

PRIVACY POLICY

This page sets out our Privacy Policy. This Privacy Policy covers both the use of our websites (<https://allegiant.co.uk> & <https://allegiantportal.co.uk>) and the performance of our claims management services. We respect your privacy and are fully committed to protecting your personal data. This Privacy Policy aims to give you information on how we collect and process your personal data.

Our Policy

1. Who we are

Allegiant Finance Services Limited, a private limited company registered in England & Wales registration No. 07474972. Allegiant Finance Services is an independent Claims Management Company. We do not operate as part of a group structure and our directors and shareholders have no interest or shareholding in other companies. Our registered address is 400 Chadwick House, Warrington Road, Birchwood Park, Warrington Cheshire WA3 6AE, which is also our principal place of business. We are authorised and regulated by the Financial Conduct Authority and our Firm Reference Number is 836810. We are registered with the Information Commissioners' Office under reference Z2569335. Our VAT registration is 274837662. We are the Data Controller for the purposes of GDPR.

2. Collection of personal data

2.1 Types of data collected

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes your present and former addresses, email address and telephone numbers.
- **Financial Data** includes bank account details including transactions, incoming and outgoings and payment card details, credit reports and details of judgments or financial arrangements (for example IVAs, bankruptcy or DRO).
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us or third parties.
- **Technical Data** includes internet protocol (IP) address, login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, claim registrations, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature.

However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.

We do not require any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences. However, as part of the performance of our service, we do ask you to tell us about the impact of financial mis-selling and circumstances surrounding it. In those circumstances, should you provide us with information which does fall into a Special Category, such as health information, by virtue of providing the information, you agree that you are providing your explicit consent to the processing of that personal data. We will only use Special Categories of personal data for the purposes of establishing your claim. If you do not consent to the processing of Special Category data, you must not provide it to us.

2.2 Methods of data collection

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you
 - apply to use our services;
 - subscribe to our service or publications;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey; or
 - give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our Cookies Declaration for further details.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public source as set out below:
 - Technical Data from the following parties
 - analytics providers such as Google based both within and outside the EU;
 - advertising networks such as Adroll, Taboola or Outbrain based both within and outside the EU; and
 - search information providers such as Facebook, Google and Bing based both within and outside the EU.
 - Contact, Financial and Transaction Data from providers of technical, payment and delivery services.
 - Identity and Contact Data from data brokers, aggregators and tracing services.
 - Identity and Contact Data from publicly available sources such as HM Courts & Tribunals Service, Companies House, the Registry Trust and the Electoral Register based inside the EU.

3. Use of your personal data

Purpose of using your data and relevant lawful bases

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to incept or perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

The lawful bases of processing permitted in law are:

Legitimate Interest – this means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

Performance of Contract – this means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Compliance with a legal or regulatory obligation – this means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email, post or text message. You have the right to withdraw consent to marketing at any time by contacting us.

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new lead or customer	(a) Identity (b) Contact	Performance of a contract with you
To learn about the circumstances surrounding potential claim	(a) Identity (b) Contact	(a) Performance of a contract with you

	<p>(c) Financial</p> <p>(d) Transaction</p> <p>(e) Marketing and Communications</p>	<p>(b) Necessary for our legitimate interests (to recover debts due to us)</p> <p>Where this includes a Special Category of personal data which you volunteer to us:</p> <p>(c) Explicit consent (Article 9(2)(a))</p> <p>(d) Necessary to establish a claim (Article 9(2)(f)).</p>
<p>To process and deliver our claims management services including:</p> <p>(a) Manage payments, fees and charges</p> <p>(b) Disseminate and share information with third parties such as lenders, brokers, the Financial Ombudsman, H where necessary to progress your claim</p> <p>(c) Collect and recover money owed to us</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Financial.</p> <p>(d) Transaction</p> <p>(e) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to recover debts due to us)</p>
<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) Asking you to leave a review or take a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</p>
<p>To enable you to partake in a prize draw, competition or complete a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</p>

<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity (b) Contact (c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical</p>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<p>(a) Technical (b) Usage</p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you</p>	<p>(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile</p>	<p>Necessary for our legitimate interests (to develop our products/services and grow our business)</p>

We may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you prior to that further use and we will explain the legal basis which allows us to do so and your data protection rights.

We may process your personal data without your knowledge or consent, in compliance with the above rules where required by law.

Our use of Automated Decision Making (ADM) technology

To be able to provide our high cost, financial mis-selling services, we perform automated checks to (a) identify a pattern of financial dependency on payday loan or short-term credit products; (b) whether your claim is commercially viable to us. To do this, we ask preliminary questions about your frequency and extent of borrowing from each lender. We deploy ADM to provide an instant response on the availability or otherwise of our service to you based on whether or not you meet our minimum threshold. Our website ADM process considers personal data (limited to that which you provide to us via our Application Form) and other factors relating to your lender when arriving at a decision.

Purpose/Activity of ADM	Type of data considered in our ADM process	Lawful basis for processing including basis of legitimate interest
<p>We will use your personal data to consider whether the culmination of your lending history with a specific lender brings you within our eligibility criteria. To do this, we will multiply the number of times you borrowed from a specific lender against the amount typically borrowed to calculate a estimated spend with a lender and to determine whether it meets our threshold.</p>	<p>(a) Transactional (b) Financial</p>	<p>(a) performance of a contract with you (b) Necessary for our legitimate interests (to deliver instant eligibility decisions to you and provide our services efficiently) (c) Your explicit consent.</p>

We will always ask for your consent when deploying ADM. Further information surrounding your legal rights and how to exercise them are contained in Sections 7 and 8 of this policy.

3.2 How Third Party Data Processors Use Your Data

In our capacity as Data Controller, we may have to share your personal data with third parties for the purposes set out in the table above. Where this occurs, these third parties are known as Data Processors.

- Data Processors we may share your personal data with:
- Software service providers acting as processor based in the United Kingdom, Italy, India and the US who provide software (including Software as a Service (SAAS)).
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors, accountants, bookkeepers and insurers based in the United Kingdom, the Ukraine, Sri Lanka and Pakistan who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy Policy.

We require all Data Processors to respect the security of your personal data and to treat it in accordance with the law. We do not allow our Data Processors to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

4. Options to control use of your personal data

4.1 Opting out of our marketing

We provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us only if:

- you have requested information from us or signed up to our services from us; and
- you have not later opted out of receiving that marketing.

We use post, email and SMS forms of direct marketing to opt in customers. You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by Contacting Us at any time and by indicating whether you wish to opt out certain methods of direct marketing or all.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided for the purposes of us providing claims management services under contract with you.

4.2 Website Cookies

Cookies are usually small files stored on your computer's browser directory or program data subfolders. They collect information whilst you browse.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. You can learn more at www.allaboutcookies.org. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use and to control your settings, please see our [Cookies Declaration](#).

4.3 Google Analytics

We use Google Analytics to review our website performance. You can opt out of Google analytics by visiting Google's opt out page at <https://tools.google.com/dlpage/gaoptout>

5. Failure to provide us with personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to provide you with our claims management services. In this case, we may have to cancel our service and will notify you accordingly.

6. Data security and retention

6.1 How we keep your data secure

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We do not publish details of these arrangements, as it could undermine our security measures.

In addition, to the extent possible, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

6.2 International transfer of personal data

As is common with many businesses, we use Data Processors based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see [European Commission: Adequacy of the protection of personal data in non-EU countries](#).
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For

further details, see [European Commission: Model contracts for the transfer of personal data to third countries](#).

- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see [European Commission: EU-US Privacy Shield](#).

Please [contact us](#) if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

6.3 Our Data Retention Policy

By law and under the Financial Conduct Authority's rules, we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for a reasonable period. This extends to keeping recordings of all inbound and outbound calls and copies of electronic communications such as emails or SMS.

We have determined a reasonable retention period to be 6 years after a customer ceases a contractual relationship with us. We believe this is an appropriate period to preserve evidence for tax, regulatory and legal purposes and with one eye on appropriate limitation periods relevant and the necessity to preserve evidence to aid scrutiny.

In some circumstances you can request erasure of your data, as explained in Sections 7 and 8.

Please note, we may at our discretion anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes. Where this occurs, we may use this information indefinitely without further notice to you.

7. Your legal rights explained

7.1 Your core legal rights under GDPR

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

7.2 Other legal rights under GDPR applicable to our service

Object to Automated Decision Making (ADM). Where you do this, we will undertake a human review of your application based on the same eligibility criteria deployed by the ADM process in addition to any other lawful considerations we must take into account. To apply without the use of ADM, please contact us detailing your preferred contact details. We shall make appropriate arrangements to collect your relevant information and to perform a human assessment.

Request a Review of an ADM decision. You have a right for us to conduct a human review of the accuracy of the decision arrived at by our ADM process.

8. Exercising your legal rights

To opt out of automated decision making for future submissions, enter your email address below: [zoho_consent]

To exercise other rights set out in section 7, please contact us.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Otherwise, we try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

9. Making a data privacy complaint

We would appreciate the chance to deal with your concerns before you approach the ICO so please [contact us](#) using one of the following methods.

Ultimately however, you have the right to make a complaint relating to your personal data at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk).

For complaints related to our claims management services, please see [Complaints Resolution](#).

10. Contact us

Email: helpdesk@allegiant-finance.co.uk

Telephone: 0345 544 1563

Post: Allegiant Finance Services, 400 Chadwick House, Warrington Road, Birchwood Park,
Warrington Cheshire WA3 6AE.

11. Version information

Version 2.1 effective 15 December 2019. Please [contact us](#) for historic versions.