Store Cards Market Investigation Order

Date of report: 7 March 2006

Date of Order: 27 July 2006

Background

On 18 March 2004 the Office of Fair Trading, in the exercise of its powers under section 131 of the Enterprise Act 2002, referred to the Competition Commission for investigation and report, the supply, in the United Kingdom, of (a) store card credit services to retailers and services related thereto (store card credit services); and (b) consumer credit through store cards; and

On 3 March 2005 the terms of reference were varied in accordance with section 135 of the Enterprise Act 2002 to refer to the supply of (a) store card credit services to retailers and services, including insurance services, related thereto (store card credit services); and (b) consumer credit services through store cards and insurance purchased in association with the provision and use of those store cards; and

The Competition Commission investigated the matters referred to it pursuant to section 131 of the Enterprise Act 2002 and concluded, in accordance with section 134(1) of the Enterprise Act 2002, that a combination of features of a relevant market prevents, restricts or distorts competition in connection with the supply or acquisition of any goods and services in the United Kingdom and, in accordance with the provisions of section 134(2) of the Enterprise Act 2002, that an adverse effect on competition exists; and

The Competition Commission found that there is a detrimental effect on customers resulting from the adverse effect on competition and considered, in accordance with section 134(4) of the Enterprise Act 2002, whether (a) action should be taken by it for the purpose of remedying, mitigating or preventing the adverse effect on competition concerned or the said detrimental effect on customers so far as it has resulted from, or may be expected to result from, the adverse effect on competition and whether (b) it should recommend the taking of action by others for the purpose of remedying, mitigating or preventing the adverse effect on competition concerned or any detrimental effect on customers so far as it has resulted from, or may be expected to result from, the adverse effect on competition; and

In accordance with the provisions of section 165 of, and paragraph 2(1)(a) of Schedule 10 to, the Enterprise Act 2002, the Competition Commission published on 31 May 2006 a notice stating its intention to make this Order, indicating the nature of the provisions to be embodied in it and stating that any interested person who wished to make representations in respect of it should do so in writing before 30 June 2006; and

The Competition Commission has considered all the representations it has received;

NOW, therefore, the Competition Commission makes this Order in accordance with the duty imposed by section 138 and exercise of the powers conferred by section 161(1), 161(3) 161(4) of, and paragraphs 1, 2, 4, 8, 10, 11, 15, 18 and 19 of Schedule 8 to, the Enterprise Act 2002, for the purpose of remedying, mitigating or preventing the adverse effect on competition and for the purpose of remedying, mitigating, or preventing any detrimental effect on customers so far as they have resulted from, or may be expected to result from, the adverse effect on competition specified in the report of the Competition Commission entitled 'Store cards market investigation':

1. Citation and commencement

- 1. This Order may be cited as the 'Store Cards Market Investigation Order'.
- 2. (a) The date of commencement of this Order shall be 1 May 2007 when the provisions of this Order come into force.
 - (b) The provisions of Article 4 of, and Schedule 1 to, this Order shall remain in force for a period of three years and continue in force thereafter unless, following a review of the operation of the said provisions by the Office of Fair Trading, they are superseded, varied or revoked by the Competition Commission.

2. Interpretation

In this Order:

'APR tier' means a level of current APR;

'APR warning' means a notice required to be placed on a relevant store card statement in accordance with Article 4 which contains the information as set out in Part 1 of Schedule 1 to this Order displayed in the manner provided by Part 2 of Schedule 1 to this Order:

'average current APR' means the number which results from a relevant calculation;

'current APR' means the Annual Percentage Rate of the total charge for credit on purchases calculated in accordance with Regulations currently in force including the Consumer Credit (Total Charge for Credit) Regulations 1980 and on the specific assumptions that must be made in respect of running account credit, including store cards, contained in Schedule 1 to the Consumer Credit (Advertisements) Regulations 2004 (the Advertisements Regulations) save that, for the purposes of this Order, references to 'relevant date' in the said Regulations shall be construed as a reference to the date of a store card statement or a date within five working days of the date of a store card statement:

'customer' means a person who has been issued with a store card or who applies for a store card:

'direct debit facility' means the facility for a customer to have payments made from one bank account to another without the involvement of the payer, in accordance with current inter banking arrangements;

'direct debit mandate' means the documentation which enables the establishment of a direct debit facility;

'direct debit notice' means a notice placed on an application form for a store card, in accordance with the provisions of Article 5(2) of this Order, which is in the form set out in Schedule 4 to this Order;

'direct debit provision' means the information or documentation that enables or facilitates the establishment of a direct debit facility;

'minimum payment warning' means the wealth warning statement in the form set out in Schedule 3 to this Order (or in such other form as may be prescribed by legislation from time to time) and which is required to be:

- (a) contained on a store card statement in accordance with the provisions of Article 3 of, and Schedule 2 to, this Order; and
- (b) supplied with a direct debit mandate in accordance with the provisions of Article 5(3) of this Order;

'multi tier store card programme' means a store card programme comprising more than one APR tier;

'oral minimum payment warning' means the information contained in the wealth warning statement set out in Schedule 3 to this Order and which is given orally to a customer by, or on behalf of, a store card provider in accordance with Article 5(4) of this Order;

'prescribed form' means the format and manner in which certain prescribed information must be provided, in accordance with Article 3 and as set out in Part 2 of Schedule 2 to this Order;

'prescribed information' means the information that is required to be provided on a store card statement, in accordance with Article 3 and as set out in Part 1 of Schedule 2 to this Order;

'payment protection' means an insurance which involves the insurance of payments relating to a store card account, in the event of any one or more of, an accident to, or the illness of, or the unemployment of, or the death of, a customer;

'price protection' means an insurance which involves the refund, to a customer, of any difference between the price paid by the said customer for an item and a lower price at which the said item is offered for sale within a specified period;

'purchase protection' means an insurance which involves the replacement of an item, purchased by a customer, in the event of any one or more of, damage or loss or theft of the item within a specified period;

'regular interval' means a period always of the same or equivalent length not exceeding three calendar months in duration, at the end of which or in the course of which a relevant calculation is made, the first period ending on a date selected by a store card provider which is within three calendar months of the date of the coming into force of this Order or, in the case of a store card provider who was not operating prior to the coming into force of this Order, a date selected by the store card provider which is within three calendar months of the commencement of the operation of the store card programme;

'relevant calculation' means the calculation of the average current APR charged within a multi tier store card programme by the weighting of each APR tier by the aggregate interest bearing balances (excluding balances that are within an interest free period) within that tier, in relation to the total interest bearing balances for the said store card programme, in respect of each successive regular interval, such calculation being made either:

- (a) at the end of a regular interval; or
- (b) from an average of more than one calculation made within a regular interval

provided that if a relevant calculation is made in accordance with paragraph (b), each subsequent relevant calculation must be made in accordance with that paragraph

and on a basis that is fully consistent, as to the number of calculations made and as to the intervals between the calculations, with the basis on which the first calculation is made in accordance with that paragraph;

'relevant percentage' means a current APR of 25 per cent or higher and a store card account is one to which a relevant percentage applies:

- (a) in the case of a single APR programme, if a current APR which is 25 per cent or higher applies to that programme; or
- (b) in the case of a multi tier store card programme:
 - (i) if an average current APR which is 25 per cent or higher applies to that programme; and
 - (ii) the store card account belongs to a tier of that programme to which a current APR which is 25 per cent or higher applies;

'relevant store card statement' means a store card statement issued in respect of a store card account to which a relevant percentage applies;

'single APR programme' means a store card programme comprising a single APR tier;

'specified information' means information to be provided in accordance with Article 7 of and Schedule 5 to this Order;

'store card' means a payment card issued with respect to the purchase of the goods, services or facilities of (i) only one retailer or (ii) retailers who are members of a single group of interconnected bodies corporate or (iii) retailers who belong to a store card network or (iv) retailers who trade under a common name and which (in each case) has both associated retail benefits and permits the holder of the payment card under his contract with the issuer of the card to discharge less than the whole of any outstanding balance on his payment card account on or before the expiry of a specified period (subject to any contractual requirements with respect to minimum or fixed amounts of payment);

'store card account' means a contractual credit facility between a customer and a store card provider for the use of a store card;

'store card network' means a network of retailers who accept the cards of a three party payment card system;

'store card programme' means the store cards issued by a store card provider for a retailer or group of retailers;

'store card provider' means a person who provides credit to a customer through the issue of a store card:

'store card statement' means a statement issued to a customer by a store card provider which records the transactions made with the store card during a specific period and the outstanding balance;

'summary box format' means the display of information in summary form within a delimited area of a store card statement, clearly identified by lines or by the use of contrasting colours;

'transaction and balance details' means details of the transactions which have taken place on the store card account, the previous balance on the account, the current balance and any charges applied to the account;

'transaction box' means the discrete area, on the front page of a store card statement, on which is recorded the transactions which have taken place on the store card account, and which is clearly identified by lines or by the use of contrasting colours.

3. Full information on store card statements

A store card provider shall ensure that any store card statement contains:

- (a) the prescribed information; and
- (b) where applicable, the prescribed information in the prescribed form.

4. APR warning

A store card provider shall ensure that any relevant store card statement contains the APR warning.

5. Direct debit facility

When offering to provide a store card to a customer a store card provider shall ensure:

- 1. there is an option to pay all the monies owing on the store card account by direct debit; and
- 2. (a) direct debit provision is made available to the customer with the application form; or
 - (b) direct debit provision is made available after an application for a store card is made, provided that the application form contains a direct debit notice for completion by the customer; and
 - (i) contains the information that direct debit provision will be sent to the customer subsequently; or
 - (ii) informs the customer that they can establish a direct debit facility by telephone; and
- 3. any direct debit mandate provided to the customer is supplied with the minimum payment warning; and
- 4. where an application to establish a direct debit facility is made by a customer by telephone, the oral minimum payment warning is given to the said customer.

6. Insurance

1. Where a store card provider offers a package of insurance containing payment protection, price protection and purchase protection, the store card provider shall also offer, at the same time, payment protection as a separate insurance and also, and separately from the said payment protection alone, a package of insurance

- containing price protection and purchase protection or each of price protection and purchase protection as separate insurances.
- 2. Where a store card provider offers a package of insurance containing payment protection and price protection or a package of insurance containing payment protection and purchase protection, the store card provider shall also offer, at the same time, payment protection alone as a separate insurance.

7. Provision of specified information

The obligations in Schedule 5 shall apply.

8. Directions by the Competition Commission as to compliance

- 1. The Competition Commission may give directions to a person specified in the directions, or to a holder for the time being of an office so specified in any company or association:
 - (a) to take such steps within his competence as may be specified or described in the directions for the purpose of carrying out, or securing compliance with, this Order; or
 - (b) to do, or refrain from doing, anything so specified or described which he might be required by this Order to do or refrain from doing.
- 2. In paragraph 1 above 'steps' includes steps to introduce and maintain arrangements to ensure any director, employee or agent of a store card provider carries out, or secures compliance with, this Order.
- 3. The Competition Commission may vary or revoke any directions given.

Christopher Clarke *Group Chairman*

THE COMPETITION COMMISSION

Date

Part 1

The APR warning is

'The rate of interest charged on your account may be higher than on other sources of credit available to you. It may be costly for you to leave balances owing on your account after the interest free period.'

Part 2

- 1. The APR warning must be displayed on the front page of each relevant store card statement above the transaction box.
- 2. The APR warning must be displayed in bold type.
- 3. The APR warning must be displayed in a type font size no smaller than the largest type font size used for transaction and balance details.

Part 1

The prescribed information

- 1. (a) the current APR on purchases;
 - (b) an estimate of the amount of interest payable the next month in the event that the customer makes only the minimum payment (and assuming no further transactions on the store card account), expressed as 'Estimated interest next month' and accompanied by a reference to the explanation at paragraph 2(b) below;
 - (c) the minimum payment warning;
 - (d) the amount of each insurance charge accompanied by a description of the charge and the basis of calculation. Where this is as a percentage of the outstanding balance on the store card account, it must be expressed in terms of 'pence per £100 balance', the said information to be immediately adjacent to each insurance charge appearing in the transaction box;
 - (e) a reference to the reverse of the store card statement for the information in paragraphs 2(d)(i) below and, where applicable, the information in paragraph 2(e) below.
- 2. (a) a list of any charges payable in the event of late payment or default, including, in each case, a description of the charge and an amount (or, if this cannot be ascertained, the basis on which it will be determined):
 - (b) an explanation of the basis of calculation of the figure in paragraph 1(b) above;
 - (c) the rate of interest payable on the store card account or, where more than one such rate applies, all the rates, in all cases quoted on a per annum basis with details of when each rate applies and, as the case may be, to which element of the account:
 - (d) information as to:
 - (i) the options for the payment of monies owing on the store card account; and
 - (ii) the means by which the customer can establish a direct debit facility or amend an existing direct debit facility;
 - (e) information as to the means by which any insurance cover relating to the store card account can be reviewed, amended or cancelled and a summary of any such insurance cover. The said summary must inform customers that they should refer to their policy of insurance for full details of the insurance and of any applicable exclusions.

Part 2

The prescribed form

- 1. The prescribed information, set out in paragraph 1(a) to (e) of Part 1 above, must be displayed on the front page (namely, the first page) of a store card statement.
- 2. The prescribed information, set out in paragraph 2 (a) to (e) of Part 1 above, may be displayed:
 - (a) on the reverse page of a store card statement; and
 - (b) in summary box format with or without other information.
- 3. The current APR as specified in paragraph 1(a) of Part 1 above and the information specified in paragraph 2(d) of Part 1 above must be shown in bold type.
- 4. The type font sizes of the prescribed information set out at paragraph 1(a) to (e) of Part 1 above must not be smaller than the largest type font size used for transaction and balance details.
- 5. If a store card provider elects to display a monthly interest rate or any other interest rate on the front page of a store card statement in addition to the display of the current APR, the said interest rate must not be displayed in a greater type font size than the type font size in which the current APR is displayed, nor may it be displayed in bold type.

The minimum payment warning is the following wealth warning statement:

'If you make only the minimum payment each month, it will take you longer and cost you more to clear your balance.'

The direct debit notice is:

'Do you want the option of paying amounts owing on your card by direct debit?'

Yes No (Please tick whichever box applies to you)'

The specified information

- 1. Any person to whom this Order applies is required to provide to the Office of Fair Trading any information and documents reasonably required for the purposes of enabling the Office of Fair Trading to monitor and review the operation of this Order or any provisions of this Order.
- 2. Any person to whom this Order applies may be required by the Office of Fair Trading to keep and produce those records specified in writing by the Office of Fair Trading that relate to the operation of any provisions of this Order including, but not limited to, information and documents relating to the operation of the APR warning provisions in this Order, to the provision of separate insurances and to the information supplied to any customers whether orally or in writing.
- 3. Any person to whom this Order applies and whom the Office of Fair Trading reasonably believes to have information which may be relevant to the monitoring or the review of the operation of any provisions of this Order may be required by the Office of Fair Trading to attend and provide such information in person.
- 4. The Office of Fair Trading may publish any information or documents that it has received in connection with the monitoring or the review of this Order or any provisions of this Order for the purpose of assisting the Office of Fair Trading in the discharge of its functions under this Order.

EXPLANATORY NOTE (This Note is not part of the Order)

The Order implements the Competition Commission's decisions on remedies contained in its Report entitled *Store Cards Market Investigation* dated 7 March 2006.

Definitions

The Order imposes obligations which are relevant to all store cards covered by the Report entitled *Store Cards Market Investigation*. A store card is defined as a payment card issued with respect to the purchase of the goods, services or facilities of:

- only one retailer;
- retailers who are members of a single group of interconnected bodies corporate;
- retailers who belong to a store card network; or
- retailers who trade under a common name.

In each case the card has associated retail benefits (for example, discounts, reward schemes or privileges but not interest-free credit or other credit promotions which merely change the terms of the credit offer) and permits the holder of the payment card under his or her contract with the issuer of the card to discharge less than the whole of any outstanding balance on his or her payment card account on or before the expiry of a specified period (subject to any contractual requirements with respect to minimum or fixed amounts of payment).

The Order creates a concept of 'current APR', which includes relevant fees and charges as well as the interest rate at or within five working days of the statement date. This is distinct from the APR on the agreement, which is fixed when the agreement is entered into.

The Order defines each of payment protection, price protection and purchase protection insurance. Each definition contains a list of examples of the events which the relevant insurance is designed to cover.

Full information on statements

Article 3 requires store card providers (as defined in the Order) to display prominently certain key items of information on store card statements. These are detailed in Schedule 2 and outlined below.

The font size employed for these details must not be less than the largest font size used for transaction and balance details:

- (a) the current APR applicable to purchases (shown in bold);
- (b) an estimate of interest payable next month in the event that the cardholder only makes a minimum payment;
- (c) a minimum payment warning ('wealth warning') outlining the consequences of only making minimum payments;

- (d) the basis of insurance charges shown alongside each insurance charge appearing in the transaction box; and
- (e) a reference to the reverse side of the statement for details of how to pay and contact details to amend or check any insurance cover.

Other details that must be shown on the statement (but may be displayed on the reverse side either in a summary box format or elsewhere):

- (a) late payment or default charges and the basis on which these charges are determined:
- (b) the basic assumptions used in calculating the estimate of interest payable next month;
- (c) other interest rates, if applicable, for example rates chargeable on cash withdrawals;
- (d) a 'how to pay' section and contact details for setting up or amending a direct debit, prominently displayed within the 'how to pay' section; and
- (e) contact details for amending or cancelling insurance cover sold with the store card and a brief summary of insurance cover. The said summary must inform customers that they should refer to their policy of insurance for full details of their insurance protection and of any applicable exclusions.

The 'current APR on purchases', required to be shown in bold on the front page of the store card statement, relates to the definition of current APR in the Order as applied to purchases at or within five working days of the store card statement.

The Order does not prevent store card providers from showing a monthly interest rate on the front of a store card statement in addition to a current APR, but this information must not be shown in a greater font size than the current APR and must not be in bold type.

Schedule 3 sets out the required wording of the minimum payment warning. The minimum payment warning must be displayed on the front page of the store card statement in a font size no smaller than the largest font size used for transaction and balance details. The minimum payment warning must also be provided with a direct debit mandate or orally when direct debits are established by telephone.

APR warnings on store card statements

Article 4 requires store card providers where the current APR is 25 per cent or more to display prominently an APR warning on the front page of each monthly statement above the transaction box in bold lettering and in a font size no smaller than the largest font size used for transaction and balance details for store card programmes. The wording of the APR warning is set out in Schedule 1. An APR warning is not required where the current APR is less than 25 per cent.

For store card programmes using multi-tier APRs, the APR warning is required on all statements for tiers where the current APR is 25 per cent or more if the average current APR for the store card programme as a whole is also 25 per cent or more. An APR warning is not required on a store card programme with multiple APR tiers if the average APR for the store card programme as a whole is less than 25 per cent. The average APR for a store card

¹The definition of minimum payment warning identifies that if alternative wording is prescribed by legislation (for example, regulations under the Consumer Credit Act 2006), the obligation is to use whatever form of wording is currently in force.

programme with multi-tier APRs will be calculated by weighting each APR tier by the aggregate interest-bearing balances within that tier in relation to the total interest-bearing balances for the store card programme. This average must be calculated at regular intervals of no more than three months and undertaken on a consistent basis on each occasion, using the appropriate data on interest-bearing balances.

For store card programmes using a single APR tier for purchases the obligation to display an APR warning applies where the current APR is 25 per cent or more.

Provision and prominent display of facility to pay outstanding balances by direct debit

Article 5 requires that store card providers provide an option for all store cardholders to pay the account balance on their cards by direct debit. As it is included in the prescribed information required by Article 3, the availability of this option should be displayed in monthly statements.

Customers should also be provided with the information or documentation required to set up a direct debit at the time when they receive the initial contractual information. This requirement may be satisfied by providing a direct debit mandate either with the initial store card application form or in a welcome pack sent to each new store card customer. However, in the latter case, in accordance with Article 5(2)(b), the card application form must prominently display the question as set out in Schedule 4 'Do you want the option of paying amounts owing on your card by direct debit?' and a tick box indicating 'yes' or 'no' to ensure that this possibility has been brought to the customer's attention. In this case the application form must also inform the customer that a direct debit mandate will be available in their welcome pack or can be set up by telephone. The minimum payment warning should be provided with direct debit mandates and communicated to customers when they set up a direct debit by telephone.

Separation of payment protection insurance from the PPI package

Article 6 requires store card providers who offer insurance packages containing payment, price and purchase protection, to offer in addition, as separate items, (a) payment protection cover alone and (b) a package of price and purchase protection or each of price and purchase protection as separate insurances. Where store card providers offer a package of payment and price protection or payment and purchase protection, they must offer payment protection alone as a separate item. There will be no requirement, in those circumstances, to offer either price or purchase protection as separate elements.

Duty to comply and enforcement of the Order

Section 167 of the Enterprise Act 2002 places a duty on any person to whom this Order applies to comply with it. Subject to the defences in the section, any person who suffers loss or damage due to a breach of this duty may bring an action.

Section 167 of the Enterprise Act 2002 provides that the Office of Fair Trading and the Competition Commission can seek to enforce this Order by civil proceedings for an injunction or for interdict in Scotland or for any other appropriate relief or remedy.

Article 7 and Schedule 5 require the Office of Fair Trading to be provided with certain information in order to monitor and review the operation of this Order.

Nothing in the Order permits the publication or disclosure of information that would not be permitted under Part 9 of the Enterprise Act 2002.

Timing and commencement

Article 1 provides the date of commencement for the Order. It will come into force on 1 May 2007. This allows providers nine months after it is made to prepare.

The provisions of the Order and in particular the requirement to display the APR warning will remain in force for a minimum of three years from the date of commencement of the Order. The Competition Commission recommends that at the end of this period, the continuance of the Order and this requirement in particular should be reviewed by the OFT.

The OFT has a general duty to monitor the operation of the Order under section 162 of the Enterprise Act 2002. Article 1 of the Order does not affect the OFT's duty to consider, from time to time, whether it is appropriate to advise that the Order should be varied or revoked by reason of a change of circumstances; nor does it affect the Competition Commission's ability to vary or revoke the Order on the basis of the Office of Fair Trading's advice under section 161.

In the event of a conflict between this Order and subsequent legislation the provisions of the subsequent legislation will apply.

Status of this Explanatory Note

Nothing in this Explanatory Note, including the example statement, is legally binding. In the event of a conflict between this Explanatory Note and the provisions of the Order, the Order shall prevail.

Example store card statement

An illustration of a store card statement is set out below. This statement gives an example of how the information that this Order requires might be set out, alongside other information typically included on store card statements.

FRONT OF STATEMENT

Retailer's LOGO

Mrs XYZ XXXXXX XXXXX XXX

Account Number	2354689
Statement Date	19 May 2005
Credit Limit	£1,000
Available to Spend	£800.00
Current APR on purchases	29.9%

The rate of interest charged on your account may be higher than on other sources of credit available to you. It may be costly for you to leave balances owing on your account after the interest free period.

Rewards	Date	Reference	List of charges and credits	Amount
(if applicable)			TOTAL BROUGHT FORWARD	
			Xxxxx	
			уууууууу	
			XXXX	
			PAYMENT THANK YOU	
			Payment Protection-xxp per £100	
			balance	
			Price and Purchase Cover -xxp per	
			xxxx	
İ				

MARKETING MESSAGES	

New Balance	£200.00
Minimum Payment	£4.00
Payment Due Date	13 th June 2005
Estimated Interest	£4.93
Next Month (see reverse)	

lf y	ou/	make	only	the	minimum	payment	each	month,	it will	take	you	longer	and	cost	you
mo	re t	o clea	r vou	r bal	ance.										

PAYMENT SLIP

REVERSE OF STATEMENT

Estimated Interest is the amount of interest payable next month based on paying only the minimum payment by the due date.....

By Direct Debit If you would like to set up or amend a direct debit over the telephone to pay the minimum amount, or your full outstanding balance each month, call us on 0870 123 4567 At a bank

•	By post	
Х	x xxxxxx xxxx	х

Xxx xxxxx xxxxx

• Phone/Internet Banking Xxx xxxxx xxxx xxxx

• Debit Card Payment XXXX XXX XXXX

	Cummon, Box					
Polow is a summary of th	Summary Box e key features of the xxxxx Card not displayed					
	nt and is not intended to replace any terms and					
conditions.	in and is not intended to replace any terms and					
Purchase interest rate						
Other interest rates						
Other interest rates	xx.x% p.a. is chargeable on Cash Transactions					
Interest free period	Maximum xx days for purchases if you pay					
interest free period	your balance in full and on time. There is no					
	interest free period on Cash Transactions					
Interest Charging	The periods over which interest is charged are					
information	as follows:					
ormation	Xxxxxxx xxxxxx xxxx					
Allocation of payments	We will apply payments received to your					
r moodaach or paymonto	Account in the following order: xxxxxx xxxxxx					
	XXXXXX X XXXXX XXXXX					
Minimum repayment	Greater of x% of outstanding balance or £Z					
	each month					
Fees	[£ xx.xx]/[Not Applicable]					
Charges	Cash Transactions—x% with a minimum of £x					
Default charges	Late payment fee—£xx—we may impose a					
3	late payment fee if you miss payment by the					
	due date					
	Over credit limit fee—£xx					
	Administration fee—£xx—for returned					
	cheques or direct debits					
Insurance Cover	Payment protection: your payments will be					
	made for you if you are unable to work due to					
	an accident or					
	Price cover: if items you have bought are					
	reduced in price within x days of your					
	purchase, you can claim the difference					
	Purchase cover: Most items purchased on					
	your store card are protected for up to X days					
	against loss, theft or accidental damage					
	Please see your policy for full details of your					
	cover and exclusions					

ACCOUNT INFORMATION

Change of Address

Xxxxxxx xxxxxx xxxx

Lost or stolen cards

Xxxxx xxxxxxx xxxxxx

.....

Security

Xxxxx xxxxxx xxxxxxx

Merchandise Queries

Online account access

Xxxxxxx xxxxxxx

ACCOUNT ENQUIRY Customer Helpline 0870 123 4567

Insurance Changes And Cancellation

If you are not satisfied with your insurance cover, there is a X-day cooling-off period in which you can cancel your policy at no cost to yourself. After this you can cancel the policy at any time without incurring any cancellation charges. We will not return any of your monthly premiums. To cancel your policy or change your cover call us on