

Privacy Policy – Tandem

Tandem is committed to protecting your privacy. This Privacy Policy sets out the details of the information that we may collect from you and how we may use that information when you use any of our products and services, our app and our websites. Please take your time to read this Privacy Policy carefully. This Privacy Policy should be read alongside, and in addition to all product and service specific terms and conditions.

1. About us

In this Privacy Policy references to “us”, “our”, “we”, or “Tandem” are to Tandem Bank Limited and Tandem Money Limited.

Tandem Bank Limited is a company registered in England and Wales (company registration number 00955491) with its registered office address at 123 Pentonville Road, London N1 9LG. Tandem Bank Limited is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority under registration number 204479.

Tandem Money Limited is a company registered in England and Wales (company number 08628614) whose registered office is at 123 Pentonville Road, London N1 9LG. Tandem Money Limited is authorised and regulated by the Financial Conduct Authority under registration number 684908.

Tandem acts as data controller in respect of your personal information that we process.

If you have any questions about how we collect, store or use your information, please contact us on 0203 370 0970 or at dataprotection@tandem.co.uk.

2. What personal information do we collect and use and who do we collect it from?

We will collect personal information like your name, address and date of birth when you apply for, or use any of our products or services. We will also collect data from your use of our website and app. The type of information that we collect from you will depend on your relationship with us:

- Information requested from you when you make an application for one of our products or services (including, but not limited to name, postal address, telephone number, email address, date of birth) or at any time about your personal and financial circumstances or which we gather about you from the way you use and manage any account which we open for you.
- Details of any transactions (including any purchases of goods or services and other payments to and from your account) such as the amount, date and currency of a purchase and the supplier category (such as petrol station, supermarket or medical services).
- We will keep details and records of when you contact us and we contact you, like calls, emails, text messages, social media messages or other communications.
- User interactions and log data when you use our website(s) and app and click on our adverts on other websites (see information on cookies on our website)
- Mobile device specific data.
- Information we receive about you from third parties, such as credit reference or fraud protection agencies.
- Information that is publicly available.
- Information from social media sites.
- Information requested from you when you register for the Tandem app including, but not limited to external security details for your linked accounts from the sites of external providers active on the Tandem App,

- Financial details (balances and transactions) of your linked accounts from external providers active on the Tandem App.
- Information requested from you which is required to complete a switching process via the Tandem App

Please note that your external security details will be stored on a third party secure server and not on your mobile phone. Your external security details will be encrypted when stored and encrypted when data is transmitted – we will never see or have access to your external security details.

3. How do we collect your information

We collect information from you:

- when you apply for our products and services via our websites or our app
- when you talk to us on the phone, over email, by letter, via chat or social media
- when you make transactions using our products and services
- when you connect to our products and services using devices, such as computers and mobile phones, using cookies and other internet tracking software

4. What are the purposes for which your personal information is used

Data protection law says that we are allowed to use personal information only if we have a proper reason to do so. We'll process your personal data on the following legal basis and for the following purposes:

- As necessary to perform our contract with you for the relevant account, product or service:
 - To take steps at your request before entering into the contract;
 - To decide whether to enter into it, and, if you are applying for credit, the level of credit to offer you (including automated decision making relating to this);
 - To manage and perform that contract;
 - To complete a supplier switch that you have requested;
 - To keep our records up to date;
 - To trace your whereabouts to contact you about your account and recovering money that is owed to us; and
 - To analyse your balances and transactions of your linked accounts to identify opportunities to save.
- As necessary for our own legitimate interests, that is when we have a business or commercial reason to use your information, for example:
 - For good governance, accounting and managing and auditing our business operations;
 - To keep our records up to date;
 - Working out which of our products and services may be of interest to you;
 - To search at credit reference agencies if you apply for credit;
 - To monitor emails, calls other communications and activities on your account;
 - For market research, analysis and developing statistics; and
 - To send you marketing communications (including automated decision making relating to this).
- As necessary to comply with a legal obligation, for example:
 - To comply with our legal and regulatory requirements and related disclosures;
 - To establish and defend our legal rights;
 - For activities relating to the prevention, detection and investigation of crime;

- To verify your identity, make credit, fraud prevention and anti-money laundering checks;
- To monitor emails, calls and other communications and activities on your account.
- Based on your consent, for example:
 - When we process any special categories of personal data about you at your request (e.g. information concerning your health);
 - To send you marketing communications where we've asked for your consent to do so.

You're free to withdraw your consent at any time, however this will mean that we will not be able to do certain things for you.

5. How will your personal information be used?

We will use the personal information we hold about you, and data from the technology/devices you use to access your account(s) to:

- Provide, manage and develop our products and services
- Understand your preferences and advise you about our other products and services
- Undertake market research, transactional analysis, statistical analysis and system testing
- Update our records
- Recover debt
- Confirm your location
- Assess whether you can afford the credit you've applied for
- Prevent and investigate fraud, money laundering and other crimes

If we believe that you have tax obligations in another country, we may disclose personal information of yours with those tax authorities, or with HM Revenue and Customs, who may share the information with the other tax authorities.

We may search, use and share the records held by domestic and international credit reference agencies and fraud prevention agencies, as well as our own internal records to:

- Confirm your identity and prevent fraud or money laundering
- Check your credit history and income details for affordability
- Check details on applications for credit and credit related to other facilities

Credit checking

Credit reference agencies keep a record of all searches, including those used to confirm your identity. Credit reference agencies also keep a record of whether or not your application is successful and whether you've missed any payments. Missing payments can negatively impact your credit rating so it's best to call us on 0203 370 0970 before you do – we may be able to help you sort something out.

We'll inform the credit reference agency if you miss or are late on any payments. The agency may then make your personal information available to other organisations so that they can make a decision about you or a joint account holder you may have an account with.

For joint applications, we'll collaborate with our credit reference agencies to carry out joint searches. This will create a financial link between the applicants, which will be taken into consideration during any future searches on you or the other applicant. The financial link can only be removed successfully if you file for a 'disassociation' with the credit rating agency.

We will make decisions to offer you credit and the level of credit to offer you based on automated processing, including profiling. If you do not agree with the automated decision you have the right to ask us to review the decision. If you want to understand more about a credit decision or to have a credit decision reviewed please call us on 0203 370 0970.

For more information on how credit reference agencies work and to see their information notices please click on the links below:

[Experian](#)

[Exquifax](#)

[Callcredit](#)

6. Who do we share your information with?

We disclose your information to the third parties listed below for the purposes described in this Privacy Policy. You can contact us for details of specific disclosures made in respect of your information:

- Third parties acting on our behalf, including our service providers and agents who help us manage your products and services, for example our payment, aggregation and switching partners;
- Credit referencing agencies to check your credit rating;
- Relevant government bodies, authorities and regulatory bodies in order to comply with our regulatory and reporting obligations;
- IT providers/hosted IT solution providers to enable us to provide our products and services to you;
- Debt collection agencies in the event we need to collect arrears from you;
- Other service providers via a shared, secured database for income verification and affordability checks and to manage/collect arrears;
- Our professional advisors (lawyers, accountants and consultants);
- Any other parties connected with your account e.g. guarantors and joint account holders;
- Market research companies to assist us in improving our product or service delivery;
- Any third party who is restructuring, selling or acquiring our assets, as long as that party uses the personal information in accordance with the terms of any agreements between you and us;
- If you have cards linked to your account, we'll share transaction details with MasterCard, who provide our cards. They may transfer this information overseas to deal with transactions, resolve disputes and/or for statistical purposes.
- Anyone else where we have your consent or where it is required by law.

We will make sure that anyone acting on our behalf only uses your personal information in line with our instructions and that they keep the data safe.

We won't share or give your personal information to external companies for their own marketing purposes.

7. What marketing activities do we carry out?

We may also use your personal information to provide you with information about products or services which may be of interest to you where you have provided your consent for us to do so.

We are committed to only sending you marketing communications that you have clearly expressed an interest in receiving. If you wish to unsubscribe from emails sent by us, you may do so at any time by clicking on the “unsubscribe” link that appears in all emails. Otherwise you can always contact us at dataprotection@tandem.co.uk or on 0203 370 0970 to update your contact preferences.

8. Data anonymisation and aggregation

Your personal data may be converted into statistical or aggregated data which cannot be used to identify you, then used to produce statistical research and reports. This aggregated data may be shared and used in all the ways described above.

9. How long do we keep personal information for?

We only keep personal information for as long as reasonably necessary to fulfil the relevant purposes described in this Privacy Policy and in order to comply with our legal and regulatory obligations.

After you stop being a customer, we may keep your data for up to 7 years for one of these reasons:

- To maintain records according to laws and regulations that apply to us
- To show that we treated you fairly
- To respond to any questions or complaints

We may keep your data for longer than 7 years if we cannot delete it for legal, regulatory or technical reasons.

10. What is our approach to international data transfers

Some of our suppliers who process your data in accordance with this Privacy Policy may be outside the UK and the European Economic Area (“EEA”). When they do, we will have a contract in place to make sure the recipient protects the data to the same standard as is required in the EEA.

11. Your rights under applicable data protection law

You have certain rights under applicable data protection law, these rights are:

- The **right to be informed** about our processing of your personal data
- The **right to request access** to your personal data and information about how we process it
- The right to have your personal data corrected if it is inaccurate and to have incomplete personal data completed (the “**right to rectification**”)
- The right to have your personal data deleted (the “**right to be forgotten**”)
- The **right to restrict processing** of your personal data
- The right to move, copy or transfer your personal data (“**data portability**”)
- The **right to object** to the processing of your personal data
- Rights in relation to **automated decision making including profiling**

You can find out more information about your rights at the Information Commissioner’s website: www.ico.org.uk

If you choose not to give us the personal information that we request either during an application process or during the life of an account or product, it may delay or prevent us from meeting our obligations. It may also mean that we cannot perform the services needed to manage your accounts/provide your chosen products and services. It could mean that we have to cancel a product or service you have with us.

Please let us know if you are unhappy with how we have used your personal information. You can contact us at dataprotection@tandem.co.uk or on 0203 370 0970. You also have the right to complain to the Information Commissioner's Office who can investigate our compliance with data protection law. Find out how at www.ico.org.uk. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

12. Keeping your information up to date

We will use reasonable endeavours to ensure that your personal information is accurate. In order to assist us with this, please notify us of any changes to the personal information that you have provided to us by updating your details on the Tandem App or by contacting us at dataprotection@tandem.co.uk or calling us on 0203 370 0970.

13. Further information

We are required to employ adequate technical and organisational security measures to protect your personal information from any loss, destruction, damage or unlawful disclosure. However, please remember that no transmission over the Tandem App or the Tandem Website can ever be guaranteed as secure. Consequently, please note that we cannot guarantee the security of any personal information (including external security details) which you transfer via the Tandem App or the Tandem Websites.

14. Updates to this Privacy Policy

We may update this Privacy Policy from time to time to ensure that it remains accurate. Please check back each time you provide additional personal information to us.

This Privacy Policy was last updated on: 31 October 2018