MOBILIZE FINANCIAL SERVICES

Mobilize Financial Services Ireland
Cedar House 13 Joyce Way Park West
Business Park, Dublin 12, D12 RW59

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Mobilize Financial Services Data Privacy Statement

Introduction

In order to provide our services to you, it is necessary for us to collect and process a certain amount of your personal information. The purpose of this Statement is to explain how we collect information about you, how we use it and your rights in respect of how we engage with it.

Who we are

When we talk about Mobilize Financial Services, or "us" or "we" in this Statement, we are referring to RCI Banque Société Anonyme, Mobilize Financial Services. RCI Banque Société Anonyme is a French registered company with registration number 306523358. The registered company number of its Irish branch is 906613, the name of the branch Mobilize Financial Services and its registered Irish address is Cedar House 13 Joyce Way Park West Business Park, Dublin 12, D12 RW59.

Mobilize Financial Services shall be the Data Controller in respect of the information you provide to us.

How we collect your information

In general we collect personal information from our customers through engaging directly with them.

We also collect personal information through the Central Credit Register (CCR). The CCR provides us with names of customers, addresses and previous addresses, dates of birth and credit histories. This information is only used for underwriting purposes

We may also obtain certain personal information about you from sources outside our business which may include a Group Company, Cedar Motors Limited (Renault Ireland), the Renault Ireland Dealer network or other third parties. For the purposes of this statement, Group Company means a company which is a Subsidiary or Holding Company of RCI Banque Société Anonyme or any Subsidiary of such Holding Company from time to time (and for this purpose Subsidiary and Holding Company have the meanings given to them respectively in sections 7 and 8 of the Companies Act 2014).

We will collect, hold and use the following categories of personal information about you from the above-mentioned parties: your name, date of birth, contact details and details about your car (e.g. new vehicle or used vehicle, VIN and/or BIN, vehicle brand, model code, catalogue price, sales price, date of sale, dealer code, dealer name and contact details, car registration number).

How we use your information and our legal basis for doing so

PURPOSE FOR PROCESSING YOUR INFORMATION	LEGAL BASIS
To provide Mobilize Financial Services products and services	This use of your information is necessary for the performance of our contract with you.
To manage Mobilize Financial Services business including management reporting and strategic planning	This use of your information is necessary for our legitimate business interest in managing our resources and promoting and advertising our business. In identifying this basis, we have weighed our legitimate interest as a business against your rights and freedoms and determined that it will not unfairly impact your rights. If you would like further information on how we balanced these interests you can contact us using the details below. **Please note that you have a right to object to processing of your personal data where that processing is carried on for our legitimate interest.**
To share information about you with a Group Company, the Renault Ireland Dealer Network and other third parties for the purposes of: • analysis to inform our marketing strategy, and to enhance and personalise your customer experience; • creating a profile of you to determine what products and services you may be interested in; • managing our customer relationship with you and provide you with customer service (including advising you about the products and services that we are providing to you in response to a request from you about this or corresponding or communicating with you);	

• marketing activities (other than where we rely on your consent); • reporting on activity and sales performance; and • carrying out studies to improve customers' knowledge and business experience.[1]	
To provide information on the services available to customers	
To improve our service quality by reviewing our performance and for training purposes	
To buy and/or sell assets	
To carry out non-automated credit scoring and credit management, including collecting and enforcing debts and arrears.	
To manage and administer legal and compliance affairs to fulfil our legal obligations for the provision of financial and insurance products.	This use of your information is necessary in order for us to comply with any legal or regulatory obligations.
To engage in certain types of direct marketing communications (for us, Cedar Motors Limited, Renault SAS, the Renault Ireland Dealer network and the other third parties listed in the "Who we share your information with"). This may include sending customer satisfaction, market research surveys or other direct marketing communications to you.	This use of your information is done on the basis that you have consented to such use. **Where we use your information on the basis of your consent, you have the right to subsequently withdraw that consent at any time (by contacting us using the details below).**

Who we share your information with

We share your personal data with the following recipients:

i. the Central Register;
ii. our legal advisors;
iii. debt collection agencies;
iv. insurance providers (where you have purchased an insurance product through Mobilize Financial Services);
v. direct marketing companies engaged by Mobilize Financial Services for marketing campaigns
vi. other members of our group companies
vii. Cedar Motors Limited (Renault Ireland)
viii. a purchaser or potential purchaser of our business or otherwise in the event of a merger, re-organisation or similar event;
ix. An Garda Síochána, fraud prevention and identity authentication entities, other law enforcement agencies, government and tax authorities in Ireland or abroad in order to detect, investigate and prevent crime (please note that fraud prevention agencies may also enable law enforcement agencies to access and use your information to detect, investigate, and prevent crime)
x. courts in Ireland 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; and]
xi. If you are a Renault Ireland approved network customer: please note that your data may be shared with dealers within the Renault Ireland approved network (including their business partners) and that such dealers may be replaced or changed from time to time. The new authorised dealer may contact you to inform you of any such change and to continue to provide Renault services to you. Please see the below URL which highlights the current list of active Renault Ireland Network approved dealers: https://www.renault.ie/find-a-dealer.html. If you have any issue with this link you can visit https://www.renault.ie/
xii. Companies and consultants providing services to us (e.g., including but not limited to, mail service providers, IT service providers who provide and maintain our systems, auditors). Those third parties providing services to us will only use your information to provide those services to us.
xiii. Insurance providers, such as Wrisk (where you have purchased or given contact consent for insurance products offered through Mobilize Financial Services

Transfers of Data outside the EEA

As much as possible, your data is hosted on servers located in the European Economic Area (EEA). However, since some of our service providers are located in countries outside the EEA, your personal data is processed in these countries. Some of these countries may have different regulations on the personal data of that of the European Union. In such a case, we pay particular attention to ensuring that this transfer is made in accordance with the applicable regulations and put in place safeguards ensuring a level of protection of your privacy and your fundamental rights equivalent to that offered by the European Union (notably through the use of the European Commission's Standard Contractual Clauses). On simple request made to the address mentioned in the section "What are your rights", we can provide you with more information on these transfers (in particular the standard contractual clauses of the European Commission).

How long we hold your information

We will keep your personal information for as long as is necessary to carry out the purposes set out above, in accordance with the following data retention procedures:

i. Where we have obtained personal data for quotation purposes or application purposes but we do not enter into a contract in respect of that personal data, we will generally retain such personal data for no longer than 1 year after the date it was received; and

ii. Where we enter into a contract, we will retain the personal data obtained pursuant to that contract for as long as is necessary to:

- perform our obligations under the contract;
- comply with our legal obligations (e.g.' the anti-money laundering regulations); and
- exercise our legal rights and defend legal claims.

Typically this will require that we hold such data for a period of 7 years from the date on which that the contract is terminated.

If you have any further queries in relation to our data retention procedures please contact our Data Protection Officer at the address given below.

Your rights in respect of your information

You have several rights in relation to your personal data. You have a right to:

- Request access to your personal information (commonly known as a 'data subject access request'). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it;
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected;
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below);
- Object to processing of your personal information where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes;
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it;
- Request the transfer of your personal information to another party.
- Withdraw your consent to our processing of your information at any time. This will not affect the lawfulness of processing based on consent before its withdrawal; and
- Lodge a complaint with the Office of the Data Protection Commissioner (if you are unhappy with how your personal data is being handled). If you wish to exercise any of your rights in this regard please contact us using the details below

When we use solely automated decision-making processes in respect of your information

In order to provide our services and perform our contractual obligations we use a process of automated credit risk scoring. This is limited to the underwriting stage of your finance application. We use this process of automated credit risk scoring to analyse the data you have provided to us, together with information we have obtained from the CCR, in order to ascertain certain aspects of the credit we offer you and your ability to repay any loans. This helps us to make fair and responsible lending

decisions.where we use solely automated decision-making you will always be entitled to have a person review the decision so that you can contest it and put your point of view and circumstances forward.

Our basis for requiring information

If Mobilize Financial Services cannot process the necessary personal information, it may be difficult, impossible, or unlawful for us to give you advice on or provide you with our services.

If Mobilize Financial Services ask you to provide your personal information, we will explain whether it is a legal or contractual requirement that we use such information and if you do not wish to give your information to us, Mobilize Financial Services will explain the consequences based on the specific information concerned.

Contact Details

If you have any queries relation to any of the above information please contact us on the below address: Email: dataprotectionofficer@rcibanque.com

Post: Data Protection Officer RCI
Bank and Services
API FR UZS 000 021 15
Rue D'uzès
75002 Paris
France

Mobilize Financial Services, trading as RCI Bank and Services, Renault Bank, Dacia Bank, RCI Banque Branch Ireland, Renault Finance and Dacia Finance is authorised and regulated by the French banking authority and supervised by the Central Bank of Ireland for conduct of business purposes.