

Privacy Policy

Who are we?

TIPTech Ltd (T/A Trustfolio Debt Adviser Support Portal) acts as an intermediary and technology service provider between debt advisors ("advisors"), providers of debt solutions and consumers. We do not directly provide or administer debt solutions.

Advisors and solution providers using our services may provide and/or administer popular debt solutions in England, Wales, Northern Ireland and Scotland including, but not limited to, Individual Voluntary Arrangements (IVAs), Debt Management Plans (DMPs), Debt Relief Orders (DROs), Bankruptcy, Trust Deeds and Sequestration.

Our role is to improve the speed and quality of debt advice and solutions by providing access to accurate data through technology. We work with a panel of carefully selected agencies who are not employed by TIPTech but providers of debt solutions. We can, if required, refer cases to for them to provide debt advice to consumers ("debt solution panel members").

Our postal address is: -

TIPTech Ltd 6th Floor
49 Peter Street
Manchester
M2 3NG

Email – adviserportal@trustfolio.co.uk

We are registered with the Information Commissioner's Office (Reg. No. ZA309410).

TIPTech Ltd treat privacy very seriously and we want you to feel confident about how we process personal data. The notice below outlines how we process personal data in accordance with the law.

Types of personal information we collect

We currently collect and process the following information:

- Personal identification information (name, email address, postal address, phone number, date of birth)
- Details of your situation as described to us by third parties (please see 'How we get your information' below). This includes financial information relating to your income, expenditure, assets, and any debts you may have.
- Sensitive personal data known as Special Category data which includes health information relevant to your income, expenditure and your ability to deal with your debt.
- Some data is automatically collected from your computer. You can read more about below under our Cookie Policy

How we get your personal information

The personal data that we collect is obtained from various sources as listed below:

- Directly from you
- From your advisor
- From Credit Reference Agencies i.e. Equifax Ltd (for credit reports)
- From DVLA (for vehicle valuation)
- Data Sharing Platform – Consents.Online (for sharing bank transaction data)

Why we have your personal data

We do not provide debt advice, however, the advisors and debt solution providers described above, use our services to help identify the best debt solution for you. They may ask us for information on some or all the following:

- your Credit Report
- your bank transaction data
- your vehicle details for valuation purposes: or
- they may want us to pass your case on to one of the debt solution panel members we work with.

Who we share your information with:

- Your debt advisor
- The debt solution panel members who will use your personal data to determine whether to accept your case. If they do accept your case, they will contact you directly and issue you with their own privacy notice.
- Credit Reference Agencies i.e. TransUnion, Experian Limited

Our legal basis for processing your personal data

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

Consent

Consent for your data to be passed to us will be given to your advisor. When you agree to be referred to a debt solution provider you are consenting to this privacy notice and giving us permission to process your personal data specifically for the purposes identified above.

Where we rely on consent, you may withdraw this at any time. As your consent was not given to us directly, please contact your advisor to do this and they will contact us alternatively, you can email us at adviserportal@trustfolio.co.uk.

Legitimate interest

Once you have taken up a solution with a debt solution panel member, we may use your information in monitoring the overall performance of that panel member. Your name will not appear in any reports we create or use as you will only be identifiable by a unique reference number, we will pseudonymise your data.

How we store your personal information

TIPTech Ltd is committed to good data management to protect people from harm. All personal data provided to us is stored on our secure servers. We have appropriate security measures in place to prevent your personal data from being accidentally lost, used, or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

How long do we keep your data for?

- Credit Reports - will be stored for 30 days and then deleted.
- Banking Transaction Data - will be stored for 30 days and then deleted.
- Referrals to debt solution providers – will be stored until the debt solution is approved. If your debt solution does not proceed, data will be retained but pseudonymised within one month; this means that all personal information that can identify you is striped from the data.
- When you withdraw the consent you gave to your advisor and you have not taken a debt solution with a member of our panel, your data will be retained but pseudonymised within one month; this means that all personal information that can identify you is striped from the data.

Your data protection rights

Under data protection law, you have rights including:

- **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 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 ask us to restrict the processing of your personal information in certain circumstances.
- **Your right to object to processing** - You have the the right to object to the processing of your personal information in certain circumstances. This will not apply if we are processing your information based on your consent, however, you would still have the right to withdraw your consent.
- **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. This will not apply where we are processing your information based on our legitimate interest.

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 use the contact details at the top of this notice if you wish to make a request.

Complaints

If you have any concerns about our use of your personal information, you can make a complaint to us using the contact details at the top of this notice.

You can also complain to the Information Commissioner's Office (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>

Cookie Policy

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of the website and to compile statistical reports on website activity. These cookies are stored by the browser on your device. They can be used for a variety of purposes, such as identifying your previous visits to a website, researching the most popular features of a website.

For further information please feel free to visit our cookie policy page. You can set your browser not to accept cookies and the following websites (www.aboutcookies.org or www.allaboutcookies.org) tell you how to remove cookies from your browser. However, in a few cases some of our website features may not function as a result.

Google cookies

TIPTech Ltd uses Google Analytics to monitor the use of its website. Google Analytics generates statistical and other information about website use by means of cookies, which are stored on users' computers. The information generated relating to our website is used to create reports about the use of the website. Google will store and use this information. Google's privacy policy is available at: <http://www.google.com/privacypolicy.html>

Refusing cookies

Most browsers allow you to refuse to accept cookies. Please see below for further details:

Internet Explorer <https://support.microsoft.com/en-us/help/17442/windows-internet-explorer-delete-manage-cookies>

Firefox – <https://support.mozilla.org/en-US/kb/block-websites-storing-site-preferences?redirectlocale=en-US&redirectslug=Blocking+cookies>

Google Chrome – <https://support.google.com/chrome/answer/95647?hl=en-GB>

Safari – https://support.apple.com/kb/ph21411?locale=en_US

Opera – <http://www.opera.com/help/tutorials/security/privacy/>

Please note: The TIPTech Ltd website contains hyperlinks to websites owned and operated by third parties. These third-party websites will have their own privacy policies, including cookies, and we suggest that you check them. They will govern the use of any personal information which is collected by cookies while visiting these websites. TIPTech Ltd cannot accept any responsibility or liability for the privacy practices of such third-party websites and your use of such websites is at your own risk.

Additional references

Further information about cookies and how to control their use is available from All About Cookies– <http://www.allaboutcookies.org/> and Your Online Choices <http://www.youronlinechoices.com/uk/>.

Other websites

Our website contains links to other websites. This privacy policy only applies to this website so when you link to other websites you should read their own privacy policies.

Changes to our privacy policy and notices

We keep our privacy policy and notices under regular review and we will place any updates on this web page.

Definitions

The terms: data processor, data controller, data subject, personal data, sensitive personal data, processing and related terms have the same meaning as in the UK GDPR and the Data Protection Act 2018.