

Privacy Policy

Astute Finance Limited is committed to protecting and respecting your privacy.

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting www.ivaadvisorycentre.co.uk you are accepting and consenting to the practices described in this policy.

This privacy policy will apply to you if you provide your personal information to us, even if you decide not to go ahead with any product or service we offer.

For the purpose of the General Data Protection Regulation (the Act), the data controller is Astute Finance Limited, 19 Admanson House Towers Business Park, Didsbury, Manchester, United Kingdom, M20 2YY. If you have any questions about how we may use your personal information, you can contact us at the above address.

If you have any questions about how we may use your personal information you can contact us at the above address.

Last Updated Date: 14/02/19

1. Information we collect from you

The information we collect from you depends on the product or service you apply for, or the service that we provide to you. We will only collect information that we actually need, or where we're required to collect the information to enable us to perform our legal, regulatory or contractual obligations necessary to provide you with the products or services, or where we have your permission.

This will likely include the collection of:

- your personal details (e.g. name, date of birth)
- address details
- contact details (e.g. phone number, email)
- 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 personal information as "special categories of data". This includes information about physical or mental health, sexual life, religious beliefs, race or ethnic origin, political opinions, trade union membership or biometric data. This information may be necessary to collect when understanding the reason for your financial circumstances, or where it may help us to

provide a better service to you. For example, a period of ill health could have caused you to fall behind with your regular payments to your creditors.

Where we need to collect and process this type of data about you, by providing this information to us you give your explicit consent for us and any other third party to process this special data as set out in this privacy policy, unless we have a legal obligation to process this type of data.

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

Information about other people

If you provide personal information about someone else, for example when a joint application is made, you must do so with the permission of the other person. If you enter into a service jointly with another person (for example, a joint Individual Voluntary Arrangement), your personal information and any information about the service provided to you will be shared with the other person.

We will use the personal information about the other person in the ways as described in this privacy policy.

2. How do we collect your personal information?

We collect your information in a number of ways.

- When you make an **application** or **enquiry** to us either by phone, email, our website, by a third party or by any other means
- By adding **reviews** or interacting with us using **social media** such as Twitter or Facebook etc
- When we may need to obtain up to date information about you to meet our **legal** or **regulatory** obligations
- Where you have given **permission** for your information to be provided to us

3. How we 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 enter into or 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.

Initial Application/Advice

Where you make an application or enquiry for one of our products or services we'll use your information to provide you with appropriate information to recommend a suitable debt solutions

and refer you to our chosen debt solution provider. If you cannot provide this information we may not be able to progress with your application or enquiry.

If, based on the information you've provided, to identify your eligibility for a product or service we provide, we may share your data with G&H Solutions Limited or Freeman Jones Limited who may contact you to discuss your application and may ask for some further information to determine whether we may be able to provide a product or service to you. If they do identify that we may be able to help you they will refer you and your information back to us.

We may also use this information to contact you about and process your application, for example, sending you an email, text message or letter to welcome you to our services.

We will process the personal data we collect about you for the purposes set out below at Purposes for Processing your Personal Data.

After you have made your initial application/enquiry, if you also decide to go ahead with any of the products or services that we offer, the sections below explain how we will also process your data when we provide that particular product(s) or service(s).

Debt Advice

If we give you advice regarding insolvency solutions, this will be provided by Astute Finance Limited. The table below specifically explains how and why your personal data will be used so that the services can be provided to you. When providing you with debt advice we collect and use your personal information under the lawful basis of our legitimate interest and is necessary to enable us to provide you with the best advice possible.

What personal data will we need to collect?	<p>To be able to provide you with advice regarding insolvency solutions we need to collect certain categories of personal data. This will include:</p> <ul style="list-style-type: none">• Contact details – so that we can contact you about and process your enquiry• The people you owe money to and your property and assets – so we fully understand your financial situation and give you personalised advice that's tailored to you• Your Income and expenditure – so that we can accurately work out what you can afford to pay towards your debts and make sure the solution we recommend is the right one for you• Personal circumstances – such as your employment, living arrangements and financial dependents, so that we can understand and give you advice about how each of the available debt solutions could affect you• Special personal information – only with your permission and where this is relevant to your financial situation and how a debt solution needs
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	<p>to work for you, or where we have a legal right to do so. With your permission, we may use information from your credit file to confirm certain information, including about your lenders, balances, account numbers, your account, address and insolvency history and details of any county court judgments (CCJ). Your credit file data will be provided by Callcredit Consumer Ltd, and CCJ data by Callcredit Ltd subject to passing their authentication process.</p>
<p>Who will the data be shared with?</p>	<p>We may share your information with our Debt Solution Providers. i.e. IVA companies who provide and administer the plan. We will only share your information with them if they've agreed to keep it confidential.</p> <p>Our regulators, such as the Insolvency Practitioners Association, the Information Commissioner's Office or any other regulatory body or authority may request certain information as part of supervising us. We have a legal or regulatory obligation to provide this.</p>
<p>How long will your data be stored for?</p>	<p>If you continue to be our customer and we give you advice, we will keep a record of your personal information to ensure that we provide you with the best service possible and where we're required to keep your data to meet our legal and regulatory obligations. This will normally be kept for at least 6 years, starting from the date when we are no longer providing you with a service. Telephone calls will be retained for at least 6 years from the date the call was made.</p> <p>If you do not go ahead with any product or service offered by us, your personal information will normally be deleted after 2 years (except for any recorded telephone calls) unless we have another reason to keep your personal information, for example, if you have given your consent to receive marketing or promotional messages from us.</p> <p>After this time, we will delete the information or anonymise the data so that it cannot be linked back to you.</p>

Other Purposes for processing your Personal Data

Websites and marketing

To help us understand you better and provide you with information about other products which may be suitable and relevant, we will use your personal information to create a profile of you and your circumstances. This allows us to provide more relevant, accurate and tailored services to you. For example, we may assess your income and expenditure to determine whether you would be eligible

for a debt solution through us. We believe we have a legitimate interest to do this and that it is not against your rights.

However, if you don't want us to profile your personal information this way, to then better enable us to tailor any marketing communications to you, you can contact us to let us know that you wish for your personal data not to be used in this way.

Legal or Regulatory Obligation

We are required to process your personal information where we have a legal or regulatory obligation to do so, for example, to adhere to anti-money laundering or our regulatory obligations.

Responding to complaints or enquiries

If you make an enquiry or complaint with us, we will use your personal information to investigate the complaint and deal with your enquiry. We have a legal and regulatory obligation to deal with your complaint appropriately.

Internal Analysis

As part of our legitimate interest to develop our business and our products we will use your personal information to assess our performance as a business and for statistical analysis. We will use your personal information to assess our performance as a business and for statistical analysis. We will use as little personal data as we can to achieve this

4. Who do we share your information with?

We may also share your personal information with the following organisations:

- IT Service Providers who provide IT platforms or other IT services
- Advertisers and social media companies such as Facebook, Google and Twitter for our social media accounts or where we can contact you using your social media account
- Communication providers (e.g. telephone line providers, and email and text service providers). This may also include WhatsApp where you have agreed that we may communicate with you using WhatsApp's services. You can find more information about how WhatsApp may use your personal information by reading their privacy policy within their App.

These companies help us to provide our services to you. We will have a contract in place with any provider who directly provides us with such direct services to ensure that they comply with their data protection obligations and ensure that they have appropriate security measures in place.

We may also share your personal information where we have your consent to do so or where we're required to do so under a legal or regulatory obligation or court order, such as the police, local authorities or the courts.

5. Fraud Prevention and Law Enforcement Agencies

The personal information we have collected from you may be shared with law enforcement agencies and fraud prevention agencies who will use it to prevent fraud, money-laundering and terrorist financing and to verify your identity. If fraud is detected, you could be refused certain services, finance or employment. Further details of how your information is used by us and these fraud

prevention agencies, and your data protection rights, can be found by contacting us at the address above.

6. Social Media

We use publicly available social media platforms to promote our services, to provide updates and to share any news and promotional updates. We may collect personal information from these social media platforms, for example, if you post a message on our Facebook page. By providing any of your information to us through these platforms you should be aware that:

- the social media web pages are publicly available and you must not provide any personal or sensitive information on our pages that are accessible to the public, such as your account information. We may ask you for your account information via a private message to identify you and to service any request you make; and
- each social media platform will process any personal information you provide through the platform and will be processed in accordance with its own privacy policy. The privacy policies are available to view on each social media platform.

7. Sharing your information outside of the EEA

We will only share your personal information outside the European Economic Area (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 to ensure appropriate safeguards are in place. This may include putting in place a contract with the business partner that means they must protect the personal data to the same standards as the EEA (this may include defined model clauses), or only share the data to a business partner in a non-EEA country where the privacy laws provide the same protection as within the EEA or where they are part of a Privacy Shield.

More information on this can be found on the [European Commission Justice Website](#).

8. Security

We take the protection of personal information very seriously and we will maintain appropriate measures to maintain the confidentiality, integrity and availability of the information you have provided. Such measures include:

- Company security policies and standards
- staff security awareness
- role based access controls to prevent unauthorised access to the information
- encryption and anonymisation technology
- anti-malware technologies
- security monitoring
- security testing
- secure archiving and deletion

- compliance with industry regulation and legislation

9. How we may contact you about the products and services we provide to you

To help us keep you up to date about the products and services that we provide to you, and to ensure that you're kept fully informed, we may contact you by letter, telephone, email, text message, push notifications, social media or may send you messages by any online customer platforms or other electronic means.

If you start an application for a product or service through us we will attempt to contact you shortly after if you were unable to complete your application for whatever reason.

If you do not want to be contacted in a particular way then you can request this at any time, but if we are providing a service to you, we do need to be able to send you communications. This can often be due to a legal or regulatory requirement.

It is important that you keep us up to date when you change your contact details to ensure that we use your up to date contact information.

10. Your Rights

Access to your personal information

You have the right to request from us a copy of the personal information that we may hold about you. This is often called a "Data Subject Access Request". You can request this information for free by contacting us as set out below.

Before providing this information to you or to another person or company where you have requested this personal information to be sent to, we may ask for proof of identity or ask sufficient questions to enable us to locate the information and ensure that we're only providing it where you have given your agreement.

Right to have your personal information corrected

If the personal information we hold about you is incorrect you have the right to request that we correct this.

Right to stop or limit the processing of the data we carry out

You may request that your personal information is deleted or that we stop processing the information if we're no longer entitled to process it. There may be occasions where we are unable to delete the data due to our legal or regulatory obligations. We will however discuss this with you if you request for your information to be deleted.

Portability

In some cases you may be able to request for your information to be provided to you or to another company in a format that can be processed electronically by you or the other company. If you want to request this you'll need to contact us.

11. How long do we keep your personal information for?

Whilst you continue to be our customer, we will keep a record of your personal information to ensure that we provide you with the best service possible and where we're required to keep your personal information to meet our legal and regulatory obligations. The product specific information

above sets out how long your personal information will normally be kept for. Telephone calls will be retained for at least 6 years from the date the call was made.

If you do not go ahead with any product or service offered by us, your personal information will normally be deleted after 2 years unless we have another reason to keep your data, for example, if you have given your consent to receive marketing or promotional messages from us.

12. How we may contact you about other products or services that we may offer

If you have provided us with your consent or where we are legally entitled to do so, we may contact you to let you know about other offers, products and services that we provide which we think you may be interested or that may benefit you. We may do this through post, emails, text messages, telephone, push notifications, social media or other electronic means.

You can easily let us know at any time if you would no longer like to receive these messages. You can contact us using the details below, or unsubscribing using the link or information within the message.

13. Other types of advertising

When you visit our website or similar websites Google may use our advertisements promoting our products and services which may appear on other third party websites you visit across the internet for remarketing purposes, including cross-device remarketing. Google and other third parties will use cookies to tailor advertisements for website users based on their previous visit to our website. More information about cookies can be found below.

We do not have any control over the advertisements you see on other third party websites however you can request to opt out or customise these advertisements by using the [Google Ads Preference Manager](#).

14. Recording Calls

We record any telephone calls you make to us or we make to you or any other third party. This is for training, monitoring and quality purposes and to meet our legal and regulatory obligations. Some telephone calls may be observed by staff for training and development purposes.

We may keep a copy of the telephone calls for up to 6 years from the date the telephone call was made.

15. Contact us

If you have any questions or queries about how we use your personal information you can contact us or our Data Protection Officer using the address:

Astute Finance
19 Adamson House Towers Business Park
Didsbury
Manchester
M20 2YY.

If you are not happy with how we process your personal information you should contact us in the first instance. If you're not happy with how we have dealt with your complaint you have the right to lodge a complaint with the Information Commissioner's Office. You can find their details on their website at <https://ico.org.uk>.

16. Updates to this privacy policy

Any updates to this privacy policy will be found on this page. If we make any important or significant changes to the way we may collect and use your personal information we will endeavour to notify you of this change.

17. Cookies

When using this website, some information may be collected automatically using 'cookies'. These are small text files that facilitate the processing of your data and enable us to analyse how the website is being used. Cookies can be temporary or permanent.

Temporary cookies form part of the security process while you are using the website; permanent cookies identify the link you used to find our website, check your browser so that we can make sure that our website and services work well with your computer and to help us monitor traffic on our website.

Why are cookies used?

They help visitors. Cookies allow sites to do things like provide personalised content and remember their log-in details and settings. You can turn them off - this won't stop a website from working, but it might mean it won't work as well as it could, or that you have to do the same thing more than once.

They help website owners. Cookies tell website owners things like: what search engine a visitor used to find the website, how often they've visited it, how long they've spent on it, and so on.

We've set out below the cookies that we may use and those that are set by third parties on our website.

Cookie	Name	Purpose	More Information
All Response Media	_pk_(x)	This cookie is used to collect information about how visitors use our website and allows us to compile reports to further improve our website.	Click here for more information about All Response Media cookies
AppNexus	anj, uuid(x), sess	Display advertising cookie	Click here for more information about Outbrain cookies

Cookie	Name	Purpose	More Information
Bing Ads	mui(x), _uet(x)	Remarketing script and conversion tracking	
Cloud Flare	_cfduid	Security and performance script	Click here for more information about Cloud Flare cookie.
DoubleClick Cookies	_ide, _nid, _ssid, _dsid	These are 3rd party cookies served by DoubleClick. They serve adverts to visitors based on the websites they've been to previously.	Click here for more information about DoubleClick and how to disable this cookie.
Facebook	fr	Remarketing and conversion tracking	Click here for more information about Facebook cookies
Google Analytics	_utm(x), _ga(x), _gid, amp_token	These cookies are used to collect information about how visitors use our website. They keep track of when a visitor enters and leaves the website and any search engines and keywords that are used, including any personal and/or special categories of data.	Click here for more information about google analytics and how to disable this cookie.
Marin Software	_msuuid, _msuuid_(x)	Remarketing and conversion tracking	
Microsoft	ai_(x)	Web performance monitoring	

Cookie	Name	Purpose	More Information
Azure			
Session Variables	ASP.NET_SessionId ASPESSIONID	These cookies are used to keep all information about the visitor's session of the website and are essential for the website to work. These expire when the browser is closed.	
Session Variables	VISITOR_INFO1_LIVE	This tracks a layout version that the YouTube applet will use when displayed on the website.	
Our Cookies	__sid	used for session tracking	
Our Cookies	__af	used to store internal system information	
Our Cookies	_culture	language code e.g. 'en-GB'	
Our Cookies	HasMarketingConsent	This allows the website to identify when a customer has started a journey in response to an e-mail	
Our Cookies	Sourceld	This allows the website to identify which source the customer has entered the website from	
HotJar	_hk(x)	These cookies are used to record anonymous videos about how visitors use our website. they keep track of how visitors engage with pages on our website.	Click here for more information about Hotjar and how to disable the cookie

Except for essential cookies, all cookies will expire after 10 years.

Disabling/Enabling Cookies

You have the ability to accept or decline cookies by modifying the settings on your browser and by clicking on the disable button below. Please remember though that disabling certain cookies may affect the functionality of our website.

How to disable cookies

If you are using Microsoft Windows Explorer:

- Open 'Windows Explorer'
- Click on the 'Search' button on the tool bar
- Type 'cookie' into the search box for 'Folders and Files'
- Select 'My computer' in the 'Look In' box
- Click 'Search Now'
- Double click on the folders that are found
- 'Select' any cookie file
- Use the 'Delete' button on your keyboard

If you are not using Microsoft Windows Explorer, then you should select 'cookies' in the 'Help' function for information on where to find your cookie folder.

We do not pass on, or sell cookies to any other companies. Further information on the use of and managing cookies can be found at <http://www.allaboutcookies.org>

None of the features of our website will be affected - giving you the full experience.

For detailed information on the cookies we use and the purposes for which we use them see our [Cookie policy](#).