



TRANSUNION CONSUMER RESELLER

PRIVACY NOTICE

Version: 2.1 Date adopted: 10 October 2018

This privacy notice provides information about how we use and share personal data about users of the credit report services that we provide to consumers through our partners. It covers the following topics:

1. Who we are and how you can contact us
2. What we use personal data for
3. What kinds of personal data we use, and where we get it from
4. What our legal grounds for handling personal data are
5. Who we share the personal data with
6. Where the personal data is stored and sent
7. How long the personal data is kept for
8. Whether the personal data is used to make decisions about you or to profile you
9. Your rights in relation to the personal data we hold about you
10. Who you can complain to if you are unhappy about the use of your personal data

1. WHO WE ARE AND HOW YOU CAN CONTACT US

We are TransUnion Information Group (formerly Callcredit Information Group), which is a group of companies with headquarters at One Park Lane, Leeds, West Yorkshire LS3 1EP. Some of the members of TransUnion Information Group are listed in section 5 below.

TransUnion Information Group forms part of a larger group of companies. However, this privacy notice only covers the activities of TransUnion Information Group.

The TransUnion company which provides credit report data to consumers is Callcredit Limited. Callcredit Limited is a controller of the personal data that we are provided with about you by our partner or if you contact us using the details below. Callcredit Limited is also a controller of the credit data (and the other information relevant to your financial standing) that you can access through our partner's website. This means that Callcredit Limited is responsible for ensuring that the personal data it holds is used fairly and lawfully.

You can contact us by sending an email to consumer@callcreditgroup.com.

2. WHAT WE USE PERSONAL DATA FOR

This section explains the purposes for which we use personal data about you. More detail about the types of personal data that we might use for these purposes can be found in section 3 below.

Verifying your identity

The information you provide on signing up will help us to verify your identity so that we know we are providing your credit history to the correct person. We do this by checking the information you give us against databases such as the electoral roll and your credit file.

Providing products and services to you

We use personal data to provide you with information through our partner's website. Depending on what our partner makes available, this can include products and services such as:

- access to your credit reports and credit scores;
- credit alerts, which inform you about changes to your credit file;
- get statement, which provides reasons about why your credit score has gone up or down;
- what if tool, which shows examples of what might happen to your credit score in various scenarios, such as if you were to pay off a credit card or take out a new loan.

In some cases our partners may use the information to provide you with other products and services if you give them permission to do so.

Prevention and detection of fraud and other crime

In order to detect or prevent fraud (for example, to ensure that no-one has fraudulently accessed your account or to confirm you have only entered information about yourself), we may use personal data

from other sources to corroborate your details. We may use third parties to undertake these checks on our behalf.

Product or systems development and testing

We may sometimes use personal data while improving, developing or testing our products and systems. This includes making sure that our security measures are working properly. Where possible, we will anonymise or pseudonymise the data before doing this.

Legal and regulatory purposes

We may use your personal data for legal and regulatory purposes. For example, this might include responding to complaints or enquiries from you or a regulator about how we have used your personal data.

Combining data

The information you give us may be combined with other information about you that is obtained from other sources, and the combined data may be used in accordance with this privacy notice. For example:

- The information you give us may be compared with data available elsewhere to verify your identity or validate the information you have provided (for example in the context of anti-fraud measures).
- We may combine information about how you use our services with the other information we hold about you in order to help us develop a better and more detailed understanding of the way different types of individuals use our services.

3. WHAT KINDS OF PERSONAL DATA WE USE, AND WHERE WE GET IT FROM

We obtain and use information from various different sources. These are summarised in the following table.

Type of information	Description	Source
Name and contact details	This is basic personal data about you, and how to get in touch with you.	This information is usually provided directly by you through our partner. Some of it is also matched with data on your credit file.
Other identifying information	This is other information that we need to help identify who you are, such as your date of birth, address history and your credit or debit card details. In some cases, such as where you have changed your name, we may require physical documents such as a deed poll or marriage certificate.	

Your credit file	<p>This is information about your credit history, such your loans, mortgages and other credit arrangements, your repayments, and your financial associates. It also includes information such as court judgments, bankruptcies and IVAs that may have been made against you, as well as your current and previous names and addresses. We also keep a record of who has previously made searches of your credit file, and any disputes and queries that have been raised by you. Your credit file also contains fraud prevention indicators.</p> <p>More details about this information can be found at www.callcredit.co.uk/crain.</p>	<p>This information is gathered by Callcredit Limited in its role as a credit reference agency. Callcredit Limited supplies it to our partner so that they can provide it to you.</p> <p>Callcredit Limited gets the information from a range of different sources, including lenders. Information court judgments and insolvency-related events comes (indirectly) from the courts. Address information is obtained from the electoral register, which is supplied to Callcredit Limited by local authorities. Fraud prevention indicators are provided by Cifas.</p>
Contact history	<p>This is information about our contact with you.</p>	<p>We produce these records ourselves.</p>
Service usage	<p>This is information about the use of our services, such as the date and time your data was requested by our partner for you.</p>	
Third party data	<p>This information that we obtain about from third parties and associate with you.</p>	<p>We may obtain this data from various different data suppliers.</p>

You are free to choose whether or not you give us your personal data. However our partner might not be able to provide you with a product or service if you do not give us the information we need in order to make that product or service available.

4. WHAT OUR LEGAL GROUNDS FOR HANDLING PERSONAL DATA ARE

This section explains the basis on which we process your personal data in connection with our services. Our basis for acting as a credit reference agency is explained separately at www.callcredit.co.uk/crain.

Performance of our contract with you

Where we agree directly with you to provide you with our services, we have a right to use your personal data to the extent necessary in order to provide those services.

Legitimate interests

The UK's data protection law allows the use of your personal data where necessary for legitimate purposes provided that this isn't outweighed by the impact it has on you. The law calls this the "legitimate interests" condition for processing personal data.

The legitimate interests we are pursuing include:

Interest	Explanation
Promoting knowledge among consumers about their credit history and its implications for them. Allowing consumers to challenge incorrect data on their credit report.	It is important that consumers are well-informed about their credit history and how it may be taken into account by lenders. Where a consumer has been declined credit, we help them understand why this might be, and allow them to challenge information on their credit report if it is inaccurate.
Monitoring and securing our systems and data	Some of the ways we use personal data are justified by the need to ensure that our systems and the data we make available are kept secure and only made available to the correct people.
Commercial interests	Like any commercial organisation, we seek to earn revenue through the services that we provide to our customers and clients.

Legal obligations

We may use or supply your data to third parties to the extent necessary in order to comply with any legal obligations that we are under.

5. WHO WE SHARE THE PERSONAL DATA WITH

Our partner

We share your personal data with the operator of the website where you sign up to receive your services. This is necessary so that they can provide the information to you or use it in the ways that you have given them permission for.

Our group companies

We may share your personal data among the members of TransUnion Information Group. If we do so, then use of the data by those companies will be governed by this privacy notice. A list of relevant TransUnion Information Group companies is set out below, although the list may be updated from time to time.

Group company	Role	Main trading address	Registered office
Callcredit Information Group Limited (company no. 4968328)	Our holding company	One Park Lane, Leeds, West Yorkshire LS3 1EP	
Callcredit Limited (company no. 3961870)	Provider of the consumer credit reporting and identity verification services		

Callcredit Consumer Limited (company no. 7891157)	Provider of other TransUnion Information Group consumer services		
Recipero Limited (company no. 3794898)			
Recipero, Inc (company no. 5542430)		720 S. Colorado Boulevard, Penthouse North, Denver, Colorado 80246, USA	
Callcredit Operations UAB (company no. 302689020)	Provider of some back-office support functions	Zalgirio Arena, Karaliaus, Mindaugo pr. 50, Kaunas LT- 44333, Lithuania	Vilniaus m. sav . Vilniaus m. J. Jasinskio g. 16B, LT-01112, Lithuania

Service providers

We may provide your information to third parties who help us use it for the purposes described in section 2. For example:

- Our database of personal data may be hosted by third parties on our behalf.
- We might use market research companies to help us better understand our customers.

These service providers will not be allowed to use your information for their own purposes or on behalf of other organisations, unless you agree otherwise.

Business transfers

If we sell our business to a third party, or go through a corporate reorganisation, we will transfer personal data to the company that acquires the business.

Regulators

We may sometimes need to pass personal data to a regulator such as the Information Commissioner's Office.

Sharing of anonymised data with third parties

We may share anonymised information with other third parties, but only where the information cannot realistically be identified as relating to you.

6. WHERE THE PERSONAL DATA IS STORED AND SENT

Within Europe

We are based in the United Kingdom and will access and use your information from here. However, we also have operations elsewhere in the European Union – currently the Netherlands, Lithuania and Spain – and personal data may be accessed from there too. In these cases, the use of the information in those locations is protected by European data protection standards.

Elsewhere

We also send information elsewhere in the world. For example:

- Sometimes another group company or branch office based overseas may need to use the data in accordance with this privacy notice.
- We may use cloud-based technology or a data centre or backup facility overseas, and people in other countries may also need to access data for purposes such as technical support or system development and testing.

While countries within the European Union all ensure a high standard of data protection law, some parts of the world may not provide the same level of legal protection in relation to personal data. As a result, when we do send personal data overseas, we will make sure that suitable safeguards are in place to protect the information. For example, these safeguards might include:

- Putting in place a contract with the recipient containing terms which have been approved by the authorities as providing a suitable level of protection.
- Sending the information to an organisation which is a member of a scheme which has been approved by the authorities as providing a suitable level of protection. One example is the “Privacy Shield” scheme that has been agreed between the European and US authorities.

7. HOW LONG THE PERSONAL DATA IS KEPT FOR

We will keep your personal data for as long as you receive our services through our partner and for a period of two years from when those services stop. We keep the data for that extra period of time in case we need to respond to any enquiries from you (for example, if you have any questions about our use of your personal data), our partner, or from any regulators. We may keep anonymised data for a longer period of time for analysis purposes.

8. WHETHER THE PERSONAL DATA IS USED TO MAKE AUTOMATED DECISIONS ABOUT YOU OR TO PROFILE YOU

We perform the following automated decision-making and profiling activities using your personal data. When we refer to profiling, we mean using personal data to make predictions about you, or to categorise you into particular groups.

Identity verification

As explained in section 2 above, we will use the information you provide on registration to help us to verify your identity so that we know we are providing your credit history to the correct person. We do this by checking the information you give us against databases such as the electoral roll and your credit file. This is an automated process, and it can result in you being declined access to our services if we can't verify your identity.

Credit scores and ratings

Your credit score and rating is created from the information on your credit report. Please refer to www.callcredit.co.uk/crain to find out more.

9. YOUR RIGHTS IN RESPECT OF THE PERSONAL DATA THAT WE HOLD ABOUT YOU

You have several different rights in relation to the personal data that we hold about you. These are briefly described below. To enquire about exercising these rights, please use the contact details set out in section 1.

- **Access:** You have a right to find out what personal data we hold about you, and certain other information such as how we are using it.
- **Withdrawal of consent:** We do not rely on consent to process your personal data and so this right does not apply.
- **Objection to direct marketing:** We do not use your personal data for direct marketing purposes and so this right does not apply.
- **Rectification:** If the information that we hold about you is inaccurate or out of date, you have a right to ask us to correct it.
- **Objection to legitimate interests:** If you disagree with us relying on the legitimate interests grounds for using your personal data (see section 4 above), you can object to us doing so. We will then reassess the extent to which we can continue to use the data in light of your particular circumstances.
- **Erasure:** In certain circumstances you can ask us to delete your personal data from our systems. However, this usually won't apply to all of your data because we might have good reason for needing to keep some of it.
- **Restriction:** In some circumstances you can ask us to restrict the ways in which we use your personal data.
- **Portability:** You have the right to receive some limited kinds of information in a portable format. Please note that this does not apply to the information on your credit report.

Some special rules apply when you make a request about information on your credit report; please refer to www.callcredit.co.uk/crain to find out more.

10. WHO YOU CAN COMPLAIN TO IF YOU ARE UNHAPPY ABOUT THE USE OF YOUR PERSONAL DATA

We try to ensure that we deliver the best levels of customer service but if you are not happy you should make contact so that we can investigate your concerns. Please contact us by sending an email to customer.relations@callcreditgroup.com.

You can also contact our Data Protection Officer at dpo@callcreditgroup.com.

You also have the right to lodge a complaint with the Information Commissioner's Office (ICO), which is the body that regulates the handling of personal data in the United Kingdom. You can do this online through the ICO's website at www.ico.org.uk, by telephone on 0303 123 1113, or by writing to them at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF.