

TClarke

PRIVACY POLICY

This is the privacy statement of TClarke plc and its subsidiary companies ("TClarke").

TClarke is committed to protecting and maintaining your privacy. We comply with data protection laws that are applicable in respect of data processing within the UK. TClarke determines the purposes and the manner in which personal data is processed.

This privacy statement sets out how we collect, use and protect your personal information and your rights in relation to your information.

Types of personal information we collect

We may collect, use and store different types of personal information about you, examples of which we have grouped together as follows:

Types of personal information	Description
<i>Financial</i>	<i>Your financial position, status and history.</i>
<i>Social-demographic</i>	<i>Details about your work or profession, nationality, education and where you fit in to various social or income groupings.</i>
<i>Contractual</i>	<i>Details about the services we provide to you.</i>
<i>Special types of personal data</i>	<i>Some types of personal data are defined as special. We will only collect and use these types of data if the law allows us to:</i> <ul style="list-style-type: none"><i>• Trade union membership</i><i>• Genetic or bio-metric data</i><i>• Health data including gender</i><i>• Criminal convictions data</i>

How we use your personal information

In general terms, we collect and use personal information to:

- deliver our services and meet our legal responsibilities*
- verify your identity where this is required*

- *contact you by post, email or telephone*
- *understand your needs and how they may be met*
- *maintain our records*
- *process financial transactions*
- *prevent and detect crime, fraud or corruption*

More specifically, the table below explains how we use your personal information and the reasons that we rely on in doing so. Where these reasons include legitimate interests, we explain what these legitimate interests are.

What we use your information for	Our reasons	Our legitimate interests
<ul style="list-style-type: none"> • <i>To deliver our services</i> • <i>To make and manage customer payments</i> • <i>To manage fees, charges and interest due on customer accounts</i> • <i>To collect and recover money that is owed to us</i> 	<ul style="list-style-type: none"> • <i>Contractual performance</i> • <i>Legitimate interests</i> • <i>Legal obligations</i> 	<ul style="list-style-type: none"> • <i>Being efficient about how we fulfil our legal and contractual duties</i> • <i>Complying with regulations that apply to us</i>
<ul style="list-style-type: none"> • <i>To run our business in an efficient and proper way. This includes managing our financial position, business capability, planning, communications, corporate governance and audit</i> 	<ul style="list-style-type: none"> • <i>Legitimate interests</i> • <i>Legal obligations</i> 	<ul style="list-style-type: none"> • <i>Being efficient about how we fulfil our legal duties</i> • <i>Complying with regulations that apply to us</i>
<ul style="list-style-type: none"> • <i>To exercise our rights set out in contracts and agreements</i> 	<ul style="list-style-type: none"> • <i>Contractual performance</i> 	

Where we collect your personal information from

We may collect personal information about you (or your business) from the following sources:

Data you give to us: *e.g. When you talk to us over the phone / email us*

Data we collect when you use our services: *e.g. Payment and transaction data*

Data from third parties that we work with: *e.g. Publicly available resources, companies that introduce you to us etc.*

Who we share your information with

We may share your personal information with third parties:

- that are engaged by us to provide services to us, in which case we will require those parties to keep that information confidential and secure and to use it solely for the purpose of providing the specified services to us;
- if we or substantially all of our assets are acquired by a third party, in which case personal data held by our site will be one of the transferred assets;
- if we are under a duty to disclose or share your personal data to regulatory or law enforcement agencies.

If you choose not to give your personal information

If you choose not to give your personal information, it may delay or prohibit us from meeting our obligations/lead to us cancelling the service you have with us.

Information storage and retention

We have in place security measures to protect the security of your personal information and keep it confidential. We review these measures regularly to make sure they remain appropriate. We cannot guarantee the security of any third-party application you may use to transmit your data (for example, internet browsers).

We may transfer and process your data outside of the UK. Where your personal information is to be transferred outside the UK we will take reasonable steps to ensure that there are appropriate safeguards to protect your information.

We will keep your personal information for at least as long as we have a relationship with you. When deciding how long to keep your personal information after our relationship with you has ended, we take into account our legal, regulatory and professional obligations.

Using our website

TClarke uses Cookies on its website. Cookies are ways of saving a small amount of information. They are automatically downloaded to your device when you visit a website. Our site uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them see our Cookie policy

Your rights

You have rights regarding your personal information, including the right to access, correct, delete, restrict or object to our use of it.

Access to your information – You have the right to request a copy of the personal information about you that we hold.

Correcting your information – We want to make sure that your personal information is accurate, complete and up to date and you may ask us to correct any personal information about you that you believe does not meet these standards.

Deletion of your information – You have the right to ask us to delete personal information about you where:

- You consider that we no longer require the information for the purposes for which it was obtained
- We are using that information with your consent and you have withdrawn your consent – see *Withdrawing consent to using your information* below
- You have validly objected to our use of your personal information – see *Objecting to how we may use your information* below
- Our use of your personal information is contrary to law or our other legal obligations.

Objecting to how we may use your information – You have the right at any time to require us to stop using your personal information for direct marketing purposes. In addition, where we use your personal information to perform tasks carried out in the public interest or pursuant to the legitimate interests of us or a third party then, if you ask us to, we will stop using that personal information unless there are overriding legitimate grounds to continue.

Restricting how we may use your information – in some cases, you may ask us to restrict how we use your personal information. This right might apply, for example, where we are checking the accuracy of personal information about you that we hold or assessing the validity of any objection you have made to our use of your information. The right might also apply where this is no longer a basis for using your personal information, but you don't want us to delete the data. Where this right to validly exercised, we may only use the relevant personal information with your consent, for legal claims or where there are other public interest grounds to do so.

Portability – if we process personal information that you provide to us on the basis of consent or because it is necessary for the performance of a contract to which you are party, and in either case that processing is carried out by automated means, then you have the right to have that personal information transmitted to you in a machine-readable format. Where technically feasible, you also have the right to have that personal information transmitted directly to another controller.

Withdrawing consent using your information – Where we use your personal information with your consent you may withdraw that consent at any time and we will stop using your personal information for the purpose(s) for which consent was given.

Please contact us in any of the ways set out in the *Contact information and further advice* section if you wish to exercise any of these rights.

Changes to our privacy statement

We keep this privacy statement under regular review and will place any updates on this website. Paper copies of the privacy statement may also be obtained from the Data Protection Officer at dpo@tclarke.co.uk.

This privacy statement was last updated in May 2018.

Contact information and further advice

TClarke's Data Protection Officer can be contacted by email at dpo@tclarke.co.uk or by post at TClarke plc, 30 St Mary Axe, London EC3A 8BF.

Complaints

We seek to resolve directly all complaints about how we handle personal information, but you also have the right to lodge a complaint with the Information Commissioner's Office:

Online: <https://ico.org.uk/global/contact-us/email/>

By phone: 0303 123 1113

By post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF