

HOW WE USE YOUR PERSONAL INFORMATION

This leaflet provides a summary of how we, Think Money Limited, will use the personal information we collect about you and the types of organisations who we will share your personal information with.

You can also read our more detailed privacy policy to find out further details on how we will process your personal information. You can find our privacy policy on our website or request a copy by contacting us.

Who we are and how you can contact us

Who	We are Think Money Limited, company number 5530040
Address	thinkmoney, Think Park, Mosley Road, Trafford Park, Manchester M17 1FQ
Phone	0161 779 5000
Email	info@thinkmoney.co.uk
Website	www.thinkmoney.co.uk

What personal information will we collect from you?

To enable us to provide you with our services we will collect the following categories of personal information:

- your personal details (e.g. name, date of birth)
- address details
- contact details (e.g. phone number, email address)
- ‘Special Personal Information’
* (e.g. health information)
- financial information
- employment information
- information on how you use our website(s) and products and services

Special Personal Information

* Data protection law defines some categories of personal information as “special categories of data”.

This includes information about health, religious beliefs, race or ethnic origin, political opinions, trade union membership or biometric data. We will only collect and store this information where either we have agreed it with you first, or we have a legal obligation to do so, and it is necessary to provide our services.

Any personal information about you relating to criminal convictions or offences may only be used by us when authorised by law.

How we will use your personal information

We can only use your personal information where it falls into one or more of the following categories:

1. it is necessary to fulfil a contract we have with you;
2. you have provided your consent;
3. we have a legal or regulatory obligation to do so;
4. it is necessary to carry out a task which is in the public interest;
5. it is necessary to protect your vital interests;
or
6. it is in our legitimate interest to do so and it is not against your rights.

The table below sets out how and why we may use your personal information

HOW WE MAY PROCESS YOUR PERSONAL INFORMATION	WHY WE NEED TO PROCESS YOUR PERSONAL INFORMATION
To allow us to set up and run your account, for example: <ul style="list-style-type: none">• setting up and processing payments to and from your account• sending you your thinkmoney Card• keeping you updated about your account• responding to any complaints• checking your personal information against credit reference agencies and fraud prevention agencies	To fulfil our contractual agreement with you by providing you with the services under the account and also to comply with our legal and regulatory obligations.
We may ask you to provide a review about the service we have provided to you or carry out marketing research.	We have a legitimate interest to develop our products and to enable us to identify where we may need to improve our service or understand what you may like about our service.
Sharing information with regulators	We have a legal and regulatory obligation to provide information to our regulators if requested to do so.
Recording calls and retaining your personal information	We record our telephone calls we have with you. We will retain calls and other personal information we hold about you, in most cases for at least 6 years after you are no longer our customer or 6 years from the date the telephone call was made. We have a legal and regulatory obligation to keep copies of this information.
Providing you with updates about other products, services and promotions	We will provide you with this information where you have provided your consent to receive such information or where we may have a legitimate interest to carry out direct marketing activities.

Who we'll share your personal information with

WHO	WHY
Banks and other financial institutions	To allow us to send and receive payments into your account.
Regulators	Our regulators, such as the Financial Conduct Authority and the Information Commissioner's Office may request certain information as part of supervising us.
Credit Reference Agencies and Fraud Prevention Agencies	<p>When you open an account or wish to apply for any credit product through us we will share your information with Credit Reference Agencies (CRA) to search the information they hold about you. The CRA will add details of any searches to your credit record, which can be seen by other organisations.</p> <p>You can find out more about how CRAs use your personal information in the Credit Reference Agency Information Notice. This is available within our Privacy Policy or from the three main CRAs – Callcredit; Equifax; and Experian.</p> <p>We will share your personal information with Fraud Prevention Agencies who use it to prevent fraud, money laundering and terrorist financing.</p>
Trusted service providers	<p>We will share your personal information with other companies who provide us with services which enable us to provide our services to you. This will include IT service providers, professional advisors and insurers, communication service providers, printers, advertisers and social media platforms.</p> <p>We'll only share your information if they've agreed to keep it confidential.</p>

Using your personal information outside the European Economic Area (EEA)

We will only share your personal information outside the EEA where we have your consent; to comply with a legal obligation; or where we work with a business partner to enable us to provide you with our services, and they process information outside of the EEA.

If we do share your information outside of the EEA we will make sure that it is protected in the same way as if it was being used in the EEA. The European Commission Justice website and our Privacy Policy provides more information about the mechanisms that we may use to ensure your personal information is appropriately safeguarded.

Your rights

You have a number of rights in how your personal information is processed. You can contact us to

request for your information to be corrected, deleted or not used in a particular way, withdraw any consent given, request copies of the information we hold or request for it to be shared with another party. Our Privacy Policy will contain more information about these rights and how you may exercise these rights.

What you should do if you're not happy with how we process your personal information

If you're not happy with how we may be processing your personal information you should contact us. If you're not happy with how we have dealt with your complaint you have the right to make a complaint with the Information Commissioner's Office.

You can find their details on their website at:

<https://ico.org.uk/>