

## NTF Financial Solutions Limited Privacy Notice



### Who we are

NTF Financial Solutions Limited ("NTF") is an Insolvency Practice licensed and regulated by the Institute of Chartered Accountants in England & Wales. NTF specialises in offering Individual Voluntary Arrangements to individuals and your security and privacy are important to us.

This Privacy Notice explains how we use the personal information we collect about you when we provide our services to you. Our lawful basis for processing is 'contractual' however we also request your consent to record or share special category data or the use of third parties.

### What personal information we collect

In order to provide our services under the contractual agreement, we collect 'Personal Information (data)' that uniquely identifies you. The table below explains the information we collect and why.

<b>The categories of your personal data we collect include:</b>	<b>Why we want the data, and what we will do with it:</b>
<b>Personal descriptors</b>  e.g. Name, age, date of birth, passport/or driving licence	We require this to identify you and communicate with you.  <b>You cannot opt out of providing this information.</b>
<b>Financial information</b>  e.g. Income, expenditure, assets, liabilities, bank statements, benefits details, wage slips, tax returns, default history, legal action or county court judgements, previous credit history, credit reference information, bank account and debit card details.	We require this to obtain and oversee an Individual Voluntary Arrangement on your behalf. This includes the regular review of your circumstances and making payments to your creditors on your behalf  <b>You cannot opt out of providing this information.</b>
<b>Employment information</b>  e.g. Employment status, Occupation, pay date, salary amount, professional occupational status (e.g. Dr., Company Director, Police officer)	We require this to provide certain services such as to assess your eligibility for debt solutions. This information is a contractual requirement for the provision of an individual voluntary arrangement  <b>You cannot opt out of providing this information.</b>
<b>Life information</b>  e.g. Marital status, number of child dependents, approximate ages of child dependents, general household details	We require this to provide certain services, such as assessing what you can afford to pay towards your debts. This information is a contractual requirement for the provision of an individual voluntary arrangement  <b>You cannot opt out of providing this information.</b>
<b>Health information</b>  e.g. Physical or mental disabilities	We may collect certain special category data to identify if you are potentially vulnerable or require further support.  <b>You can opt out of providing this information however we believe to do so may affect the level of service you may receive and the viability of your IVA.</b>

## **Where we collect personal information from**

We may receive information directly from you, any third party you appoint to act on your behalf, legal parties, your creditors, your bank, credit reference agencies or law enforcement. In some cases, we may receive other information about you, such as details of a health condition from your health professional.

## **How we use your personal information**

The main lawful basis for processing your information is for the performance of the 'contract' as we cannot carry out our contractual obligations without processing your personal information. In our performance of the contract we may also process your information for the following reasons:

- **deliver services and meet legal and regulatory responsibilities**
- **verify identity where this is required**
- **communication by post, email or telephone**
- **understand needs and how they may be met**
- **maintain records**
- **process financial transactions**
- **prevent and detect crime, fraud or corruption**

On occasions our lawful basis for processing your information may change for example, if it is necessary for your vital interests (e.g. to protect your life) or where we have a legitimate interest in processing your information (e.g. for statistical data purposes), however where possible this is usually anonymised to safeguard it.

Our main purpose for processing your personal information is to provide the services you have requested us to provide to you as specified in the terms and conditions/contract. For example; If you require a debt solution, we need to collect information to assist you with your financial difficulties. To collect special category information or process your information for certain purposes (i.e. direct marketing) we require your explicit and informed consent. Where this applies it will be made clear to you.

## **Who we share your personal information with**

Depending on the service requested we may share your information with other parties as without doing this we (or they) cannot carry out the service specified within the contractual agreement.

In addition, from time to time, we use the services of external consultants, legal specialists, or outsource certain aspects of our processes to other organisations, some of whom may be located outside of the EU (European Union). We keep outsourcing activity to a minimum however on occasion these organisations may assist us such as with quality monitoring, scanning, marketing, identity verification checks, audits, record keeping or printing. All outsourced service providers are carefully vetted and monitored to ensure the safeguarding of your information.

We may use the services of credit reference agencies for the purpose of verifying your identity this usually will leave a 'soft search' on your credit file.

For more information about this visit [www.experian.co.uk](http://www.experian.co.uk)

In accordance with our legal obligations we may be required to share information with the police, other law enforcement, government agencies or regulatory bodies.

You also have the option to appoint someone else to act on your behalf such as a spouse or carer with whom we can share your information with. You will need to provide separate explicit consent for us to be able to share your information with them, and you can revoke this consent at any time.

## **If you do not provide your personal information**

If you do not provide the information we require in able to carry out the service requested of us then we will not be able to act on your behalf

## **How long we retain your personal information for**

Depending on the service undertaken and the type of information held your personal information will be held no longer than 7 years from completion of the service. This information is held for both legal reasons and for the protection of all stakeholders.

## **Holding personal information outside the EEA**

During our normal course of business, we may utilise software to store or transfer your data which may be held on servers outside of the EEA (e.g. Microsoft Dropbox). Whilst the storage of the information is not directly under our control we believe the information is protected by the appropriate technical and organisational security measures and the countries in which it may be stored ensure an adequate level of protection for personal data

## **Using our website**

If you use our website we may collect your IP address, cookies, browser information, and use plugins that collect your information (e.g. Google Analytics, WordPress, and Yoast SEO). Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This is used to track visitor use of the website and to compile statistical reports on website activity.

For further information visit [www.aboutcookies.org](http://www.aboutcookies.org) or [ico.org.uk/concerns/cookies/](http://ico.org.uk/concerns/cookies/)

You can set your browser not to accept cookies and can find out more information in the links above, however in some cases our website features may not function as a result.

## **Your rights**

**Access to your information** – You have the right to request a copy of the personal information about you that we hold.

**Correcting your information** – We want to make sure that your personal information is accurate, complete and up to date and you may ask us to correct any personal information about you that you believe does not meet these standards.

**Deletion of your information** – You have the right to ask us to delete personal information about you where:

- You consider that we no longer require the information for the purposes for which it was obtained.
- We are using that information with your consent and you have withdrawn your consent – see *Withdrawing consent to using your information* below.
- You have validly objected to our use of your personal information – see *Objecting to how we may use your information* below.
- Our use of your personal information is contrary to law or our other legal obligations.

**Objecting to how we may use your information** – You have the right at any time to require us to stop using your personal information for direct marketing purposes. In addition, where we use your personal information to perform tasks carried out in the public interest then, if you ask us to, we will stop using that personal information unless there are overriding legitimate grounds to continue.

**Restricting how we may use your information** – In some cases, you may ask us to restrict how we use your personal information. This right might apply, for example, where we are checking the accuracy of personal information about you that we hold or assessing the validity of any objection you have made to our use of your information. The right might also apply where this is no longer a basis for using your personal information, but you don't want us to delete the data. Where this right to validly exercised, we may only use the relevant personal information with your consent, for legal claims or where there are other public interest grounds to do so.

**Automated processing** – If we use your personal information on an automated basis to make decisions which significantly affect you, you have the right to ask that the decision be reviewed by an individual

to whom you may make representations and contest the decision. This right only applies where we use your information with your consent or as part of a contractual relationship with you.

**Withdrawing consent using your information** – Where we use your personal information with your consent you may withdraw that consent at any time and we will stop using your personal information for the purpose(s) for which consent was given.

Please contact us in any of the ways set out in the *Contact information and further advice* section if you wish to exercise any of these rights.

### **Changes to our privacy statement**

We keep this privacy statement under regular review and will place any updates on our website [www.ntffs.co.uk](http://www.ntffs.co.uk). Paper copies of the privacy statement may also be obtained by contacting our office on 01625 540744 or by emailing [info@ntffs.co.uk](mailto:info@ntffs.co.uk)

This privacy statement was last updated on 24 May 2018.

### **Contact information and further advice**

The Data Manager  
NTF Financial Solutions Limited  
Suite 4 Aus-Bore House  
19-25 Manchester Road  
Wilmslow  
Cheshire  
SK9 1BQ

### **Complaints**

We seek to resolve directly all complaints about how we handle personal information but you also have the right to lodge a complaint with the Information Commissioner's Office, whose contact details are as follows:

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

Telephone - 0303 123 1113 (local rate) or 01625 545 745

Website - <https://ico.org.uk/concerns>