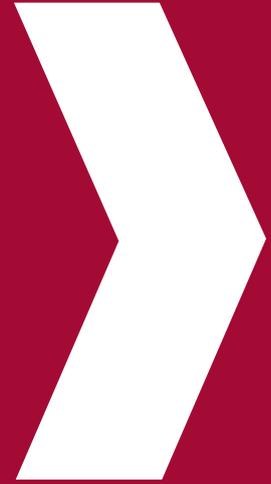


Equifax Data Sharing Policy



Introduction

This policy explains Equifax's practices and expectations when we share personal credit data with other organisations. The policy is intended to help us achieve a rational and consistent approach to managing data, and to help our data providers and users better understand the standards we expect them to adhere to. It was developed to meet the standards outlined in guidance issued by the Information Commissioner's Office.

What is data sharing?

Under this policy, the term 'data sharing' means the disclosures of personal credit data by Equifax to another organisation. It does not apply to disclosures of personal data to data subjects nor to disclosures of data that cannot identify an individual.

Purpose of sharing data

Equifax is a credit reference agency. We collect credit data from various sources and make it available to our customers, who use it in connection with credit, business and statutory activities.

Equifax is a member of the Steering Committee on Reciprocity (SCOR), which was created by the UK finance industry to set and administer clear guidelines on the use and sharing of credit and related personal data. The guidelines are known as the Principles of Reciprocity (PoR).

The PoR cover the collection and sharing of consumer credit data about individuals located in the UK, and set standards for how data use and sharing is recorded. The fundamental principle in the PoR is that credit data may only be shared for uses associated with the prevention of over-commitment, bad debt, fraud and money laundering, and to support debt recovery and debtor tracing. More information about SCOR and the PoR is available at <http://www.scoronline.co.uk/>.

Personal credit data is used primarily by businesses to assess and manage risks of granting consumer credit. However, it is also frequently used to verify the identity, age and residency of data subjects, to identify and track fraudulent activities, to combat money laundering and to help recover payment of outstanding debts. Government and quasi-government bodies may use personal credit data as a tool to verify that data subjects are entitled to certain benefits and to recover unpaid taxes and similar debts.

Systematic sharing

Equifax will routinely share personal credit data on an ongoing basis with organisations that we have accepted as customers.

Equifax will only accept an organisation as a customer if we are satisfied that the organisation has a legitimate, legal purpose for using personal credit data and is able to adequately protect any personal data that we share.

Before sharing data with a customer, we require them to agree in writing to specific terms and conditions that address the following:

- responsibilities to comply at all times with applicable regulations
- which data we will share and how it will be formatted
- the purposes for which the customer may use data
- how long the customer may keep the data
- conditions and restrictions for sharing it with other organisations
- security procedures we will use to protect the data
- responsibilities to respond to subject access requests and Information Commissioner's Office inquiries
- procedures to correct inaccuracies and update data
- procedures to review compliance with the agreement
- sanctions for breaching the agreement

One-off sharing

Very rarely, Equifax may share personal credit data with an organisation that is not a regular customer. For example, we may be compelled to share data by a court or tribunal.

Before sharing data on a one-off basis, Equifax will:

- seek professional and ethical advice about the proposed sharing
- take necessary steps to confirm the identity of the organisation requesting the data and the legality and legitimacy of the request
- require clarification if the request is too vague
- seek appropriate conditions to protect the data after it is shared

Anytime Equifax decides to share data on a one-off basis, we will record:

- what data was shared
- which organisation the data was shared with
- the date the data was shared
- how the data was shared
- our justification for sharing the data
- whether the data was shared with or without the data subject's consent
- any conditions agreed to protect the data after it was shared

Consent

In general, Equifax shares personal credit data with organisations that have the data subject's consent to request, receive and use it for the particular purpose(s) for which it will be used. An organisation may obtain a data subject's consent in a variety of ways, but we encourage them to use a method that is clear and which can be recorded.

When Equifax shares data with an organisation based on the data subject's consent, we require the organisation to keep a record of the consent and to provide a copy of it to us upon request. We may request confirmation of consent from an organisation as part of a routine audit or in response to a specific inquiry or concern raised by a data subject.

In some circumstances, the data subject's consent may not be required. Instead, an organisation may request and use data after notifying the individual of their intention. For example, Equifax will share personal data to allow an organisation to comply with its obligations under the Money Laundering Regulations as long as the organisation notifies the data subject that it will request and use their data for this purpose.

It is important to keep in mind that there are some circumstances in which personal data may be used and shared without consent or notice. The conditions for doing so are described in Schedule 2 of the Data Protection Act. If an organisation has a legal right or obligation (e.g. under legislation or at common law) to request, receive and use it without the data subject's consent and without notifying them, Equifax may share the data as long as the other conditions of the Data Protection Act and this policy are met.

Record keeping

Each time Equifax shares personal credit data with an organisation, we record the name of that organisation, what data was shared, and the date the data was shared.

Unless prohibited from doing so by law, Equifax provides these data sharing records for the past 12 months to the data subject when they request a copy of their credit report or make an access request under the Data Protection Act.

- Sharing for debt tracing and collection is recorded for 24 months

Safe transmission

Equifax uses a variety of technical, administrative and physical ways to keep personal credit data safe when we share it. For example, we require organisations to use pre-arranged secure channels to request and receive data. We regularly review and update our security protocols to ensure that they continue to meet or exceed established best practices at all times.

More information

More information about how Equifax collects, uses and protects personal data is available in our [Personal Data Management Policy](#) and [Privacy Policy](#). If you have any questions or concerns, you may contact Equifax's Head of Compliance & Regulatory Affairs by post at:

Equifax Customer Relations
PO Box 1140
Bradford
BD1 5US

Attention: Head of Compliance & Regulatory Affairs