited is registered under reference number 12581/A.

To view these details please visit the website of the Data Protection Commissioner at <http://www.dataprotection.ie/>

11. Contact us

If you have a query about this Policy you can contact us in the following ways:

Data Protection Officer,
Bluestone Asset Management,
3 Ely Place,
Dublin 2

info@bluestoneam.ie