

PRIVACY NOTICE

We take your privacy very seriously. Please read this privacy notice carefully as it contains important information on who we are and how and why we collect, store, use and share your personal information. It also explains your rights in relation to your personal information and how to contact us or supervisory authorities in the event you have a complaint.

We collect, use and are responsible for certain personal information about you. When we do so we are subject to the [General Data Protection Regulation](#), which applies across the European Union (including in the United Kingdom) and we are responsible as ‘controller’ of that personal information for the purposes of those laws.

Key terms

It would be helpful to start by explaining some key terms used in this policy:

We, us, our	Telljo Limited with registered offices at 8 Sanditon Way, Worthing, BN14 9FF, United Kingdom and our group companies. For more information on other group companies contact us using the data in the Contact Information section at the end of this policy.
[Our data protection officer]	Dominic Maxwell email: dominic.maxwell@telljo.org telephone: +44 (0)7901 555230
Personal information	Any information relating to an identified or identifiable individual
Special category Data	Personal information revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership Genetic and biometric data Data concerning health, sex life or sexual orientation

This Privacy Notice covers the type of information we collect, how we collect it and what we use the information for. It covers information we collect about our clients (who are mainly service providers such as utility companies) as well as about their customers who are unable to make payments, or in early stages of potential financial crisis. We also collect information from visitors to our website and digital assessment and this privacy notice also covers all visitors to our website: www.telljo.org.

Personal information we collect about you

We may collect and use the following personal information about you:

- Name
- Address
- E-mail address
- Phone number
- Gender
- Business or company name
- Credit reference data (when you have given consent)
- Credit/debit card information
- Bank details that you have permitted us to use on your behalf
- Date of birth
- Information relating to your financial status
- People who use our services, e.g. who subscribe to our newsletter or request a publication from us
- Questions about your mental health and alcohol use.

This above list is not exhaustive and there may be other information which we need to collect for the purposes of carrying out our services. You can find out what personal data we have collected and hold about you by contacting us. See “Your Rights” section below.

Special Category Data

Where you are showing signs of potential crisis such as a missed payment, in order to determine whether there are extenuating circumstances (such as vulnerability) affecting your ability to meet your obligations to pay your bills we may need to review Special Category Data. In order to make this determination we may ask you for, or you may volunteer to give us, Special Category Data such as information about disability, illness or pregnancy and/or information about age, recent bereavement, family circumstances and employment status. We will only use this personal data to determine your vulnerability and we will obtain your consent to processing this data.

How your personal information is collected

We collect most of this personal information directly from you—in person, by telephone, text or email and/or via our website and apps.

We may also collect information:

- directly from a third party, eg:
 - Companies that would like us to contact you to identify potential vulnerability in order to positively discriminate.
 - credit reference agencies (when you have given consent)
- from a third party with your consent, eg your bank or building society; your medical and/or health care providers

from cookies on our website—for more information on our use of cookies, please see our cookies policy

Cookies

How and why we use your personal information

Under data protection law, we can only use your personal information if we have a proper reason for doing so, eg:

- to comply with our legal and regulatory obligations;
- for the performance of our contract with you or to take steps at your request before entering into a contract;
- for our legitimate interests or those of a third party; or
- where you have given consent.

Legitimate Interests. A legitimate interest is when we, or a third party have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

Where you are a customer of one of our clients that provides services to you we may rely on legitimate interests to collect and process information about you. This is because we have a legitimate interest in helping our clients understand if they are likely to recover payment for their services. We also have an interest in helping you manage your payment issues and communicate effectively with those service providers to which you owe money. When we process your information for legitimate interests we make sure that we consider and balance any potential impact on you (both positive and negative), and your rights under data protection laws. We will not use your personal data where our interests (or those of our clients) are overridden by the impact on you (unless we have your consent or are otherwise permitted by law).

You have the right to object to processing that is based on our legitimate interests. For more information on your rights, please see “Your Rights” section below.

Other Purposes and Reasons for Processing Personal Information

The table below provides more information about the purposes for which we use Personal Information and our reasons for doing so.

What we use your personal information for	Our reasons
To provide our services to you	To profile your level of vulnerability, in order for creditors/interested parties to positively discriminate and offer the appropriate support and inclusion in line with your vulnerability score.
To prevent and detect fraud against you or our clients that are your service providers	For our legitimate interests or those of a third party, ie to minimise fraud that could be damaging for us and for you
Conducting checks to identify you and verify your identity Other processing necessary to comply with professional, legal and regulatory obligations that apply to our business	To comply with our legal and regulatory obligations
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies	To comply with our legal and regulatory obligations
Ensuring business policies are adhered to, eg policies covering security and internet use	For our legitimate interests or those of a third party, ie to make sure we are following our own internal procedures so we can deliver the best service to you
Operational reasons, such as improving efficiency, training and quality control	For our legitimate interests or those of a third party, ie to be as efficient as we can so we can delivery the best service for you at the best price
Ensuring the confidentiality of commercially sensitive information	For our legitimate interests or those of a third party, ie to protect trade secrets and other commercially valuable information To comply with our legal and regulatory obligations
Statistical analysis to help us manage our business, eg in relation to our financial performance, customer base, product range or other efficiency measures	For our legitimate interests or those of a third party, ie to be as efficient as we can so we can delivery the best service for you in the most efficient and effective manner; for research purposes. If we plan to make these results public, for example publishing them in an academic journal, we will ask your permission for your data to be used for this first (<i>link to research consent form if applicable</i>), and any publications will not identify you by name.
Preventing unauthorised access and modifications to systems	For our legitimate interests or those of a third party, ie to prevent and detect criminal activity that could be damaging for us and for you To comply with our legal and regulatory obligations

<p>Updating and enhancing customer records</p>	<p>To provide our services to you in the most efficient way</p> <p>To comply with our legal and regulatory obligations</p> <p>For our legitimate interests or those of a third party, eg making sure that we can keep in touch with our customers about new products and services</p>
<p>Ensuring safe working practices, staff administration and assessments</p>	<p>To comply with our legal and regulatory obligations</p> <p>For our legitimate interests or those of a third party, eg to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you</p>
<p>Marketing our services to:</p> <p>—existing and former customers;</p> <p>—third parties who have previously expressed an interest in our services;</p> <p>—third parties with whom we have had no previous dealings.</p>	<p>For our legitimate interests or those of a third party, ie to promote our business to existing and former customers</p>
<p>Profiling</p>	<p>To profile your level of vulnerability, in order for creditors/interested parties to positively discriminate and offer the appropriate support and inclusion in line with your vulnerability score.</p>

The above table does not apply to Special Category Data, which we will only process with your explicit consent.

Promotional communications

We may use your personal information to send you updates (by email, text message, telephone or post) about our services, including about new services and products. Where you are a customer of ours or have shown an interest in becoming a customer or using our services, we have a legitimate interest in processing your personal information for promotional purposes (see above '**How and why we use your personal information**'). This means we do not usually need your consent to send you promotional communications. However, where consent is needed, we will ask for this consent separately and clearly.

We will always treat your personal information with the utmost respect and **never** sell or share it with other organisations outside the TellJO group for marketing purposes.

You have the right to opt out of receiving promotional communications at any time by:

- contacting us at dominic.maxwell@telljo.org
- using the 'unsubscribe' link in emails or 'STOP' number in texts

We may ask you to confirm or update your marketing preferences if you instruct us to provide further products and/or services in the future, or if there are changes in the law, regulation, or the structure of our business.

Who we share your personal information with

We routinely share personal information with:

- companies within our group
- third parties we use to help deliver our products and/or services to you, eg our technical and development partner, G33k Limited;
- We may share anonymised data with academic or regulatory bodies for research and evaluation

We only allow our service providers to handle your personal information if we are satisfied they take appropriate measures to protect your personal information. We also impose contractual obligations on service providers relating to ensure they can only use your personal information to provide services to us and to you. We may also share personal information with external auditors, eg in relation to ISO accreditation and the audit of our accounts.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share some personal information with other parties, such as potential buyers of some or all of our business or during a re-structuring. Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

We will not share your personal information with any other third party without your explicit consent.

Where your personal information is held

Information may be held at our offices and those of our group companies, clients, third party agencies, service providers, representatives and agents as described above (see above: '**Who we share your personal information with**').

Some of these third parties may be based outside the European Economic Area. For more information, including on how we safeguard your personal information when this occurs, see below: '**Transferring your personal information out of the EEA**'.

How long your personal information will be kept

We will keep your personal information while you have an account with us or we are providing services to you.

Thereafter, we will keep your personal information for as long as is necessary:

- to respond to any questions, complaints or claims made by you or on your behalf;
- to show that we treated you fairly;
- to keep records required by law;
- in order to reprofile and rescore vulnerability in order to measure social and financial resilience and measure changes in score;
- in order to offer free interventions that can support your identified vulnerability or have a positive impact in your life.

We will not retain your personal information for longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of personal information.

When it is no longer necessary to retain your personal information, we will delete or anonymise it.

Record type	Retention period
Information about a computer, including visits to and use of this website (including an IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths)	2 years following account closure
Information provided when registering with our website (including email address)	2 years following account closure
Information provided when completing a profile on our website (including a name, gender, date of birth, interests and hobbies, educational details)	2 years following account closure
Information provided for the purpose of subscribing to email notifications and/or newsletters (including a name and email address)	Indefinitely or until the client chooses to 'unsubscribe'
Information provided when using the services on the website or that is generated in the course of the use of those services (including the timing, frequency and pattern of service use)	Indefinitely
Information relating to any subscriptions made (including name, address, telephone number, email address and card details)	2 years following account closure
Information posted to our website for publication on the internet	2 years after post
Information contained in or relating to any communications sent through the website (including the communication content and metadata associated with the communication)	2 years following contact
Any other personal information chosen to be sent	2 years following contact

Transferring your personal information out of the EEA

To deliver services to you, it is sometimes necessary for us to share your personal information outside the European Economic Area (EEA), eg:

- with our offices outside the EEA;
- with your and our service providers located outside the EEA;

We use the following service provider that is based outside the EEA for technological and development services:

G33K located in Macedonia.

These transfers are subject to special rules under European and UK data protection law.

We will ensure the transfer complies with data protection law and all personal information will be secure. Our standard practice is to use standard data protection contract clauses that have been approved by the European Commission. To obtain a copy of those clauses and would like further information please contact us (see 'How to contact us' below).]

Your rights

You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your personal information (the right of access)
Rectification	The right to require us to correct any mistakes in your personal information
To be forgotten	The right to require us to delete your personal information—in certain situations
Restriction of processing	The right to require us to restrict processing of your personal information—in certain circumstances, eg if you contest the accuracy of the data
Data portability	The right to receive the personal information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
To object	The right to object: —at any time to your personal information being processed for direct marketing (including profiling); —in certain other situations to our continued processing of your personal information, eg processing carried out for the purpose of our legitimate interests.
Not to be subject to automated individual decision-making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

For further information on each of those rights, including the circumstances in which they apply, please contact us or see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals' rights under the General Data Protection Regulation](#).

If you would like to exercise any of those rights, please:

- complete a data subject request form—available on our website at http://telljo.org/TellJO_SAR.pdf or
- email, call or write to us — see below: '**How to contact us**'; and
- let us have enough information to identify you (eg your full name, address and customer account or matter reference number);
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- let us know what right you want to exercise and the information to which your request relates.

Keeping your personal information secure

We have appropriate security measures to prevent personal information from being accidentally lost, or used or accessed unlawfully. We limit access to your personal information to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

How to complain

We hope that we can resolve any query or concern you may raise about our use of your information.

The [General Data Protection Regulation](#) also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns> or telephone: 0303 123 1113.

Changes to this privacy policy

This privacy notice was published on 18th July 2018 and last updated on **2nd August 2018**.

We may change this privacy notice from time to time—when we do we will inform you via email and/or website update.

How to contact us

Please contact us and/or our Data Protection Officer by post, email or telephone if you have any questions about this privacy policy or the information we hold about you.

Our contact details are shown below:

Our contact details	Our Data Protection Officer's contact details
TellJO Ltd	Dominic Maxwell
NatwestEntrepreneur Accelerator	Natwest Entrepreneur Accelerator
149 Preston Road	149 Preston Road
Brighton, BN1 6AF	Brighton, BN1 6AF
07901 555230	07901 555230

Do you need extra help?

If you would like this notice in another format (for example audio, large print, braille) please contact us (see 'How to contact us' above).