

## About us

We are Pepper Finance Corporation (Ireland) DAC trading as Pepper Money for both residential and commercial mortgage loans and Pepper Asset Servicing for loan management services (“Pepper”, “we”, “our”). We are a member of the Pepper group of companies. Our address is Fourth Floor, Two Park Place, Hatch Street Upper, Dublin 2. We are registered at the Companies Registration Office, Dublin with company registration number 34927. Our VAT number is IE9F42577Q.

## Regulatory status

Pepper Finance Corporation (Ireland) Designated Activity Company is regulated by the Central Bank of Ireland (“Central Bank”). Pepper is subject to the following Central Bank Codes of Conduct and Regulations which offer protection to consumers. These can be found on the Central Bank’s website [www.centralbank.ie](http://www.centralbank.ie)

Consumer Protection Code	Central Bank (Supervision and Enforcement) Act 2013 (Section 48) (Lending to Small and Medium-Sized Enterprises) Regulations
Code of Conduct on Mortgage Arrears	Minimum Competency Code and Regulations

## Main business

Pepper’s principal activity, when trading as Pepper Money, is the provision of residential and commercial mortgage loans. Our principal activity, when trading as Pepper Asset Servicing, is the management of Pepper loans or the provision of loan portfolio management/credit servicing to various investment companies which we have an interest in, along with third party servicing activities.

## Charges

We may charge for our products and services. These are set out in detail in our loan application forms and in our fees and charges leaflets relevant to such products and services.

## Conflicts of interest

We have a conflicts of interest policy in place to ensure conflicts of interest are avoided. Where it is not possible to avoid a conflict of interest, we will ensure you are treated fairly. Where relevant we will seek your acknowledgment in writing that you still wish to proceed to avail of a product or service.

## Consumer defaults

Where you are in default on an agreement with us, we may terminate that agreement and/or take such steps (including legal proceedings and enforcement of security) as we believe necessary. Any steps taken will be in accordance with the relevant terms and conditions of the agreement and any applicable Central Bank Regulation or Code of Conduct.

## Making a complaint

We seek to resolve any concerns or complaints fairly and promptly. We have a written procedure for the proper handling of complaints including that complaints will be recorded, investigated and resolved. Should you wish to make a complaint in relation to your business with Pepper, you may telephone us at 1890 521000 or write to us.

For Pepper Money please write to:

For Pepper Asset Servicing please write to:

Complaints Department	Complaints Department
Pepper Money	Pepper Asset Servicing
PO Box 693	PO Box 693
Shannon	Shannon
Co. Clare	Co. Clare

In the event that you are not satisfied with our response, you may be entitled to refer the matter to the Financial Services and Pensions Ombudsman at the address below:

Financial Services and Pensions Ombudsman  
Lincoln House, Lincoln Place,  
Dublin 2, D02 VH29.

Tel: (01) 567 7000  
Email: [info@fspoi.ie](mailto:info@fspoi.ie)  
Website: [www.fspoi.ie](http://www.fspoi.ie)

## Effective Date

These Terms of Business are effective as at 12th February 2018.

## Central Credit Register (established by the Central Bank)

**NOTICE: Under the Credit Reporting Act 2013 lenders are required to provide personal and credit information for credit applications and credit agreements of €500 and above to the Central Credit Register. This information will be held on the Central Credit Register and may be used by other lenders when making decisions on your credit applications and credit agreements.**

## Changes to these Terms of Business

Where there are any material changes to these Terms of Business we will notify affected customers as soon as possible in paper or electronic form and the notice may take the form of an advertisement in one or more newspapers circulated nationally in Ireland.

## Language and Governing Law

We conduct our business in the English language and all our communications with you will be in English. Our relationship with you is governed by the laws of Ireland.

## Data Protection Notice

Pepper is registered with the Office of the Data Protection Commissioner as a data controller in respect of the loans it owns and as a data processor in respect of its credit servicing activities (as defined by the Data Protection Acts 1988 and 2003, as amended or replaced from time to time, “the Acts”). In relation to the latter, Pepper may also be regarded as a data controller in circumstances where Pepper retains personal data for a period beyond the servicing relationship for the purposes of compliance with regulatory obligations applicable to Pepper. Pepper is required to act in accordance with the Acts at all times. Below is a summary of how your information is used. Where Pepper is a data controller of your information because it owns your loan, please refer to your loan agreement (and in particular the Data Protection Notice set out in your loan application) for additional information, or contact us (at the relevant address set out above) in relation to your query. Where Pepper is a data processor, we act in accordance with the requirements of the data controller, that is the owner of your loan.

## How we collect information about you

In its capacity as a data controller, or in accordance with the requirements of the data controller where it acts as a data processor, Pepper may collect and hold personal information, including information received from you or (where applicable) provided to Pepper by the owner of your loan, and information obtained from third parties such as credit reference agencies. We may also, where permitted: (a) in connection with providing you with the relevant loan, consult any other records or information that Pepper or any other member of the Pepper group holds as a lender or may lawfully obtain from a third party in relation to you (including, without limitation, in relation to any other loans or accounts you may hold with Pepper or a Pepper group company); or (b) in connection with servicing your loan, consult any other records or information that we hold on behalf of your lender, including where appropriate, in relation to any other loans or accounts you may hold with your lender, or may lawfully obtain from a third party in relation to you.

We will sometimes record telephone conversations to improve services, for training purposes, resolve complaints

and as required by relevant Regulations and Codes of Conduct. However, we will always let you know when we are recording our calls with you.

Our websites use 'cookie' technology. Cookies are small pieces of information that are placed on your computer or other device by a website that you visit. Cookies can store information about your preferences and other information that you need when you visit a website. Pepper uses cookies to monitor our website traffic, to provide a better service and to remember your preferences in browsing the website. We also use cookies for statistical analysis. Cookies do not themselves contain any information that identifies you but if you provide information to us, it may be linked to the information stored in the cookie.

## **How we keep your information safe**

To protect your information we use security measures that comply with the Acts and meet international standards. These include computer safeguards, ensuring files are stored securely and ensuring our offices have adequate security.

## **Use of your information**

We may use your information for purposes permitted by law such as to help administer your account, to conduct credit checks, and to help prevent and detect fraud or loss. In addition, where permitted to do so, we may use your information for purposes such as carrying out marketing analysis, customer profiling and conducting research. We do not disclose your information to anyone outside of Pepper except where: you have given your permission; or where we are required or permitted to do so by law or regulation; or to credit reference and fraud prevention agencies and other companies that provide a service to us or you. In connection with the purposes described above, where permitted to do so, we may disclose your personal data to our group companies, insurers, suppliers and advisers. We may also disclose your personal data to prospective assignees of your loan and/or any person to whom we may assign or otherwise transfer our rights and obligations under your loan agreement with us.

## **Your information and third parties**

We may use other companies and individuals to work on our behalf or to give us information to help us make decisions. This may include for data analysis, trace information, or issuing mail. We contract with all such third parties to keep your information confidential and to ensure compliance with the Acts.

We are required by law to provide your information to the Central Bank for the purposes of the Central Credit Register as described in the Central Credit Register "Notice" above. We may also share your information with other credit registers or with credit reference agencies at any time during your relationship with us to verify your identity and suitability for a loan or as part of our fraud prevention measures. Other organisations who are members of the credit reference agencies can access this data to consider any application for credit and credit related services, and to trace debtors, recover debts, prevent or detect money laundering and fraud, and to manage your account.

## **Transfers outside of the EEA**

In connection with the uses and disclosures of your information as described in this Data Protection Notice, your personal data may be transferred to, or accessed from, countries outside of the European Economic Area ("EEA"). Countries outside of the EEA may not have the same level of protection for your personal data as Ireland. If we transfer personal data outside of the EEA, we will do so in accordance with the requirements of the Acts.

## **Accessing and managing your information**

We try to ensure that the information we have about you is accurate and up to date. Sometimes we may ask you to verify that the information we have remains accurate. If you believe that we have information about you that is not accurate or up-to-date, please let us know and we will change it.

Under the Acts, you have the right to access any information we hold about you (an "access request"). To get a copy of this information, please write to us at Customer Services, Pepper Asset Servicing, PO Box 693, Shannon, Co. Clare. We will charge you €6.35 to provide you with this information.