

Privacy Policy

Your personal data is data which, by itself or in conjunction with other data available to us, can be used to identify you. Affiniture Cards Ltd, trading as Diners Club International, is the data controller, which means that we will determine the purposes for processing your personal data and the manner in which processing is carried out. This Privacy Policy describes how we will use your personal data.

If you have any queries on how we use your personal data or want to exercise any of your rights under the General Data Protection Regulation (GDPR), you may contact our Customer Services Team by writing to **Diners Club International, Unit 8 Wilkinson Business Park, Clywedog Road South, Wrexham Industrial Estate, Wrexham LL13 9AE**, or by dialling **0345 862 2935** if you are calling from within the UK or **+44 1244 470 910** if you are calling from overseas.

Where there is more than one person associated with your account, such as supplementary cardholders, the Privacy Policy applies to each person separately.

Affiniture Cards Ltd is registered as a data controller with the Information Commissioner's Office. Our registration number is Z3111845.

Links to other websites

We may provide you with links to websites which are not under the control of Affiniture Cards Ltd. The links provided are solely for your convenience and do not represent any endorsement or recommendation by Affiniture Cards Ltd. We accept no responsibility or liability for the contents of these websites or for any loss arising from any contract entered into with any of these websites.

The types of personal data we collect and use

Whether or not you become a customer, we will use your personal data for the reasons set out below and if you become a customer we will use it to manage your account. We will collect most of this information directly from you during your application journey. However, we may also obtain some information from third parties which is described in full later on in this Policy.

The personal data we may collect includes:

- Your full name and contact details, such as your current and previous postal addresses, your email address, and your home, business and mobile telephone numbers;
- Your date of birth and age;
- Information from credit reference or fraud prevention agencies, electoral roll, court records of debt judgements (such as CCJs and bankruptcies), and other publicly available information, as well as information on any financial associations you may have;
- Biometric data, such as fingerprints and voice recordings;
- Details of your purchases made using your account;

Monitoring of communications

Subject to applicable laws, we may record and monitor any calls, emails, text messages, social media messages and any other communications that you make or send to us. We do this for regulatory compliance, quality control and staff training, crime prevention and detection, and when you need to see a record of what has been said.

We may also monitor the activity on your account where necessary and do so based on our legitimate interests or our legal obligations.

The legal basis and purposes for using your personal data

We will process your personal data:

1. To perform the contract as agreed with you, e.g.:
 - a) To decide whether to enter into the contract with you;
 - b) To manage and perform the contract;
 - c) To update your records; and
 - d) To contact you about your account(s), including to trace your whereabouts in order to recover a debt.
2. For our own legitimate interests, e.g.:
 - a) For good governance, accounting, managing and auditing of our business operations;
 - b) To search credit reference agencies;
 - c) To record and monitor any calls, emails, text messages, social media messages and any other communications that you make or send to us;
 - d) To monitor the activity on your account; and
 - e) To send you marketing messages where you have consented to this.
3. To comply with a legal obligation, e.g.:
 - a) When you exercise any of your rights under data protection legislation;
 - b) For compliance with legal and regulatory requirements;
 - c) For the establishment and defence of legal rights;
 - d) For activities related to the prevention, detection and investigation of crime;
 - e) To verify your identity, make credit, fraud prevention and anti-money laundering checks; and
 - f) To record and monitor any calls, emails, text messages, social media messages and any other communications that you make or send to us.
4. Upon receipt of your consent, e.g.:
 - a) To provide you with the payment service for which we have agreed to deliver;
 - b) When we process any special categories of personal data about you at your request, such as your racial or ethnic origin, political opinions, and religious beliefs; and
 - c) To send you marketing messages where you have consented to this.

You are free to withdraw your consent at any time. You can do this by contacting our Customer Services Team. However, please note that a consequence of your withdrawal is that we may not be able to provide certain services to or carry out specific tasks for you.

Sharing your personal data

Subject to applicable data protection laws, we may share your personal data with:

- Other companies within the Affiniture Group of companies;
- Sub-contractors and other persons who help us to provide your products and services;
- Our legal and other professional advisors, including our auditors;
- Fraud prevention agencies, credit reference agencies, and debt collection agencies when we open your account and periodically during the lifetime of your account;
- Government bodies and agencies, e.g. HMRC, the Financial Conduct Authority and the Information Commissioner's Office;
- Courts, to comply with legal requirements, and for the administration of justice;
- Other parties connected with your account, such as guarantors and other people named on the application;
- Payment systems (Diners Club International and Mastercard) if we issue cards linked to your account; and
- Anyone else where we have your consent, as required by law, in an emergency in order to protect your vital interests, and if we restructure or sell our business or its assets or have a merger or re-organisation.

We may also disclose your personal data, in the event that we sell any business or assets, to the prospective buyer of such business or assets as part of a necessary due diligence exercise. In addition, if Affiniture Cards Limited or substantially all of its assets are acquired by a third party, the personal data held by us about you will be one of the transferred assets and we may disclose your personal data to that third party.

International transfers

We may transfer your data outside of the UK and the European Economic Area. While some countries have adequate protections for personal data, for other countries we will need to take steps to ensure appropriate safeguards are in place before we transfer your personal data. Your privacy and protection are important to us, and we will not transfer your personal data until we are satisfied that your personal data will be protected.

Identity verification and fraud prevention checks

The personal information we have collected from you may be shared with fraud prevention agencies who will use it to prevent fraud and money-laundering and to verify your identity. If fraud is detected, you could be refused certain services, finance or employment. Further details of how your information will be used by us and these fraud prevention agencies, and your data protection rights are available from Diners Club International on request.

Credit reference checks

If you have applied for an account with Affiniture, we will perform credit and identity checks in order to process your application. We carry out these checks by providing your personal data to the credit reference agency and they will provide us information about you. When we carry out a search with the credit reference agency, they will place a footprint on your credit file.

Dependent on the type of search carried out, they will either leave a soft footprint, which has no effect on your credit score and other lenders are unable to see this, or a hard footprint, which is visible to other lenders and may affect your ability to get credit elsewhere. When carrying out searches which leave a hard footprint, we will only do so where you have agreed or requested us to proceed with your application for credit. This footprint will appear on your credit file even if your application for credit is unsuccessful.

We may continue to share information with the credit reference agency during the lifetime of the account, including the details of your accounts and how you manage them, and whether you have not paid the balance in full or on time. Records remain in file for 6 years after the account is closed, whether it has been settled by you or has been defaulted.

We may also continue to obtain information from the credit reference agencies during the lifetime of your account in order to manage your account, including any future credit limit increases.

Affiniture uses the credit reference agency Equifax Ltd, and the ways in which they process personal information is explained via the Credit reference Agency Information Notice (CRAIN) which can be accessed via the following link - equifax.co.uk/crain.

Your marketing preferences and related searches

We will use your address, phone numbers and email address to contact you according to your preferences. You can change your preferences or unsubscribe at any time by contacting our Customer Services Team.

If you don't want information about other products and services, and you haven't told us this before, you can let us know by contacting our Customer Services Team.

Automated decision making and processing

Automated decision making involves processing your personal data without human intervention. This means that we may automatically decide that you pose a fraud or money laundering risk, or if our processing reveals your behaviour

to be consistent with that of known fraudsters or money launderers, is inconsistent with your previous behaviour, or there appears to be a deliberate attempt to hide your true identity. You have rights in relation to automated decision making. If you would like to know more, please contact our Customer Services Team.

Where your personal data is being processed in relation to your application for credit, acceptance or rejection of your application will not solely depend on the results of an automated credit scoring process.

The retention of your data

We will retain your personal data for the following reasons:

- **In case of queries.** We will retain your personal data for as long as necessary to deal with your queries, e.g. if your application is unsuccessful;
- **In case of claims.** We will retain your personal data for as long as you might legally bring claims against us; and
- **In accordance with legal and regulatory requirements.** We will retain your personal data after your account has been closed in order to meet legal and regulatory requirements.

Your rights under data protection legislation

Your rights under GDPR are as follows:

- You have the right to be informed about our processing of your personal data;
- You have the right to have your personal data corrected if it is inaccurate and to have incomplete personal data completed;
- You have the right to object to us processing your personal data;
- You have the right to have your personal data erased, otherwise known as the 'right to be forgotten';
- You have the right to request access to the personal data we hold about you, and information on how we process it, commonly known as a 'data subject access request';
- You have the right to move, copy or transfer your personal data ('data portability'); and
- You have rights in relation to automated decision making, including profiling.

You also have the right to complain to the Information Commissioner's Office. It has enforcement powers and can investigate compliance with data protection laws. More information about the Information Commissioner's Office can be found on their website - ico.org.uk.

Data anonymisation and aggregation

Your personal data may be converted into statistical or aggregated data which means that you cannot be identified. This anonymised data will then be used to produce statistical reports and may be shared and used in all the ways described in this Policy.

Changes to our Privacy Policy

Any changes we may make to our Privacy Policy in the future will be posted on this website and, where appropriate, notified to you by e-mail or post.