

**Privacy Policy**

1. **Introduction**

This **Privacy Policy** explains in detail the types of personal data we may collect about you when you interact with us. It also explains how we will store and handle that data and keep it safe.

This policy contains information to keep youfully informed about your rights, and how Nationwide PPI Advice uses your data. Should you require any further information after reading through the following sections, please do get in touch with us.

It is likely that we will need to update this **Privacy Policy** from time to time. We will notify you of any significant changes we make via email, though you are welcome to come back and check it whenever you wish.

When you are using the Nationwide PPI Advice website, Nationwide PPI Advice is the data controller.

1. **Who are** **Nationwide PPI Advice?**

Nationwide PPI Advice is a claims management company specialising in reclaiming redress for its customers in relation to tax reclaim products. Nationwide PPI Advice, Company Registration number: 13158298 is a recognised data controller registered with the Information Commissioners Office (ICO) under registration number: ZB087916.

1. **Explaining the legal bases that we rely on**

The law on data protection sets out several different reasons for which a company may collect and process your personal data, including:

* **Consent**

In specific situations, we can collect and process your data with your consent.

For example, when you tick a box to receive information from us by email, text and/or post

When collecting your personal data, we will always make clear to you, which data is necessary in connection with a particular service.

* **Contractual obligations**

In certain circumstances, we need your personal data to comply with our contractual obligations.

For example, if you request us to manage a claim on your behalf, we will collect your contact details and lender details to enable us to do this.

* **Legal compliance**

If the law requires us to, we may need to collect and process your data.

For example, we can pass on details of people involved in fraud or other criminal activity affecting Nationwide PPI Advice to law enforcement agencies.

* **Legitimate interest**

In specific situations, we require your data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact your rights, freedoms or interests.

For example, we will use your contact details to advise you of new products and services we offer that we think may be of interest and benefit to you.

1. **When do we collect your personal data?**
* When you visit our website and sign up to receive information about our services;
* When you create an account with us;
* When you engage with us on social media;
* When you contact us by any means with queries, complaints etc;
* When you choose to complete any surveys we send you;
* When you comment on or review our products and services;
* When you fill in any forms during the claims process. For example, a questionnaire that will be sent to a lender etc;
* When you have given a third party, e.g. a lender, permissionto share with us the information they hold about you.
1. **What sort of personal data do we collect?**
* If you have a web account with us: your name, address, email and telephone number.
* Details of your interactions with us online, by post, email or telephone;

For example, we collect notes from our email or telephone conversations with you, details of any complaints or comments you make, details of the claims process and how and when you contact us.

* Copies of documents you provide as evidence in support of your claim and/or proof of identity, where the claims process and/or lender requires this. This may include details of your full name (including maiden name or previous name), address history, date of birth and/or facial image. If you provide a passport, the data will also include your place of birth, gender and nationality;
* Details of your visits to our website or apps, and which site you came from to ours;
* Information gathered by the use of cookies in your web browser. Learn more about this from our **Cookies Policy**;
* Account information, including lender(s), product type(s), specification(s), date(s), duration, history etc;
* Circumstances of the sale and advice given including information on savings, insurances, medical conditions, and employment status when the product was sold;
* Your comments and product/service reviews;
* To deliver the best possible web experience, we may collect technical information about your internet connection and browser as well as the country and telephone code where your computer is located, the web pages viewed during your visit, the advertisements you clicked on (if any), and any search terms you entered. Learn more about this from our **Cookies Policy**;
* Your social media username, if you interact with us through those channels, to help us respond to your comments, questions or feedback.
1. **How and why do we use your personal data?**

We want to give you the best possible customer experience. One way to achieve that is to get the richest picture we can of who you are by combining the data we have about you. We then use this to offer you products and services that are most likely to interest you.

The data privacy law allows this as part of our legitimate interest in understanding our customers and providing the highest levels of service. Of course, if you wish to change how we use your data, you will find details of how to do this in the **‘What are your rights over my personal data?’** section below.

Remember, if you choose not to share your personal data with us, or refuse certain contact permissions, we might not be able to provide the services you have asked for.

For example, if you have asked us to keep you informed of developments in respect of your claim(s), we cannot do this if you have withdrawn your general consent to hear from us.

Here is how we will use your personal data and why:

* To process any claim(s) regarding a tax reclaim product that you request us to make on your behalf by using our websites, apps or service. If we do not collect your personal data during this process, we will not be able to manage your claim and comply with our legal or regulatory obligations;

For example, your details will need to be passed to a third party (e.g. HMRC) in order to submit the claim(s) on your behalf and we may keep your details for a reasonable period afterwards in order to fulfil any contractual obligations, such as pursuing the claim to conclusion and/or settlement.

* To respond to your queries, requests and/or complaints. Handling the information you have sent us enables us to respond effectively. We may also keep a record of this to inform any futurecommunication with us and to demonstrate how we communicated with you throughout the process. We do this based on our contractual obligations to you, our legal obligations and our legitimate interests in providing you with the best service and understanding how we can improve our service based on your experience;
* To protect our business and your account from fraud and other illegal activities. This includes using your personal data to maintain, update and safeguard your account. We will also monitor your browsing activity with us to quickly identify and resolve any problems and protect the integrity of our websites. We will do all of this as part of our legitimate interest.

For example, we may do this by using automated monitoring of IP addresses to identify possible fraudulent logins from unexpected locations.

* To process payments and to prevent fraudulent transactions. We do this based on our legitimate business interests. This also helps to protect our customers from fraud;
* With your consent, we will use your personal data, preferences and details of your transactions to keep you informed by email, web, text, and/or telephone about relevant products and services we offer.Of course, you are free to opt out of hearing from us by any of these channels at any time;
* To send you relevant, personalised communications by post in relation to updates, services and products. We will do this based on our legitimate business interest.You are free to opt out of hearing from us in relation to new products and services by email, text message and/or post at any time;
* To send you communications required by law or which are necessary to inform you about our changes to the services we provide you. For example, updates to this **Privacy Policy**, regulatory notices, and legally required information relating to your claim(s). These service messages will not include any promotional content and do not require prior consent when sent by email or text message. If we do not use your personal data for these purposes, we would be unable to comply with our legal or contractual obligations;
* To display the most interesting content to you on our websites or apps, we will use data we hold about you. We do so,based on your consent to receive app notifications and/or for our website to place cookies or similar technology on your device. Learn more about this from our**Cookies Policy**;

For example, we might offer you recommendations based on any other data you have shared with us.

* To develop, test and improve the systems, services and products we provide to you. We will do this based on our legitimate business interests;

For example, we will record your browser’s Session ID to help us understand more when you leave us online feedback about any problems you are having.

* To comply with our contractual or legal obligations to share data with law enforcement;

For example, when a court order is submitted to share data with law enforcement agencies or a court of law.

* To send you survey and feedback requests to help improve our services. These messages will not include any promotional content and do not require prior consent when sent by email or text message. We have a legitimate interest to do so as this helps make our products or services more relevant to you;
* To build a rich picture of who you are and what you like, and to inform our business decisions, we may combine data captured from Nationwide PPI Advice, third parties and data from publicly-available lists as we have described in the section 'What Sort of Personal Data do we collect?' We will do this based on our legitimate business interest.

For example, by combining this data, this will help us personalise your experience and decide which information to share with you.

* Sometimes, we will need to share your details with a third party who is providing a service (e.g. HMTC). Without sharing your personal data in this way, we would be unable to fulfil your request.

We will record your interactions with us e.g. looking at how often you might contact us or what types of contact are made and for what purpose. We do this to create a profile on how you interact with Nationwide PPI Advice and, in turn, that can affect how we engage you. For example, if you contact us regularly by post, this may be the primary means of communicating back to you.We rely on our legitimate interests to undertake this activity.

1. **Combining your data for personalised direct marketing**

We want to bring you offers regarding newproducts and services across our businesses that are most relevant to your interests at particular times. To help us form a better, overall understanding of you as a customer, we combine your personal data gathered across Nationwide PPI Advice and our other businesses as described above, for example your claims history at Nationwide PPI Advice. For this purpose, we also combine the data that we collect directly from you with data that we obtain from third parties to whom you have given your consent to pass that data onto us, e.g. HMRC, as mentioned above.

1. **How we protect your personal data**

We know how much data security matters to all our customers and we take this seriously. With this in mind, we will treat your data with the utmost care and take all appropriate steps to protect it.We secure access to all areas of our websites and apps using ‘https’ technology.

Access to your personal data is password-and security protected, and sensitive data such as account information is secured to ensure it is protected.

We regularly monitor our system for possible vulnerabilities and attacks, and we carry out penetration testing to identify ways to further strengthen security.

1. **How long will we keep your personal data?**

Whenever we collect or process your personal data, we will only keep it for as long as is necessary in all the circumstances. When such data is no longer necessary, it will either be securely deleted/disposed of or anonymised and archived, for example by aggregation with other data so that it can be used in a non-identifiable way for statistical analysisand business planning only.

Free Checks and Claims

When you request our services in respect of a free check and/or claim(s), we will keep the personal data you give us for as long as is necessary in all the circumstances so that we can comply with our legal, regulatory and contractual obligations

Direct Marketing

When you have used our services, we will keep your personal data for as long as is necessary in all the circumstances, so we can advise you of new products and services we offer that may be of interest and of benefit to you. Marketing communications will be sent via email to you and will include an explicit opt in to receive future communications on these products and services, based on either your marketing consent or your acceptance of cookies on our websites.

1. **Who do we share your personal data with?**

We sometimes share your personal data with trusted third parties in order to fulfil our obligations to you.

For example, lenders, regulatory bodies, for fraud management, to handle complaints, to help us personalise our service to you and so on.

The policy we apply to those organisations to keep your data safe and protect your privacy is as follows:

* We provide only the information they need to perform their specific services;
* They may only use your data for the exact purposes we specify in our agreement or contract with them;
* We work closely with them to ensure that your privacy is respected and protected at all times;
* If we stop using their services, any of your data held by them will either be securely deleted or rendered anonymous.

Examples of the kind of third parties we may work with are:

* Financial institutions/HMRC;
* IT companies who support our website and other business systems;
* Direct marketing companies who help us manage our electronic communications with you;
* Google/Facebook to show you products and services that might interest you while you are browsing the internet. This is based on either your marketing consent or your acceptance of cookies on our websites. Learn more about this from our **Cookies Policy**;
* Data insight companies to ensure your details are up to date and accurate.
* For fraud management, we may share information about fraudulent or potentially fraudulent activity in our premises or systems. This may include sharing data about individuals with law enforcement bodies;
* We may also be required to disclose your personal data to the police or other law enforcement, regulatory or Government body, in the UK or elsewhere, upon a valid request to do so. These requests are assessed on a case-by-case basis and take the privacy of our customers into consideration;
* We may, from time to time, expand, reduce or sell Nationwide PPI Advice and this may involve the transfer of divisions of or the whole business to new owners. If this happens, your personal data will, where relevant, be transferred to the new owner or controlling party, under the terms of this **Privacy Policy**;
* For further information, please contact our Data Protection Officer via the contact details below.
1. **Where your personal data may be processed**

Your personal data will be processed in the UK. There may be times when we will need to share your personal data with third parties and suppliers outside the European Economic Area (EEA).

* Protecting your data outside the EEA

The EEA includes all EU Member countries as well as Iceland, Liechtenstein and Norway. We may transfer personal data that we collect from you to third-party data processors in countries that are outside the EEA.

For example, this might be required in order to fulfil our services to you, to process your payment details or provide support services.

If we do this, we have procedures in place to ensure your data receives the same protection as if it were being processed inside the EEA. For example, our contracts with third parties stipulate the standards they must follow at all times. If you wish for more information about these contracts, please contact our Data Protection Officer.

Any transfer of your personal data will follow applicable laws and we will treat the information under the guiding principles of this **Privacy Policy**.

1. **What are your rights over your personal data?**

The fundamental rights you have over your personal data are as follows: -

* Right of Access − The right to request a copy of the personal data we hold about you;

A standard overview will include: your personal and contact details, consents to receive marketing from us, service history, cases/complaints, financial product and policy data etc.Some of these items may be absent if we hold no relevant data (e.g. if you have no claims).

* Right to Rectification − The right to request the update of your personal data when incorrect, out of date or incomplete;
* Right to Erasure ('to be Forgotten') − The right to request deletion of some or all personal data we hold about you, in specific circumstances;

**IMPORTANT NOTE:** If you request deletion of all your data this means that marketing contact with us will end. Alternatively, you can choose to opt-out from marketing by logging into your online claims portal/account or advising us of this in an alternative way, e.g. by email, telephone or post. Also please note that if you have ongoing claims with us, we will not delete this data until those arrangements come to an end and there is no requirement for such data to be retained. In certain cases, we may continue to process your personal data even if you ask us to erase it, for example for fraud prevention or other legal reasons.

* Right to Object − The right to stop receiving direct marketing communications from us. And the right to object to other processing of your personal data (other than direct marketing) in specific circumstances;
* Right to Restriction − The right to request us to restrict processing of the data we hold about you, in some specific circumstances;
* Right to Data Portability − The right to request a copy of personal data that you have provided us in a usable format;
* Right related to automated decision-making, including profiling − The right to request for a review of automated individual decision-making and profiling that is performed on you. Automated decision-making means making a decision solely by automated means without any human involvement. If you want to review an automated decision that has been taken, please contact us via info@nationwideppiadvice.co.uk

You specifically have the right to request:

* Access to the personal data we hold about you, free of charge in most cases;
* The correction of your personal data when incorrect, out of date or incomplete;
* The deletion of the data we hold about you, in specific circumstances; for example, when you withdraw consent or object, and we have no legitimate overriding interest, or once the purpose for which we hold the data has come to an end;
* A computer file in a common format (CSV or similar) containing the personal data that you have previously provided to us, and the right to have your information transferred to another entity where this is technically possible;
* Restriction of the use of your personal data, in specific circumstances, generally while we are deciding on an objection you have made;
* That we stop processing your personal data, in specific circumstances; for example, when you have withdrawn consent, or object for reasons related to your individual circumstances;
* That we stop using your personal data for direct marketing (either through specific channels, or all channels);
* That we stop any consent-based processing of your personal data after you withdraw that consent;
* Review of any decision made based solely on automatic processing of your data (so where no human has yet reviewed the outcome and criteria for the decision), where relevant;
* You can contact us to request to exercise these data subject rights at any time by contacting us in writing to: Nationwide PPI Advice, 28 Queens Road, Blackburn, Lancashire, BB1 1QG or via email to info@nationwideppiadvice.co.uk;
* If we choose not to action your request, we will explain the reasons for our refusal.

**Your right to withdraw consent**

Whenever you have given us your consent to use your personal data, you have the right to change your mind at any time and withdraw that consent.

* **Where we rely on our legitimate interest**

In cases where we are processing your personal data based on our legitimate interest, you can ask us to stop for reasons connected to your individual situation. We must then do so unless we believe we have a legitimate overriding interest and reason to continue processing your personal data. We must explain our reasons to you.

* **Where we rely on our contract with you**

In cases where we are processing your personal data based on our contractual relationship, you can ask us to stop for reasons connected to your individual situation. We must then do so unless we believe we have anoverriding interest based in contract to continue processing your personal data. We must explain our reasons to you. If the removal of such consent to processing effectively frustrates the contract being fulfilled and/or terminates the contract, you may be liable to a termination fee in respect of services carried out up to the point of termination (as per the terms and conditions of the contract as signed).

* **Direct marketing**

You have the right to stop the use of your personal data for direct marketing activity through all channels, or selected channels. We must always comply with your request.

* **Checking your identity**

To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make under this **Privacy Policy**.

If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act.

1. **How can you stop the use of your personal data for direct marketing?**

There are several ways you can stop direct marketing communications from us:

* Click the ‘unsubscribe’ link in any email communication that we send you. We will then stop any further emails from that part of the business (e.g. marketing);
* Write to us at Nationwide PPI Advice, 28 Queens Road, Blackburn, Lancashire, BB1 1QG or via email to info@nationwideppiadvice.co.uk
* Call us on 0161 524 0876

Please note that you may continue to receive communications for a short period after changing your preferences while our systems are fully updated.

1. **Contacting the Regulator**

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioner’s Office (ICO).

You can contact them by calling: 0161 524 0876. Or go online to [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns) (opens in a new window; please note we cannot be held responsible for the content of external websites).

By using our services, browsing our website and/or agreeing to receive digital direct marketing communications, you agree that we may process your personal data as described in this **Privacy Policy** and our **Cookies Policy**, including for analytics and research into website use.

1. **Any questions?**

We hope this **Privacy Policy** has been helpful in setting out the way we handle your personal data and your rights to control it.

If you have any questions that have not been covered, please contact our Data Protection Officer who will be pleased to help you:

* Email us at: info@nationwideppiadvice.co.uk
* Or write to us via: Nationwide PPI Advice, 28 Queens Road, Blackburn, Lancashire, BB1 1QG
* Call us on 0161 524 0876