

The Avant Money Privacy Notice

**Data Privacy is important to us at Avant Money.
Please read this important document carefully.**

This is the Privacy Notice of Avantcard DAC of Dublin Road, Carrick on Shannon, Co Leitrim. Avant Money and Avantcard are the registered trading names of Avantcard DAC in the Republic of Ireland and are referred to throughout this document as “Avant Money”, “we”, “us”, “our”. Avantcard DAC is a subsidiary of Bankinter Consumer Finance E.F.C, S.A. which is part of the Bankinter group (the 'Bankinter Group').

This Privacy Notice applies to all products underwritten by Avant Money including Avant Money mortgage, credit card and loan products and Chill Money and An Post Money credit card and loan products.

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1. Policies of other service providers

While you explore the services offered through the Avant Money hosted websites, Avant Money App, and websites owned by other members of the Bankinter Group, please be alert for and review any specialised privacy notices and terms of use applicable to particular products, websites or Apps, or portions of them, as they may differ depending on group, company, product or service. Please be aware that if you were introduced to us by a broker, credit intermediary, other online retailers, partners, third party internet sites, and third-party services accessible through the Avant Money website, they will have separate privacy and data collection policies and practices which are independent of and may differ from Avant Money's policies and practices. Avant Money is not responsible or liable for these independent policies and practices. It is your responsibility to review them and decide whether such policies and practices protect your rights to your satisfaction before proceeding.

If you ask us to share your information with or allow third party providers access to your information, for example, Account Information Service Providers (AISPs), please ensure you review their privacy notices and terms of use.

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2. Your privacy is important to us

We are committed to providing you with products that are suitable to your needs and are backed by consistently top-quality service. We also take our obligations under data protection law very seriously. As a Data Controller, we are obliged to provide you with information on how we collect, use and share your personal data. This Privacy Notice explains how we will handle your personal information in order to provide you with our products and services and gives you the information you need to decide whether or not to provide your personal information to us.

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3. Security

We will take measures to ensure that personal data will be processed in a manner that ensures appropriate security and confidentiality of the personal data, including for the prevention of unauthorised access to or use of personal data and the equipment used for the processing. We have appropriate technical and organisational measures to ensure an appropriate level of security, including:

- the pseudonymisation and encryption of personal data;
- verification of the identity of our customers through the use of personal passwords or other information before assisting them;
- the use of vigilant protection measures in order to protect our customers' accounts from fraudulent use;
- the ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services;
- the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident; and

- a process for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing.

We ensure that anyone acting on our behalf that has access to personal data does not process the personal data except on instructions from us.

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4. What we collect and how long we will keep it for

The personal information that Avant Money, any member of the Bankinter Group, credit intermediaries and third parties appointed by us or acting on our behalf, collects about you may include the following:

Personal Information	Retention Period
Information in connection with your application for one of our products, which includes your name, address, date of birth, PPS number, employment details, email address, phone numbers, marital status, number of dependents, anti-money laundering documentation (e.g. copies of official identification and household bills), bank account details, income and expenditures, assets, debts, and credit history.	Avant Money must retain these records for six years from the date on which we ceased to provide any product or service to you. This is aligned to the requirements of the Consumer Protection Code 2012.
Information gathered which may include your credit card details, any phone number you call us from, details of the financial transactions processed by us, our credit intermediaries or third parties appointed by us.	Avant Money must retain these records for six years from the date on which we ceased to provide any product or service to you. This is aligned to the requirements of the Consumer Protection Code 2012.
Information gathered about you which may include electronic details about you, your computer or your internet protocol address.	Avant Money will retain this information for 12 months from the date the electronic details about you, your computer or your internet protocol address were gathered.
Information we gather about you through your interactions with us, credit intermediaries and third parties appointed by us, which may include your debit card details.	Avant Money will normally retain your debit card details for 30 days following the completion of debit card transactions that you authorise us to complete; however, if a dispute arises, we may need to retain until such time as that dispute is resolved.
Information received from searches made in your name with credit reference and fraud prevention agencies.	Avant Money must retain these records for six years from the date on which we ceased to provide any product or service to you. This is aligned to the requirements of the Consumer Protection Code 2012.

Personal Information	Retention Period
Information you provide about others or others provide us about you e.g. information provided as part of a joint application.	Avant Money must retain these records for six years from the date on which we ceased to provide any product or service to you. This is aligned to the requirements of the Consumer Protection Code 2012.
Information about you which includes special categories of personal data such as but not limited to health or criminal convictions.	Avant Money must retain these records for six years from the date on which we ceased to provide any product or service to you. This is aligned to the requirements of the Consumer Protection Code 2012.
Information provided in situations where you are a beneficiary, guarantor, director or representative of one of our customers or where your circumstance has a material impact on our customers and their ability to abide by the terms and conditions of their credit agreement.	Avant Money must retain these records for six years from the date on which we ceased to provide any product or service to you. This is aligned to the requirements of the Consumer Protection Code 2012.
Information about any and all applications underwritten by Avant Money or any and all accounts which you, or any member of your household, hold with or through us.	Avant Money must retain these records for six years from the date on which we ceased to provide any product or service to you. This is aligned to the requirements of the Consumer Protection Code 2012.
Information received from anyone who is allowed to provide information about you.	Avant Money must retain these records for six years from the date on which we ceased to provide any product or service to you. This is aligned to the requirements of the Consumer Protection Code 2012.
Information provided when registering for the Avant Money App (user ID and passwords).	Avant Money must retain this information for as long as you are a user of the Avant Money App.

You are not under a statutory or contractual duty to provide us with any personal information; however, the personal information requested from you is necessary to allow Avant Money to properly and appropriately provide or administer its products and services. If you do not provide us with sufficient information, we may be unable to provide such products or services to you.

If you provide us with the personal information of an individual, for example, a joint applicant, additional cardholder or representative, you must ensure that the individual is informed and that they have given you permission to share their personal information.

Your personal information will be stored by Avant Money on a computerised database and/or in any other secure manner. Any personal information which you provide when you apply for a

product or hold an account underwritten by us will be used in accordance with the terms and conditions of the particular agreement which you have entered into with us and in accordance with the General Data Protection Regulation (2016/679) and the Data Protection Act 2018 (together “Data Protection Law”).

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5. How we use Personal Information

Avant Money uses your personal information for the following purposes:

Purpose	Legal Basis
To assess any application for credit that you make to us directly or through a credit intermediary or third party acting on our behalf. This includes applications for a mortgage, credit card or loan product.	This is necessary before we can enter into a contract with you and to fulfil our contractual obligations to you.
When you are completing an application for credit, we may need to contact you by phone (including your place of employment), SMS or email in relation to that application. We may also need to contact you by phone, SMS or email to administer any account that you hold with us.	This is necessary before we can enter into a contract with you and to fulfil our contractual obligations to you. This is may also be necessary, in some cases, to comply with Irish law. We also rely on your consent (if you have given it) to call you at your place of employment. You can withdraw this consent at any time online by going to the settings menu of My Avant Money or by contacting us.
When you use the Avant Money app, we may send you notifications to keep you informed of your activity in the application.	We rely on your consent to send these push notifications. You can withdraw you consent at any time by logging into the Avant Money app and disabling notifications.
When you are completing an application for credit, we may use the services of an image recognition service provider to assist us with the extraction of data from the documents you provide.	This is necessary to achieve our legitimate commercial interest in operating our business efficiently and processing applications quicker.
To carry out searches (for anti-money laundering, credit history and legal purposes) and to disclose information to credit reference agencies for the purpose of assessing applications for credit and credit related services and for on-going credit review.	This is necessary before we can enter into a contract with you, to fulfil our obligations once we have entered into a contract with you, and in some cases to comply with Irish law. This is also necessary to achieve our legitimate interest in promoting greater financial stability by supporting a full and accurate assessment of

Purpose	Legal Basis
	loan applications, aiding in the avoidance of over-indebtedness, assisting in lowering the cost of credit, complying with and supporting compliance with legal and regulatory requirements, enabling more consistent, faster decision-making in the provision of credit and assisting in fraud prevention.
To provide you with an open banking option as part of your credit application. Open banking is a secure way to give us access to your financial information through an AISP.	This is necessary to achieve our legitimate commercial interest in operating our business efficiently and processing applications quicker.
To generate a financial profile through categorisation of the data extracted from the financial information provided as part of your credit application.	This is necessary to achieve our legitimate commercial interest in operating our business efficiently and processing applications quicker.
To administer the services or products that we supply to you and administer and manage any accounts that have a co-borrower, including processing the co-borrower's personal data and disclosing your personal data to the co-borrower, if necessary, in relation to these accounts.	This is necessary to fulfil our contractual obligations to you.
To establish and confirm how you operate account(s) underwritten by Avant Money and to ensure compliance with any applicable terms and conditions. This includes where you become an Avant Money customer following the purchase by us of your card, loan and/or mortgage account from another financial service provider; we will need to process your personal information to allow us to plan and prepare for the proper transfer of your account from your previous financial services provider's systems to our systems.	This is necessary to fulfil our contractual obligations to you, and to achieve our legitimate commercial interest in operating our business efficiently.
To review and analyse your financial position with us and where required, complete a restructuring of your account with us. This may include requesting and processing additional personal data from you, e.g., details regarding your income and expenditure.	This is necessary to fulfil our contractual obligations to you in terms of any financial products you have with us and in making any decisions in respect of further requests for products that you may make. This is also necessary to achieve our legitimate commercial interest in operating our business efficiently.

Purpose	Legal Basis
<p>To provide your personal information to third party processors and contractors who provide services to and for Avant Money, such as IT systems providers and professional services firms (e.g. brokers, mortgage services, auditors and external legal counsel).</p>	<p>This is necessary to fulfil our contractual obligations to you.</p>
<p>To provide your personal information to debt collection agencies who act on behalf of Avant Money.</p>	<p>Where it becomes necessary, this is to achieve our legitimate commercial interest in ensuring we are paid for our products and services in accordance with the contract we have agreed with you.</p>
<p>To prevent and detect fraud, or other unlawful activity and to trace those responsible.</p>	<p>This is necessary to fulfil our contractual obligations to you, and in some cases to comply with Irish law.</p>
<p>To comply with any applicable laws and regulations, for example:</p> <ul style="list-style-type: none"> • To provide you with statutory and legal information and communications • To ensure we have up to date identification documentation on account opening and thereafter in order to prevent Money Laundering, Fraud and Terrorist Financing • To screen applications made to us to comply with international laws in order to prevent and combat terrorism and other criminal activities • To improve and fix data quality and ensure accurate reporting to the Central Credit Register • To ensure identification of any representatives acting on your behalf • To provide reports and returns requested by regulatory bodies • To fulfil any court orders related to your account • To monitor your use of our online services including My Avant Money, the Avant Money App or other services to prevent fraud • To assess your suitability and the affordability of a particular product as 	<p>This is necessary to comply with Irish law.</p>

Purpose	Legal Basis
<p>required under the Consumer Protection Code To provide information to Revenue when requested.</p>	
<p>To carry out statistical analysis and market research to analyse, monitor and improve our business or to instruct a third party to perform this on our behalf.</p>	<p>This is necessary to achieve our legitimate commercial interest in operating our business efficiently.</p>
<p>To evaluate whether there are other products that we offer suitable to your needs.</p>	<p>This is necessary to achieve our legitimate commercial interest in ensuring products offered are appropriate.</p>
<p>For direct marketing purposes so that we may inform you of our products or services.</p>	<p>For marketing through email, SMS, voice call (landline) and direct mail, we rely on our legitimate commercial interest in marketing similar products and services to you. For marketing through voice calls to your mobile phone, we rely on your consent. You can update your marketing preferences online by going to the settings menu of My Avant Money or by contacting us on marketing.preferences@avantmoney.ie.</p>
<p>To undertake research, testing, IT review and repairs and to process improvements to our services and IT platform.</p>	<p>This is necessary to achieve our legitimate commercial interest in operating the business efficiently.</p>
<p>To process payments to and from your Avant Money underwritten mortgage, credit card or loan accounts.</p>	<p>This is necessary to fulfil our contractual obligations to you.</p>
<p>To offer and operate loyalty and reward programmes either offered by us and/or that you have signed up to.</p>	<p>This is necessary to fulfil our contractual obligations to you.</p>
<p>To monitor and record telephone conversations to help us improve customer service and for quality and training purposes.</p>	<p>This is necessary to achieve our legitimate commercial interest in operating our business efficiently.</p>
<p>To share your contact information and loan application status with a car dealership that you are purchasing a vehicle from where you apply for a loan through the DoneDeal portal on the Avant Money website.</p>	<p>We rely on your consent to share this information. You can withdraw your consent at any time by emailing DPO@avantmoney.ie.</p>

Where we rely on our legitimate interests as the legal basis for processing, we will not process your personal data for these purposes if to do so would constitute an unwarranted interference with your own interests, rights and freedoms.

Interest-Based Advertising

Avant Money uses third party ad-serving companies such as Google and Facebook to display interest-based advertising. Interest-based ads, also sometimes referred to as personalised ads or targeted ads, are displayed to you based on information gathered from your interaction with us or your interaction with the third-party websites and services.

We may use your personal data such as your email address, mobile phone number and other information collected in accordance with this Privacy Notice to provide an interest-based ad or offer to you on third-party websites or to ensure that you do not see advertising or offers from Avant Money that are not relevant to you. This is necessary to achieve our legitimate commercial interest in ensuring products offered are appropriate.

You can object to Avant Money's interest-based advertising at any time and free of charge by emailing dpo@avantmoney.ie.

You can also find out more about how your personal data may be used in connection with advertising on the third-party websites and options for opting out through the individual privacy policies of each third party. These privacy policies are available on their respective websites.

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6. International Transfers

Where Avant Money transfers personal information to third parties for processing we ensure that we have an appropriate contract in place that protects your personal information and complies with our obligations under Data Protection Law. For transaction data, we transfer your transaction information to anywhere in the world where you make a financial transaction through a payment system using one of our products.

Where any person working for us (including any member of the Bankinter Group) is processing personal data on our behalf and that processing is outside of Europe, Avant Money will ensure that the processing is on the basis of either an adequacy decision by the European Commission or appropriate or suitable safeguards as required by Data Protection Law and that appropriate contracts are in place to confirm this.

A number of firms working for us avail of Binding Corporate Rules. Binding Corporate Rules or "BCRs" were developed by the European Union Article 29 Working Party (now the European Data Protection Board) to allow multinational corporations, international organizations, and groups of companies to make intra-organizational transfers of personal data across borders in compliance with Data Protection Law. A copy of these Binding Corporate Rules is available on request.

Mastercard and Visa International Transfers

Some of the processing of personal data by Mastercard and Visa may be located outside of Europe and where this is the case, Mastercard and Visa will ensure that processing is in line with Data Protection Law.

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7. Who we share Personal Information with

- Any person working for us (including any member of the Bankinter Group) for the purposes we have listed above in the “How we use Personal Information” section.
- If you arrange insurance through us, to the insurer.
- Any regulatory or statutory bodies, for example (but not limited to) the Central Bank of Ireland, the Data Protection Commission and the Financial Services and Pensions Ombudsman.
- External consultancy firms e.g., legal, accountancy and audit and other professional services.
- Any organisation which backs any of our products which you hold.
- Any guarantor of any agreement between you and us.
- Any payment system under which we issue your card (i.e., Visa or Mastercard).
- Any person we transfer our rights or obligations to under any agreement we may have with you.
- Anyone you authorise us to give personal information to.
- Any merchant or third party that we need to make enquiries with in relation to your account or that you have a disputed transaction with.
- Any credit intermediary, third party or mortgage service provider and broker appointed by or payment services agent of Avant Money.
- Credit Reference Agencies e.g. Central Credit Register.
- Any partner providing benefits to you on your card purchase transactions.
- Any communications provider that acts on our behalf in relation to communications we may send to you.
- Any third party we sell the whole or part of our business to.
- Any third party, in accordance with the provisions of law, to meet our legal requirement or request, e.g., if we suspect criminal activity, we may share this with law enforcement agencies.
- Service providers to enable them to provide support to our business operations e.g. data quality and accuracy services; technology services; card, PIN, letters and statement producers and other printing services; anti money laundering sanctions list checking and compliance checks; account/card processing services and to store customer data, transaction and payment data.
- When you apply for a loan through the DoneDeal portal on the Avant Money website, we may share some personal data (your name, email address and mobile phone number) with the car dealership that you are purchasing a vehicle from.
- Any Account Information Service Provider (AISP) that you have instructed to access your account information.
- Image recognition software providers who assist Avant Money with data extraction from scanned documents or image files provided by you as part of your credit application.

- Data categorization services who will create a financial profile to assist Avant Money provide you with an accurate credit decision.

We will only share your personal data with the above parties where it is necessary to fulfill our contractual and legal obligations; in accordance with our legitimate interests or where required, we have consent to do so.

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8. Central Credit Register (CCR)

Under the Credit Reporting Act 2013, Avant Money is required to provide personal and credit information for credit applications and credit agreements of €500 and above to the CCR. This information will be held on the CCR and may be used by other lenders when making decisions on your credit applications and credit agreements. We, along with other lenders, must transfer personal and credit information on a monthly basis to the CCR for loans and credit cards.

As part of the Credit Reporting Act 2013, we are required to obtain and evidence an individual's PPSN when an application for credit is completed.

It is important to note that if you do not keep up your repayments on the mortgages, loans or credit cards underwritten by us, the missed payments will be reported to the CCR and will appear on your credit report. In addition, should you enter into a restructure arrangement with us arising out of financial difficulties; this restructure will be reported to the CCR.

You have the right to:

1. Request your credit report from the CCR at any time and the first credit report each year is free;
2. Insert a 200-word explanatory statement on your credit report;
3. Apply to have your information amended if you believe it is:
 - a. Inaccurate;
 - b. Incomplete; or
 - c. Out of date; and
4. Make a report to the CCR if you reasonably believe that someone has, is, or is about to impersonate you.

For more information about the Central Credit Register

- Website: www.centralcreditregister.ie
- Email: consumerinfo@centralcreditregister.ie
- LoCall: 1890 100 050
- LandLine: 01 224 5500

No earlier than the end of August 2021, the CCR will commence the transfer of your personal information to the Central Statistics Office (CSO) excluding PPSN, Eircode and contact number(s).

Please see the CSO's comprehensive FAQ which is available at [here](#) and the CCR's FAQ's regarding Data Protection [here](#).

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9. Mastercard

As part of the agreement between Avant Money and Mastercard, Mastercard will process your personal data in line with section 3.10 of the Mastercard rules which you can find at <https://www.mastercard.us/en-us/about-mastercard/what-we-do/rules.html>, including for internal research, fraud, security and risk management purposes. Some of this processing will be located outside of Europe and where this is the case, Mastercard will ensure that processing is in line with Data Protection Law.

The Mastercard Binding Corporate Rules have been approved by the EEA data protection authorities and you have the right to enforce these rules as a third party beneficiary. The Mastercard Binding Corporate Rules can be viewed at <https://www.mastercard.us/content/dam/mccom/en-us/documents/mastercard-bcrs-february-2017.pdf>.

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10. Automated Decision Making and Profiling

Lending Decisions

When you apply for one of our products, we may use an automated decision-making system to process the personal information that you provide and the personal information that we are allowed to collect from others. These automated decisions can affect the products and services we may offer you now or in the future, or the price that we charge you for them. This automated decision-making system can lead to quicker decisions which are more appropriate and consistent.

For credit applications, the system analyses your personal information, your credit score from the credit reference agencies, your financial history and whether you meet our minimum credit requirements. If the system finds that you do not meet our minimum credit requirements, we may not approve your application.

In assessing your application, the automated decision-making system will look at various pieces of information to assess your Stability, Ability and Willingness (as defined below) to pay. This assists in making fair and responsible lending decisions.

- “Stability” – How stable is your situation in relation to time in employment and residential status. This is assessed by looking at employment, residential status etc.
- “Ability” - Can you afford the payments based on the income and expenditure information provided or other outstanding debts you hold etc.
- “Willingness” – How reliable and responsible are you in relation to your other bills and paying other debt?

If requested, we shall manually assess your application. As part of this assessment, one of our credit underwriters will review the decision made by the automated decision-making system and the data created and considered as part of the automated decision-making.

In addition, when you apply for one of our products and while you are a customer of Avant Money, we will use automated tools to review the personal information you provide or that we are allowed to collect from others to evaluate and tailor other products or services that may be suitable to your needs. We will only contact you in relation to these offers if you have agreed to this contact. You

have the right to object to this profiling or appeal a decision at any time by contacting DPO@avantmoney.ie.

Financial Behaviour Decisions

We will use technology to help us analyse and assess the information we collect through your use of our products and services e.g, credit limit, balance, payments, spends and interest charged. This helps us evaluate and understand your financial behaviour and assists us to tailor the most appropriate action in relation to your account.

You have the right to object to this type of profiling at any time by contacting DPO@avantmoney.ie.

We regularly test our profiling and automated decision-making tool to ensure that the decisions made through it are fair, effective and unbiased.

If you believe that the results of any automated decision-making are incorrect, you can appeal the results by contacting:

- For Avant Money credit card and loan accounts - 0818 409 511
- For Chill Money credit card and loan accounts – 0818 812 800
- For An Post Money credit card and loan accounts – 0818 205 410

and we will review the results.

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11. Your Rights

Under the applicable Data Protection Law, you have the following rights:

- Access, Rectification or Erasure: You have the right of access to personal information we hold about you in our records. You are also entitled to have your personal data corrected if it is inaccurate or erased if we do not have a legitimate reason for retaining your data.
- To be Informed: you have the right to be informed how your personal information is being processed.
- To Restrict Processing: you have the right to restrict the processing of your personal information where you are contesting the accuracy of that information, you have objected to processing (as described below), or where the processing is unlawful.
- To Object: where your personal information is being processed based solely on our legitimate interests ([see section 5](#)), you have the right to object to that processing.
- To Data Portability: for personal information which you have provided to a controller, where processing was based on your consent or for the performance of our contract with you or where processing is done by automated means, you have the right to be able to move your data from one IT system to another in a safe and secure way.
- To Withdraw Consent: if Avant Money are processing personal data based on your consent, you may withdraw that consent at any time.

Below are the contact details to exercise any of the above rights:

- **By email** - DPO@avantmoney.ie
- **In writing** - Data Protection Officer, Avantcard DAC, Dublin Road, Carrick-on-Shannon, Co Leitrim

If you believe we are processing your personal information improperly, please let us know. You can also file a complaint with the Irish Data Protection Commission. For information on how to file a complaint, go to the Data Protection Commission's website at www.dataprotection.ie.

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12. Sale of the Avant Money Business

We may disclose your personal information to potential direct or indirect acquirers of Avant Money, or of any part of our business, as part of a due diligence process including for testing purposes in preparation for migration. Where we make such disclosures, we will do so subject to strict confidentiality agreements and security arrangements. Where there is a transfer of our business, or any part of it, to a third party, we may transfer your personal information to that third party in order to allow them to continue to provide services to you.

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13. Telephone Calls

We record inbound and outbound telephone calls for quality assurance and training purposes.

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14. Changes to our Privacy Notice

We may change this Privacy Notice from time to time and to ensure we continue to follow best practice when it comes to your privacy. When such a change is made, we will post a revised version on this website. Changes will be effective when they are posted. It is your responsibility to review this Privacy Notice from time to time to be aware of any such change. Your continued use of the service will indicate your agreement to any such change. This Privacy Notice was last updated in January 2022.

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15. Tell us what you think

Avant Money welcomes your question and comments about privacy, and you can do so by writing to the Data Protection Officer, Avantcard DAC, Dublin Road, Carrick-on-Shannon, Co Leitrim.

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You can access information in relation to our Cookies policy [here](#)