

# Frasers Plus

## Privacy Policy

We view the security of our customers data as paramount. Any personal data about you and from which you can be identified is stored securely and confidentially and is processed in accordance with applicable legislation (including the UK General Data Protection Regulation, the Data Protection Act 2018, and the Privacy and Electronic Communications (EC Directive) Regulations 2003) and this Frasers Plus Privacy Policy, which sets out what personal data we process when you interact with us and how we use your personal data in respect of the Frasers Plus credit product and related products and services (such as the Frasers Plus Loyalty Scheme or the Frasers Plus app) ("**Frasers Plus**").

We may change this Frasers Plus Privacy Policy from time to time – when we do, where appropriate, we will inform you via email.

### Who we are

Frasers Plus is operated by Frasers Group Financial Services Ltd ("**Frasers**", "**we**", "**us**", "**our**"), whose registered address is Express House, Petre Road, Clayton Business Park, Accrington, Lancashire, BB5 5JB. Our company number is 00718151. We are the regulated lender for Frasers Plus, which means we are authorised to make, or take assignments of, regulated consumer lending as part of our regular business activities.

Frasers Group Financial Services Ltd is the data controller in respect of personal data collected in connection with Frasers Plus (except personal data collected in connection with the Payment Instrument, as defined below). Our ICO registration number is ZB553878. If you have any queries regarding our use of personal data or this Frasers Plus Privacy Policy, you can email [data.protection@frasers.group](mailto:data.protection@frasers.group) or write to Data Protection, Express House, Petre Road, Clayton Business Park, Accrington, Lancashire, BB5 5JB.

Transact Payments Limited ("**TPL**") is a third party who assists us in providing you Frasers Plus. TPL is the issuer of the quick-response code or the authorisation via the Frasers Plus app which you may use to authorise a purchase made using Frasers Plus (the "**Payment Instrument**") and is the data controller for the personal data which you provide in relation to the Payment Instrument only. This is covered in a separate TPL Privacy Policy, owned by TPL, and reproduced at Annex 1 below (the "**TPL Privacy Policy**"). TPL is an e-money institution, authorised and regulated by the Gibraltar Financial Services Commission. TPL's registered office address is 6.20 World Trade Center, 6 Bayside Road, Gibraltar, GX11 1AA and its registered company number is 108217. Please note that Frasers and TPL operate as separate, independent data controllers. If you have any queries regarding TPL's use of your personal data or the Payment Instrument, please contact TPL directly as set out in the TPL Privacy Policy.

## **Data we may hold about you**

In order to provide you with Frasers Plus, we will collect personal data such as:

- identification information such as your first name, last name, title, username (or similar identifier), date of birth, gender, job title and visual identifiers (for example photos of you from your ID);
- contact details such as your address, email address, and telephone number;
- financial information and employment data such as salary, bank statements, account details and credit referencing information;
- where it is reasonably necessary, we may process special categories of personal data that are particularly sensitive, such as information about your health, to deliver our services to you in the most appropriate way;
- profile data such as your password, purchase information, spending patterns, your interests and preferences, your feedback and survey responses and social media data (for example handles);
- technical data such as your IP address, login data, time zone information, browser type and version, operating system and platform and technology and devices used for accessing Frasers Plus;
- usage data about how you use our products and services;
- call data such as call logs and recordings; and
- marketing and communications data.

We may also collect and process aggregated data, such as statistical or demographic data. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific app feature. We may use this data for the same purposes as set out below.

In some cases, the personal data we process is provided to us directly by you, for example, the personal data you share with us in your application for Frasers Plus, in the context of the Loyalty Scheme or when corresponding with us. We may also collect data from you indirectly, for example the technical data listed above as you interact with the Frasers Plus website and app. In other cases, we also receive personal data about you from other sources - for example, from third parties such as the credit reference agencies mentioned in 'How we might share your personal data' below, or from public sources such as Companies House or the Electoral Register.

## **How we may use your personal data**

We may use your personal data in the following ways:

- to register you for the Loyalty Scheme, including to set you up with, maintain and update your Loyalty Scheme account (e.g. such as a change of address or change in your marketing preferences) and to provide, run and administer the Loyalty Scheme;
- to provide, run, administer and maintain the Frasers Plus product, your Frasers Plus account and any related products or services (e.g. the Frasers Plus app), including where you may have needs that we need to consider in how we provide our services;
- to make assessments of your eligibility for Frasers Plus;
- to make lending decisions in accordance with our internal policies, principles, and regulatory obligations;
- to meet our legal, regulatory and compliance requirements (e.g. in relation to financial crime and anti-money laundering);
- to process payments and handle transactions;
- for debt tracing and recovery;
- to detect and prevent fraudulent transactions and/or any other criminal activity (we may pass your details to a third party to carry out these functions);
- to provide information to, and receive information from, credit reference agencies and other third parties who help us to operate and provide Frasers Plus;
- to answer your questions, and deal with enquiries or complaints;
- to communicate with you about your account;
- to tell you about similar products and services, or products and services that you ask us to send you information about and to keep in touch with you regarding your marketing preferences, in accordance with 'Marketing and promotional communications' below;
- to undertake customer satisfaction surveys and other similar research;
- to analyse and improve the Loyalty Scheme, the Frasers Plus product, your Frasers Plus account and any related products or services (e.g. the Frasers Plus app);
- to support the sale, transfer or merger of part or all of our business or assets;
- to manage our business;
- where relevant, for the establishment, exercise or defence of legal claims; and
- to keep our network safe and secure.

## Automated decision-making

Please note that in some cases, we may undertake automated decision-making (including profiling), meaning that a decision about you is made by automated means and without human involvement. We may make a decision either entirely or partially based on automated processes. This automated decision-making occurs predominantly during the application process for Frasers Plus. We take into account the personal data you provide on your application for Frasers Plus, information we receive from credit reference agencies (“**CRAs**”) and fraud prevention agencies (“**FPAs**”), and other information we may hold about you (for example, any prior applications and your spending and payment history), and we use automated means to:

- assign you a score, based on our own internal criteria, which helps us to assess whether it is suitable for us to offer Frasers Plus to you (for example, in determining your credit worthiness or affordability);
- assess any risks of fraud and money laundering (for example, checking whether you are on any sanctions lists); and
- make a decision as to whether to accept or decline your application for Frasers Plus.

We use automated decision-making processes because it helps us to:

- make more informed, responsible and efficient decisions about lending;
- grant you fair and unbiased treatment based on consistent and uniform criteria;
- reduce the potential harm derived from human error, personal bias, discrimination and abuse of power; and
- reduce the risk of you failing to meet your obligations under your agreement with us (for example, failing to meet payments).

Decisions made via automated decision-making may have legal or other significant effects on you – for instance, a significant effect might be that we may decline your application for Frasers Plus. Where you are subject to automated decision-making processes, you are entitled to exercise specific rights aimed at preventing or limiting the potential effects of the automated decisions taken. For example, you have the right to obtain an explanation about any decision taken as a result of automated decision-making, express your point of view or challenge such decision, or request human intervention. Please contact us in accordance with ‘How to contact us or complain’ below if you want to find out more about our automated decision-making.

## Legal basis for using your personal data

We will only use your personal data when applicable legislation allows us to. We rely on the following lawful bases to process your personal data:

- where you have given us consent to use it – you are able to withdraw your consent at any time, by contacting us in accordance with ‘How to contact us or complain’ below;
- where it is necessary to perform an agreement we have entered into with you, or to take steps at your request prior to entering into an agreement with you;
- where necessary for compliance with our legal obligations; or
- where it is necessary for our legitimate interests (or those of a third party), including in managing and operating our business, where these are not overridden by your rights and interests.

Where we process **special categories** of personal data about you, such as information about your health, we need a further condition for processing as well as one of the lawful bases set out above. We may need to process limited amount of your health data to establish and record if you have specific needs that we should consider, to make sure your interactions with us are appropriate and fair. We will process this data based on **substantial public interest**, specifically to **protect the economic wellbeing of an individual at economic risk** who is aged 18 or over.

## How long we keep your personal data

We will not keep your personal data for any purpose(s) for longer than is necessary and we will only retain the relevant personal data that is necessary in relation to the purpose.

When you apply for Frasers Plus:

- if your application is successful, we will retain the personal data provided in your application, for registering an account for Frasers Plus, and relating to your usage of Frasers Plus, for so long as that account remains in existence and for 7 years thereafter.
- if your application is not successful, or you choose not to register an account for Frasers Plus, we will retain the personal data for 7 years.

We will retain the personal data provided for registering an account for the Loyalty Scheme and collected during your use of the Loyalty Scheme so long as that account remains in existence and for 7 years thereafter.

In the case of any contact you may have with our customer services department, we will retain those details for as long as is necessary to resolve your query and for 7 years after the query is closed.

If we are legally required or if it is reasonably necessary to meet regulatory requirements, resolve disputes, respond to any questions, complaints or claims made by you or on your behalf, prevent fraud and abuse, keep records required by law or enforce our terms and conditions, we may also retain some of your personal data for a limited period of time, even after you have closed your account.

We will retain your personal data for a short time beyond the specified retention period, to allow for information to be reviewed and any deletion to take place.

## **How we might share your personal data**

We may routinely share your personal data with other companies in the Frasers Group, which means the companies who are ultimately owned or controlled by Frasers Group plc.

We may also share your personal data with carefully selected third parties who assist us in providing you with the Loyalty Scheme or Frasers Plus. This includes the following types of third party:

- CRAs which perform credit and identity checks on you to assist us in processing your application for Frasers Plus including for purposes such as assessing your creditworthiness, verifying the accuracy of the data you have provided to us, managing your account and tracing and recovering debts;
- FPAs which perform identity checks on you during your application for Frasers Plus and when you place new orders using your Frasers Plus account;
- Debt collection, purchasing and management agencies, which assist us in managing and recovering debts (for example if you default on repayments);
- Open Banking providers which will process your banking details as part the opening of your Frasers Plus account and ongoing account management;
- Communications and customer relationship management service providers which support our interactions with you (for example in sending you service or marketing communications);
- Analytics and research service providers who assist us in profiling, analysing and interpreting data;
- Retailers who offer the Frasers Plus product or accept the Frasers Plus Loyalty Scheme ("**Frasers Plus Retailers**");

- Our (and the Frasers Group's) technology and payments services providers (including TPL);
- Our (and the Frasers Group's) professional advisers, including, without limitation, our insurers; and
- Our (and the Frasers Group's) suppliers, business partners and sub-contractors.

We will only share your personal data with third parties where it is necessary for them to provide us with the services we need.

In the event that we were to sell our business or assets, we may disclose your personal data to any prospective/actual purchaser and/or their advisers.

We may disclose and exchange information with law enforcement agencies, government authorities and regulatory bodies to comply with our legal and regulatory obligations.

We may also disclose your personal data where we are subject to a legal obligation to do so, in connection with the prevention or detection of crime, for the purpose of establishing, exercising or defending our legal rights, or where we consider that we receive a valid request for disclosure. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

The personal information we have collected from you will 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, can be found by visiting the following website [www.cifas.org.uk/fpn](http://www.cifas.org.uk/fpn).

Please note that third party websites/providers have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you provide or submit any personal data to these websites/providers.

## **Where your personal data is held**

Information may be held at our offices and in our IT systems and those of the Frasers Group as well as by its and our professional advisers, service providers, suppliers, business partners and sub-contractors.

Some of these third parties may be based outside the UK or European Economic Area (“EEA”). For more information, including on how we safeguard your personal information when this occurs, see below: ‘International transfers of your personal data’.

## **Keeping your personal data secure**

We have appropriate security measures to prevent personal data from being accidentally lost, or used or accessed unlawfully.

We limit access to your personal data to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

## **Marketing and promotional communications**

We and members of the Frasers Group and Frasers Plus Retailers may use your personal data to send you updates (depending on your stated preferences, by email, post, mobile, telephone and/or through other digital means including social media platforms) about each of our products and services, including exclusive offers, promotions or new products and services.

We will always treat your personal information with the utmost respect and never sell or share it with other organisations outside the Frasers Group or Frasers Plus Retailers for their marketing purposes.

You have the right to opt out of receiving promotional communications at any time:

1. Through the Frasers Plus app:
  - Log into the app
  - Tap the person icon at the bottom right of the screen
  - Tap on Settings
  - Slide On/Off to change marketing consent
2. By contacting Frasers Plus customer services by web chat or email via the Frasers Plus app.
3. By writing to us at the address set out in 'How to contact us or complain' below.

We may ask you to confirm or update your marketing preferences if you instruct us to provide further products and services in the future, or if there are changes in the law, regulation, or the structure of our business.

Please note that you may continue to receive communications for a short period after changing your preferences while our systems are fully updated.

## International transfers of your personal data

The personal data that we process may be transferred to, and stored outside, the UK or EEA. It may also be processed by staff operating outside the UK or EEA who work for us or for one of our suppliers or third party providers. Where we do so, the third country's data protection laws will have been approved as adequate by the UK government/relevant UK authority or European Commission (as applicable), or other applicable safeguards are in place. If you wish to receive a copy of these safeguards, please contact us in accordance with 'How to contact us or complain' below.

## Your rights

You have certain rights in relation to personal data we hold about you. Details of these rights are set out below. You can exercise these rights by contacting us in accordance with 'How to contact us or complain' below.

<b>Right to Object to or Restrict Processing</b>	In some circumstances, you have the right to object to our processing of your personal data – e.g. if we are processing your data on the basis of our legitimate interests and there are no compelling legitimate grounds for our processing which override your rights and interests. You also have the right to object to use of your personal data for direct marketing purposes (for more information, see 'Marketing and promotional communications' above). If you have a complaint about how we have handled your personal data, you may be able to ask us to restrict how we use your personal data while your complaint is resolved.
<b>Right to Withdraw Consent</b>	Where you have consented to us using your personal data, you can withdraw that consent at any time.
<b>Right of Erasure</b>	In some circumstances you can ask us to erase your personal data – e.g. if you withdraw your consent, it is no longer necessary for us to use your personal data, you object to the use of your personal data and we don't have a good reason to continue to use it, or we haven't handled your personal data in accordance with our obligations.
<b>Right of Access</b>	You have the right, with some exceptions, to ask us to provide a copy of any personal data we hold about you.
<b>Right of Correction or Completion</b>	If the information we hold about you is inaccurate or incomplete, you can notify us and ask us to correct or supplement it.

**Right of Data Portability**

You have the right to ask that we transfer the personal data you gave us to another organisation, or to you, in certain circumstances.

**Right not to be Subject to Automated Decision-making**

You have the right not to be subject to an automated decision made by us which produces legal or other significant effects on you. For more information, see 'Automated decision-making' above.

To exercise these rights, we need to be suitably satisfied of your identity and so may request you provide identification documents or confirm other details we may hold about you (such as a recent delivery reference or address).

## How to contact us or complain

If you have any queries or concerns regarding how we use your personal data, please email [data.protection@frasers.group](mailto:data.protection@frasers.group) or alternatively write to: Data Protection, Express House, Petre Road, Clayton Business Park, Accrington, Lancashire, BB5 5JB.

If you are not happy with our response, you can contact the Information Commissioners Office: <https://ico.org.uk>. The ICO's address is Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF, and its helpline number is 0303 123 1113.

## Annex 1: TPL Privacy Policy

Version: 2.0

This policy explains when and why we collect personal information about you in accordance with the operation of your Frasers Plus account, how we use your information, the conditions under which we may disclose your information to others and how we keep it secure.

TPL is committed to safeguarding the privacy of your information. By "your data", "your personal data", and "your information" we mean any personal data about you which you or third-parties provide to us.

We may change this Policy from time to time so please check this page regularly to ensure that you're happy with any changes.

### Who are we?

Your Frasers Plus account is governed by your running-account credit agreement with Frasers Group Financial Services Ltd. We, Transact Payments Limited ("TPL", "we", "our" or "us"), are the issuer of either your quick-response code ("QR Code") or an authorisation code ("Authorisation Code") via the Frasers Plus mobile application with which you may authorise purchases, as described in your credit agreement. TPL is an independent Data Controller for the personal data which you provide when using your Frasers Plus account in relation to the either a QR Code or an Authorisation Code only. TPL is an e-money institution, authorised and regulated by the Gibraltar Financial Services Commission. Our registered office address is 6.20 World Trade Center, 6 Bayside Road, Gibraltar, GX11 1AA and our registered company number is 108217.

Frasers Group Financial Services Ltd is the Program Manager and lender for Frasers Plus and is an independent Data Controller for any personal data which you provide which is not related to either a QR Code or an Authorisation Code. This is covered in the separate Frasers Plus privacy policy, available above. Frasers Group Financial Services Ltd is incorporated and

registered in England and Wales with registered office at Express House, Petre Road, Clayton Business Park, Accrington, Lancashire, BB5 5JB and company registration number 00718151.

### **How do we collect your personal data?**

We collect information about you when you request that either a QR Code or an Authorisation Code is issued. We also collect information when you use either your QR Code or an Authorisation Code to make transactions. We may also process information from Program Manager, other third-party payment partners and service providers. We also obtain information from third-parties (such as fraud prevention agencies) who may check your personal data against any information listed on an Electoral Register and/or other databases. When we process your personal data we rely on legal bases in accordance with data protection law and this privacy policy. For more information see: ***On what legal basis do we process your personal data?***

### **On what legal basis do we process your personal data?**

#### Legal/Regulatory

We may process your personal data to comply with our legal or regulatory obligations.

#### Legitimate Interests

We, or a third-party, may have a legitimate interest to process your personal data, for example:

- to issue you with either a QR Code or an Authorisation Code;
- to analyse and improve the security of our business; or
- to anonymise personal data and subsequently use anonymized information.

### **What type of personal data is collected from you?**

For you to be issued and use either a QR Code or an Authorisation Code, we, or our partners, agents or service providers, collect the following information from you: full name, physical address, email address, country of residence, date of birth, transactional and payment data, account identification number and customer identification number. We will collect this information on a weekly basis from Frasers Group Financial Services Ltd.

### **How is your personal data used?**

We use your personal data to:

- process your request for either a QR Code or an Authorisation Code; verify your identity; and create either your QR Code or an Authorisation Code.

- process your financial payments; process the correspondence between us, our partners, agents or service providers; monitor your account for fraud; and provide a secure internet environment for the transmission of our services.
- comply with our regulatory requirements, including anti-money laundering obligations.
- improve our services, including creating anonymous data from your personal data for analytical use, including for the purposes of training, testing and system development.

### **Who do we share your information with?**

When we use third-party service partners, we have a contract in place that requires them to keep your information secure and confidential.

We may receive and pass your information to the following categories of entity:

- identity verification agencies to undertake required verification, regulatory and fraud prevention checks;
- information security services organisations, web application hosting providers, mail support providers, network backup service providers and software/platform developers;
- document destruction providers;
- Mastercard, Visa, digital payment service partners or any third-party providers involved in processing the financial transactions that you make;
- anyone to whom we lawfully transfer or may transfer our rights and duties under this agreement;
- any third-party as a result of any restructure, sale or acquisition of TPL or any associated entity, provided that any recipient uses your information for the same purposes as it was originally supplied to us and/or used by us.
- regulatory and law enforcement authorities, whether they are outside or inside of the United Kingdom (UK) or European Economic Area (EEA), where the law requires us to do so.

### **Sending personal data overseas**

To deliver services to you, it is sometimes necessary for us to share your personal information outside the UK/Gibraltar e.g.:

- with service providers located outside these areas;
- if you are based outside these areas;
- where there is an international dimension to the services we are providing to you.
- These transfers are subject to special rules under Gibraltar data protection law.

These countries do not have the same data protection laws as Gibraltar. We will, however, ensure the transfer complies with data protection law and all personal information will be secure. We will send your data to countries where the Gibraltar Government has made a ruling of adequacy, meaning that they have ruled that the legislative framework in the country provides an adequate level of data protection for your personal information. You can find out more about adequacy regulations [here](#) and [here](#).

Where we send your data to a country where no adequacy decision has been made, our standard practice is to use standard data protection contract clauses that have been approved by the United Kingdom government and/or the European Commission. You can obtain a copy of the European Commission's document [here](#) and the UK's document [here](#).

If you would like further information, please contact our Data Protection Officer on the details below.

### **How long do we store your personal data?**

We will store your information for a period of five years after the date of your last transaction in order that we can comply with our obligations under applicable legislation such as anti-money laundering and anti-fraud regulations. If any applicable legislation or changes to this require us to retain your data for a longer or shorter period of time, we shall retain it for that period. We will not retain your data for longer than is necessary.

### **Your rights regarding your personal data?**

You have certain rights regarding the personal data which we process:

- You may request a copy of some or all of it.
- You may ask us to rectify any data which we hold which you believe to be inaccurate.
- You may ask us to erase your personal data (where applicable).
- You may ask us to restrict the processing of your personal data.
- You may object to the processing of your personal data (where applicable).
- You may ask for the right to data portability.
- If you would like us to carry out any of the above, please email your request to the Data Protection Officer [at DPO@transactpay.com](mailto:DPO@transactpay.com).

### **How is your information protected?**

We recognise the importance of protecting and managing your personal data. Any personal data we process will be treated with appropriate care and security.

These are some of the security measures we have in place:

- We use a variety of physical and technical measures to keep your personal data safe.
- We have detailed information and security policies to ensure the confidentiality, integrity, and availability of information.
- Your data is stored securely on computer systems with control over access on a limited basis.
- Our staff receives data protection and information security training on a regular basis.
- We use encryption to protect data at rest and anonymization where applicable.
- We have adequate security controls to protect our IT infrastructure and staff computers including but not limited to Identity and Access Management, Firewalls, VPN, Antivirus, Advanced Email Threat Protection and more.
- We conduct regular audits such as PCI-DSS to ensure we are following adequate security controls to protect your data.

While we take all reasonable steps to ensure that your personal data will be kept secure from unauthorised access, we cannot guarantee it will be secure during transmission by you to the applicable mobile app, website or other services over the internet. However, once we receive your information, we make appropriate efforts to ensure its security on our systems.

## **Complaints**

We hope that our Data Protection Officer can resolve any query or concern you may raise about our use of your personal information.

You have a right to lodge a complaint with the supervisory authority in the country of your residence or where any alleged infringement of data protection laws occurred. The supervisory authority in Gibraltar is the Gibraltar Regulatory Authority. Their contact details are as follows:

Gibraltar Regulatory Authority,

2nd floor, Eurotowers 4, 1 Europort Road, Gibraltar.

(+350) 20074636/(+350) 20072166 [info@gra.gi](mailto:info@gra.gi)

## **Other websites**

Our website may contain links to other websites. This privacy policy applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website.

### **Changes to our Privacy Policy**

We keep our Privacy Policy under review and we regularly update it to keep up with business demands and privacy regulation. We will inform you about any such changes. This TPL Privacy Policy was last updated on 7<sup>th</sup> July 2025.

### **How to contact us**

If you have any questions about our Privacy Policy or the personal information which we hold about you or, please send an email to our Data Protection Officer at [DPO@transactpay.com](mailto:DPO@transactpay.com).