

Group Privacy Notice

Group Privacy Notice

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Group Privacy Notice

How to contact us

We are a member of NM Money Holdings Ltd. As a group of companies we are registered in England and Wales. The NoteMachine Group of companies (Group) consist of:

© 2017 NoteMachine Group | Registered in England & Wales
(<https://www.notemachine.com/about-us-our-group>)

NoteMachine – Registered No: 01359357 (<https://www.notemachine.com/>)

Eurochange – Registered No: 02519424 (<https://www.eurochange.co.uk/>)

NM Mortgages – Registered No: 05336870 (<https://www.nmmoney.co.uk/>)

TestLink – Registered No: 02598460 (<https://www.testlink.co.uk/>)

Our Registered Office: Russell House, Elvicta Business Park, CRICKHOWELL, Powys, NP8 1DF

If you have any questions about our Privacy Policy or the information that we hold about you, please contact us in writing by email at datacontroller@notemachine.com or by post to the Data Protection Officer to: NoteMachine Group, PO Box 435, Stevenage, Hertfordshire SG1 9GA, alternatively you can find contact details relating to each group company on our respective websites.

Introduction

When you register/open an account with us or ask us to provide you with any of our products or services, you are agreeing that we may handle your information in accordance with this Privacy Policy and other associated policies relating to the protection of personal and sensitive data.

We use your information only in accordance with this Privacy Notice and take all necessary steps to ensure we keep your information secure.

This policy should be read carefully along with our Terms & Conditions (T's & C's); by accessing our websites you confirm that you have read, understood, and agreed to them.

What information we collect

We collect basic personal information, but also more detailed records may be requested for us to manage our regulatory obligations.

- name, address, date of birth, email address, country of birth, passport details, driving licence details, source of wealth/funds, your preference for marketing purposes
- employee data, inc. education, references, criminal and financial
- images of individuals (CCTV, proof of ID), voice recordings and biometrics (fingerprints)
- website user statistics, inc. IP addresses, social media, smart device information, geolocation, searches and site visits and other identifying information
- payment details using a trusted third-party provider

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We collect special category data regarding health for colleagues and for applications for mortgages/insurance services.

We may collect information relating to criminal convictions (current or spent), offences, CCJ's, etc., where permitted in law for the purpose of a criminal reference check.

How we collect your information

Most of the personal data that we process is provided to us directly by you or your business (directors, officers, and ultimate beneficial owners). We will collect your information when:

- you apply for employment
- you register/onboard with us
- you speak with us over the telephone, when you write to us (by post or by email)
- you transact with us or use our products and services either in branch, online or at your place of work/business
- when you visit our website. We may use cookies to collect information about your use of our website and the devices that you use

Information may also be obtained from third parties and other NoteMachine Group of companies, such as:

- credit agencies, fraud prevention, law enforcement, government departments/agencies, accreditation/licensing providers
- open source and online search services, i.e. media, electoral registers, Companies House
- social media, inc. Facebook, Twitter, TikTok, LinkedIn etc.

Cookies

In general, you can visit NoteMachine Group websites without identifying who you are or revealing any information about yourself. However, cookies are used to store small amounts of information on your computer, which allows certain information from your web browser to be collected.

Cookies are widely used on the internet and do not identify the individual using the computer, just the computer being used. Cookies and other similar technology make it easier for you to log on to and use our websites during future visits and some are essential to facilitate our online ordering services.

- By using and browsing our websites, you consent to cookies (where appropriate) being used in accordance with our Cookies Notice. If you do not consent, you can disable cookies or stop using our website. You can disable cookies through browsers settings or within your email programme.
- When you use affiliate sites, webchat, social media, we will track your details to enable us to meet our contractual obligations to our service providers and to assess your response to advertising campaigns

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How we use your information

Employment checks

All employees of the Group are subject to the pre-employment checks such as references and may be subject to credit scoring, SIA licence and DBS checks. These checks are conducted due to the nature of risk associated with the type of business that we operate and that we operate within highly regulated industries.

Registration and administration

We use your information to enable you, once your registration/onboarding is complete, for the administration of your account, to contact you, to update our records about you, and to respond to and process your queries and requests. Personal information may be checked against third party/independent systems that review the electoral register and other databases to validate your identity.

Monitoring

We record and may monitor and use:

- CCTV, telephone calls, and transcripts of our telephone calls with you in case we need to check we have carried out your instructions correctly, to resolve queries or issues, for regulatory purposes, to help improve the quality of our service. Conversations may also be monitored for staff training purposes.
- transactional information to help to detect or prevent fraud or other crimes
- credit reference checks, political exposure, and family related associates

Automated decision making

Whilst we currently use some automated systems that are designed to assist us in identifying individuals for employment and transacting purposes, we ensure that any automated decision is always reviewed by the business and arbitrated with human intervention.

Profiling

Profiling' is the use of personal information to predict an individual's behaviour, such as their performance at work, economic situation, personal preferences, interests, reliability, behaviour, location, or movements etc.

Your information may be used:

- to carry out marketing analysis, e.g., we look at what you have viewed on our sites and apps, what products and services you have bought, to better understand what your interests and preferences are, and to improve our marketing (if you have opted in to receive such information) by making it more relevant to you
- for statistical purposes such as analysing the performance of our sites and apps, to understand how visitors use them and where they are used

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Data sharing with third parties

NoteMachine Group

We may share your information with other members of the Group where we need to do so, to provide you with any of the products or services you have requested, where we have a lawful reason or where you have requested us to do so.

Your instructions

We may share your information with anyone (for example, an agent) who you have told us or, who we are otherwise aware, is acting on your behalf, or who introduces you to us, or who you have asked us to contact.

Prevention and detection of crime

The Group, and our products and services, are subject to laws and regulation for:

- money laundering
- fraud
- terrorist financing
- bribery and corruption
- sanctions

We may be required by this legislation, the regulators, by the Police or other law enforcement agencies (e.g., in connection with criminal prosecutions, money laundering or fraud investigations), by order of a court or otherwise by law to use and share your information in the detection, prevention or prosecution of crime, tax evasion, fraud or for audit purposes.

Credit controls or debt collection agencies

We may share your information with credit control or debt collection agencies, if you owe us money and we engage their services to recover funds owed to us by you.

On a business sale or purchase

If we decide we want to sell our business, or receive an offer to buy our business, we may have to share some of your information with a prospective purchaser and their legal, financial, or other advisers. In these circumstances, we will take appropriate steps to ensure that your information is properly protected.

Others

We do not sell, trade, or otherwise transfer to outside parties your personally identifiable information unless explicitly requested by you.

This does not include trusted third parties (inc. TrustPilot, in anonymised form) who assist us in operating our website, conducting our business, or servicing you, so long as those parties agree to keep this information confidential.

You may sometimes ask us about, or we may sometimes ask you if you are interested in, products or services which we are unable to provide but which someone else we know ("NoteMachine Group contact") may be able to provide (for example, travel or financial services). Please note that we are not responsible for and cannot be liable to you for any

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products or services of any NoteMachine Group contact or any acts or omissions of any NoteMachine Group contact.

Your information will be passed to third parties for the purpose of validating identity and for the completion of credit references and DBS checks for employees of the Group.

Information Sharing Outside of the UK

The nature of our products and services means that we may need to share your information with:

- people or businesses
- law enforcement, judicial, governments tax, regulatory or trade bodies

based in countries outside of the United Kingdom. All countries in the European Economic Area (EEA), which includes the UK, have similar standards of legal protection for your personal information.

We may, depending on your geographical location, run your accounts and provide other services from our offices outside the EEA (such as the USA and India) that may not have a similar standard of data protection legislation to the UK. If so, we will require your personal information to be protected to at least UK standards and any reciprocal adequacy controls that the UK has agreed.

We may process payments through other financial institutions such as banks and the worldwide payments system operated by the SWIFT organisation if, for example, you make a CHAPS or a foreign payment.

These external organisations may process and store your personal information abroad and may have to disclose it to foreign authorities to help them in their fight against crime and terrorism.

The countries to which we may need to send your information would normally be obvious to you, (e.g., if you have instructed us in connection with a purchase of a property in France then, we will usually be dealing with people or businesses based in France (which may include banks, lawyers and estate agents) that are connected with the purchase in order to fulfil our contractual obligations to you).

In many instances we will be dealing with people or businesses which you have asked us to deal with or who you already know or who already know you.

If these are based outside the EEA, your personal information may not be protected to standards similar to those in the UK.

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Lawful bases

Under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 ('the Act'), the lawful basis for processing your personal data is:

Your consent

We obtain marketing preferences and consent from you during the registration and onboarding process and during transactions where you can opt in, to receive information relating to our products and services.

Your preferences can be updated or withdrawn by:

- accessing the preferences section of your registration/account
- by visiting one of our branches
- by calling or writing to our customer support team (contact details can be found on the relevant group companies' website)
- by contacting your account relationship management team

All of the above will all be able to update your information after having verified that they are managing your information. If you do opt out, you may still see some generic, non-personalised advertising when you are using our online services, and we may, from time to time, provide you with servicing messages.

You can also use our unsubscribe function that is available on all of our communications with you via email.

We will not provide information about you to companies outside our Group to use for their own marketing purposes unless you have given us your consent to do so.

Our contractual obligations

The Group use your personal information to:

- to register your interest with us
- to open an account and meet our contractual obligations to you
- to provide you with products and services which you use, or information on similar products or services which we think may be of interest to you (if you have opted in to receive such information). This may include information concerning promotions or offers
- notify you about changes or developments relating to our products and services that you use

We might contact you by post, telephone, email, or text unless you have asked us not to. If you are a registered client/customer, we may also display personalised advertising to you when you use our online account service and mobile app.

Our legal obligations

We are required by law to collect, process, and retain information about you. We do this when we:

- open registrations/accounts
- confirm your identity, source of wealth/funds

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- monitor transactions for the detection and prevention of crime. We may require the gathering of information on suspected financial crime and fraud and may require this information to be shared with law enforcement and regulatory bodies
- assess credit worthiness of individuals and businesses
- share information with third parties such as the regulators, by the Police or other law enforcement agencies (e.g., in connection with criminal prosecutions, money laundering or fraud investigations), by order of a court or otherwise in the detection, prevention or prosecution of crime, tax evasion, fraud or for audit purposes
- investigate and resolve complaints
- investigate breaches of conduct, policies, and procedures by our colleagues

Our legitimate interests

To ensure that, as a business, we are providing the most appropriate products and services and to continue to improve and develop our customer facing propositions we will use your personal data to:

- research your experience with us and to monitor the products and services that we have provided to you
- assess the quality of our customer service and to provide training for our colleagues. Calls to our customer support team and other communications may be recorded and monitored for these purposes
- analyse customer complaints – to understand processing errors/failures and to improve our service provision

Retention and storage

The Group will retain your details for as long as they are needed for the relevant purposes listed under the 'How we use your data' and the 'Data Sharing' section of this notice. When your personal information is no longer needed as defined by our Retention Policy.

Each group company has different retention periods depending on the product or service that they provide, e.g.:

- eurochange – 5 years after the date of the last transaction for FX products
- NM Mortgages – 10 years after the end of the policy

Data will be deleted or anonymised when no longer needed. Databases are managed with systemised housekeeping programmes to identify when the correct time period has elapsed and will automatically operate on a daily basis.

We may retain certain records for other legitimate purposes (including after your relationship with the relevant group company has ended), e.g., to resolve any potential disputes, cross-check against future applications and to comply with other reporting, legislative and retention obligations.

Where there is a legal requirement to segregate data from the destruction process, this is managed according to our Retention Policy and flagged within the system, and when no

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longer needed for complaint handling or for the detection/prevention of crime, it will be unflagged for the automate process to complete.

Information security

All data that we collect is held on servers located within the EEA, is kept secure, and personal/sensitive data is only accessed by authorised personnel.

We use industry-standard products to protect our systems and your personal data, which is held on our servers, and we ensure that any third parties, with whom we share your information, has the same level of protection. Regular testing is conducted on our systems to ensure that they remain secure.

Data Protection Act and your rights

We are required to handle information which we hold about you, that is capable of identifying you (either alone or with any other information we may hold about you) in accordance with the Act, which regulates the use of “personal data” in the United Kingdom.

- **Your right of access** – You have the right to ask us for copies of your personal information
- **Your right to rectification** – You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information that you think is incomplete
- **Your right to erasure** – You have the right to ask us to erase your personal information in certain circumstances
- **Your right to restriction of processing** – you have the right to object to the processing of your personal information in certain circumstances
- **Your right to object to processing** – You have the right to object to the processing of your personal information in certain circumstances
- **Your right to data portability** – You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us, in writing at datacontroller@notemachine.com or by post to the Data Protection Officer at: NoteMachine Group, PO Box 435, Stevenage, Hertfordshire SG1 9GA, alternatively you can find contact details relating to each group company on our respective websites.

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Children's Online Privacy Protection Act Compliance

We are in compliance with the requirements of COPPA (Children's Online Privacy Protection Act) and we do not collect any information from anyone under 13 years of age. Our website, products and services are all directed to people who are at least 13 years old or older.

Changes to our policy

We reserve the right to change our policy at any time. When we do make changes, we will update our Privacy Notice on our website. We recommend that you check our website periodically for any changes which may affect you.

How to complain

If you have any concerns about the use of your personal information, you can make a complaint to us by writing to:

Data Protection Officer
NoteMachine Group
PO Box 435
STEVENAGE
Hertfordshire
SG1 9GA

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
WILMSLOW
Cheshire
SK9 5AF

Helpline number 0303 123 1113

ICO website: <https://www.ico.org.uk>

You can find out more about the Act and your rights by visiting the website of the Information Commissioner.

This policy was approved by the Board of Directors and is issued on a version-controlled basis under the signature of the Chief Executive Officer (CEO).