



PRIVACY POLICY

About us & our Privacy Policy

This Privacy Policy applies to personal information collected and processed by **118 118 Money**, which is the trading name of **Madison CF UK Limited** (Company No: 08393840). Our registered office is at *71-73 Carter Lane, London, EC4 5EQ* and we are authorised and regulated by the **Financial Conduct Authority (FRN741774)**. We are part of the **kbg Group** of companies, which includes 118 118 and Conduit Global.

You can confirm our registration on the Financial Conduct Authority's website www.fca.org.uk or by contacting the Financial Conduct Authority on 0800 111 6768.

This Privacy Policy covers the collection and use of personal information through:

- Our websites www.118118money.com and www.118m8.com;
- Our 118 118 Money and 118M8 mobile applications; and
- Any related online services, digital forms, in-app chat or communication tools provided by us.

It explains how we collect, use and share your information when you interact with us through these digital channels.

For ease, we refer to these collectively as “our services” or “we/us” throughout this Privacy Policy.

Where we process personal data under secure data-sharing frameworks or government-approved data access arrangements (for example, under the Data Use and Access Act 2025 (DUAA)), those activities are also covered by this Privacy Policy.

If you wish to contact our Data Protection Officer, please contact them via dpo@118118money.com. Other ways to get in touch with us are set out in the **Contacting us** section below.

Protecting your personal information

Your personal information is protected by law. This includes the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, as well as the Privacy and Electronic Communications Regulations (PECR).

From 2025, the Data Use and Access Act 2025 (DUAA) also applies to certain types of data use and data sharing, particularly within the UK financial services sector. The DUAA promotes secure, fair, and transparent data access between regulated firms, data service providers, and government-approved data intermediaries, while maintaining strong protections for individuals' privacy and data rights.

We will continue to update this Policy to reflect:

- Any changes in how we collect, use, or share your personal data
- New relationships we form with third parties, and
- Updates required by law, regulation, or government guidance (including under the UK GDPR, DUAA, PECR and the Data Protection Act 2018).

These laws regulate how we may process personal information relating to you and grant you various rights over your data.

The aim of this Policy is to tell you how we collect, use and retain your personal information you to provide to us – and how we protect it under these laws.

Your 118M8 and 118 118 Money Accounts

118M8 is part of the 118 118 Money digital service. When you sign up or log in, we use the details you provide to create or connect your 118 118 Money and 118M8 accounts. This means you'll have one secure login to manage your 118 118 Money products and services in one place.

We use your personal data in this way because it's necessary for us to deliver the services you've requested under your agreement with us (UK GDPR Article 6(1)(b)). Since 118M8 and 118 118 Money operate as one connected service, the accounts can't be unlinked. If you no longer wish to use our services, you can close your account or ask us to delete your information at any time.

How we communicate with you

The 118M8 app is part of the 118 118 Money connected proposition. After you have registered for our services (including a free account but not a guest account), to help us deliver and maintain this service, 118 118 Money uses your contact details and app activity to send you information, updates, and insights which will include those about 118 118 Money's own credit cards, loans, and related financial products.

Certain 118M8 features are designed to work only when you hold a 118 118 Money credit card or loan. If you do not yet have one, you will still be able to access core tools and insights, but some connected features - such as spending analysis, rewards, and personalised financial insights - are available only once your 118 118 Money credit product is linked to your 118M8 account.

Because these features depend on having a 118 118 Money credit product, we'll contact you with information about products and features if they become available to you, so you can access and benefit from the full 118 118 Money proposition.

We may tailor messages to reflect your existing products and app usage, ensuring the information you receive is relevant and supports your financial management.

You can manage how we contact you (for example, email, SMS, or in-app messages) in the app settings or by contacting us at any time. You will continue to receive essential updates about your account and the 118 118 Money proposition features as they become available to you.

What the law says

Under data protection law, we can only use your personal information if we have a lawful reason to do so. We must have one or more of the following lawful reasons:

- We have your consent;
- We are entering into or are performing a contract with you;

- It is in our legitimate interests;
- When we are under a legal duty.

When we rely on our **legitimate interests** we mean our:

- Pursuit of our commercial activities and objectives, or those of a third party;
- Compliance with applicable legal and regulatory obligations or reporting and any codes of conduct;
- Improvement and development of our business operations and service offering, or those of a third party; or
- Protection of our business, shareholders, employees and customers, or those of a third party.

From 2025, the Data Use and Access Act 2025 (DUAA) also applies to certain types of data sharing and access within the financial services sector. This means that in some circumstances we may receive or share data through secure, government-approved data access frameworks – for example, when the law allows data to be shared for fraud prevention, credit risk, or regulatory purposes, including financial reporting to the regulator (FCA).

Where this happens, we will only do so in line with the DUAA's safeguards and the lawful bases set out above under the UK GDPR and Data Protection Act 2018.

What is personal information?

Personal information is information about you and other individuals. It is information which identifies you such as your name, date of birth, address and email address.

Before providing us with personal information about someone else (such as the name and email address of an additional cardholder), please tell that individual about this Privacy Policy and ask for their permission to share their personal information with us. We will ask for evidence that the individual has provided you with authorisation for us to communicate with you about their account.

Who is responsible for the personal information we collect?

Madison CF UK Limited (which trades as 118 118 Money) is the data **controller** for the purposes of the UK GDPR. This is because we dictate the purpose for which your personal information is used and any personal information you give us about other individuals.

How we collect and use your personal information

You do not have to give us any personal information in order to use most of our websites (www.118118money.com and www.118m8.com) and limited features of the 118M8 mobile application. You will need an account to use our 118 118 Money mobile application.

In some circumstances we may need to collect your personal information for example, by law or to perform a contract with you. If you decide not to give us your personal information, we may not be able to fulfil our obligations. It may also prevent us from providing you with our products and services and it may mean that we need to cancel your products and services with us.

If you are 18 or over and you wish to apply for one of our product(s), then we will need to collect certain information from you. References to **You** in this Policy mean you as the account holder, plus any additional cardholder that you request to be added to your account (if you hold a credit card account with us).

If you are a 118 118 Money credit card customer, we will make your transactional history available for categorisation and analysis in the 118M8 app. We have set out our reasons for using your personal information in the table below under the heading **Legal Basis**. Where we rely on our legitimate interests, we have set out those interests in the table below.

You have the right to object to our use of your personal information at any time. A summary of your right to object and details of who to contact if you want to exercise this right can be found at the **Contacting us** section below.

For further information on your rights please see the **Your Rights** section below.

Purpose	Legal Basis
<p>To communicate with you and other individuals</p> <ul style="list-style-type: none"> • In applications, emails, SMS and letters, meetings and telephone calls (which we may record and/or monitor for quality checks and staff training); • Please note that these recordings may also be used to help us combat fraud, when registering for our products and services, in customer surveys (and following your response to our surveys), when you participate in competitions and promotions, through our Group company websites, and during financial reviews and interviews; • To tell you about other products or services we can offer you; • Administer offers, competitions, rewards and promotions. 	<p>Consent, performance of a contract we have with you and legitimate interests: we require your personal information in order for you to apply for and receive our products and services.</p>
<p>To make decisions about your application We will:</p> <ul style="list-style-type: none"> • Verify your identity (and the identity of any additional cardholder you request) when you apply for or access our products and services. We may ask you to provide physical forms of identification when you apply for a product or service with us; • Check your eligibility when you apply for our products or services; • Check and analyse your income and spending habits – our checks may also include checking anyone who is financially linked to you; • Process your application (or to make counter offers or proposals) and provide services in relation to this website, including allowing you to monitor your account and repayments. <p>We use third parties such as TakTile and Synectics Solutions provide us with decisioning and fraudulent application, the result of our sharing your data with these third parties will determine our decision of whether to accept or decline your application based on our lending categorisation.</p>	<p>Legitimate interests: we require your personal information in order to enable us to assess and process your application for our products and services and to determine the likelihood that your data is not being used fraudulently.</p>
<p>To enhance your experience in our 118 118 Money and 118M8 proposition</p> <ul style="list-style-type: none"> • We use data about how you use our apps and services — together with any connected information or accounts — to understand what features are most useful, to tailor your in-app experience, and to provide timely and relevant offers that may benefit you. • This may include profiling based on your behaviour in the app (for example, how often you log in, what tools you use, or how you interact with insights) and on data connected to your account (for example, transaction insights or budgeting trends). We do this to help ensure the content you see is meaningful, useful and aligned to your financial needs. <p>Where our personalised recommendations amount to direct marketing, we will only send these in compliance with PECR and your marketing preferences. You can control these preferences at any time and will be provided an opt-out at each message.</p>	<p>Legitimate interests: We rely on our legitimate interest to improve and personalise how our services work, and to offer products or features that are relevant to your financial situation. We assess these interests carefully to ensure they do not override your rights and freedoms, and you can object to this type of processing at any time within the app or by contacting us.</p>

Purpose	Legal Basis
<p>To assist in the ongoing administration of your products and services in accordance with our terms and conditions which if entered into, will be a contract between us</p> <ul style="list-style-type: none"> • General account handling and service-based communications, such as statements of account those required by regulatory obligations; • Tell you about important changes or developments to the features and operation of your products and services; • Undertake financial reviews; • Trace your whereabouts and recover any debt you owe either by 118 118 Money or its debt collection representatives which may be third parties 	<p>Performance of a contract we have with you.</p>
<p>For audit and statistical purposes For example, the amount frequency, location, origin, and recipient of your payments and other transactions, and your use of our products and services.</p> <ul style="list-style-type: none"> • Gather management information to form statistical, modelling and trend analysis with the aim of developing and improving our products and services. 	<p>Legitimate interests: we require your personal information in order to enable us to assess and process your application for our products and services and to also help us refine any products and services that we may offer in the future.</p>
<p>For assessment of affordability and debt recovery purposes We will use information we receive from you and our business partners, and from other organisations such as Credit Reference Agencies (CRAs).Should you inform us of financial difficulties, we may provide you with a link to our partner, Inicio, whereby you can enter your income and expenditure details for us to assess how we can help you further. Once we have received this information, we may contact you for further discussions.</p> <p>We may review your debt as part of our overall collections strategy and share your information with a third party to which we sell or plan to sell your debt.</p>	<p>Legitimate interests: we require your personal information to enable us to process your application, provide you with our products and services and to manage our debt recovery processes.</p>
<p>To comply with legal and regulatory obligations and/or reporting, as well as legitimate interests, for example fraud prevention</p> <p>We will:</p> <ul style="list-style-type: none"> • Administer, update, consolidate, improve and manage the accuracy of our records and our business including but not limited to meeting legal, regulatory and compliance requirements and operating rules (such as anti-money laundering, regulatory reporting requirements and record maintenance). • Monitor and analyse the use of any account to detect, prevent, investigate, prosecute and/or report fraud, terrorism, misrepresentation, security incidents or crime. <p>We will also use information we receive from fraud prevention agencies.</p>	<p>Necessary for compliance with a legal obligation to which we are subject.</p>
<p>Any information we can gather on any publicly available social media websites including Facebook, TikTok, Instagram, X (formerly Twitter) and LinkedIn.</p> <p>We use this information to help manage your account by reviewing your spending habits. We also use it to help collect and recover any money that you may owe to us and to prevent fraud.</p>	<p>Performance of a contract we have with you and legitimate interests.</p>
<p>To investigate and respond to any complaints, feedback and queries</p>	<p>Legitimate interests: to enable us to deal with any issues you may have in relation to our products and services.</p>

Purpose	Legal Basis
<p>If you download our mobile application(s) or use our websites, we may collect information about your use of them including, where available:</p> <ul style="list-style-type: none"> • your IP address, IP address location (city and country) and Internet Service Provider (ISP); • operating system and browser type and version; • the type of device(s) you use • your email address <p>We use this information for system administration, fraud prevention and product development.</p> <p>In the case of fraud prevention, the above information is shared with TransUnion and we may receive an assessment determining if the device you have applied for our services from, or use of your email address, and whether this information has previously been used for fraudulent activity, the result of this may affect our decision of whether to accept or decline your application.</p>	<p>Performance of a contract we have with you and our legitimate interests: to enable you to receive our products and services in certain formats.</p>
<p>When you login to your online account or access your account via our mobile application, we will use the mobile phone number, and where requested, the email address, you have provided to send you a one-time passcode to act as an additional verification during the login process.</p>	<p>Use for secure authentication of your login details to protect you from fraud</p>
<p>If we discover that your personal details are out of date – whether through communication with you, our own checks, or information received securely from a trusted third party – we will update our records to make sure they remain accurate and up to date.</p> <p>We do this to meet our obligations under the Data Protection Act 2018 and the UK GDPR, which require personal data to be accurate and, where necessary, kept up to date.</p> <p>Where your information is also shared or accessed under secure data-sharing arrangements approved by the Data Use and Access Act 2025 (DUAA) — for example, between regulated financial services firms or through accredited data intermediaries — we will take reasonable steps to ensure those updates are reflected consistently, in line with the DUAA's data quality and accountability standards.</p>	<p>To comply with the fourth Data Protection Principle under the Data Protection Act 2018 and UK GDPR (Article 5(1)(d)) – for personal data to be accurate and kept up to date</p>

Your personal information will be held securely so that we and any other companies in our Group that you have dealings with, either now or in the future, can manage your relationship with us. This will include information you provide when you apply to us, and any additional information provided by you or others.

Payment Services Directive 2 (PSD2) and your data (applies to 118 118 Money)

The Payment Services Directive 2 (PSD2) is a regulation which has been introduced to help protect you from online fraud. You may have had communications already from other suppliers or heard of it being referred to as Strong Customer Authentication or SCA.

This regulation means we'll take additional steps to verify your identity when you log in to your online account to manage your loan or credit card, rather than just asking for your password or fingerprint.

Every time you log in to your 118 118 Money online account, we will send you a one-time passcode and you will need to enter this to complete your log in. If you use our app to manage your account, you won't have to do this every time you log in but we will be asking you to verify your identity every so often.

The passcode is sent to the mobile phone number you have registered with us as a text message. Please ensure that your mobile phone details are up-to-date and should you need to change them, please contact our Customer Assistance team on 02920 548118 or via the 118 118 Money mobile app.

What is Eligibility Check? (applies to 118 118 Money)

Eligibility Check is an online service we offer which will tell you if you might be eligible for one of our products and services (such as a loan or a credit card) without it affecting your credit rating.

If you wish to use Eligibility Check you will be asked to submit certain personal information to us — please see the **Using credit reference agencies (CRAs)** section below for further details of the information you will be asked to provide.

Eligibility Check allows us to check your credit record (you'll be able to see our search on your credit file, but other organisations won't be able to see it which means that it will not impact your credit rating). We will use our search, together with the information you have provided to tell you if we're likely to accept you for our products and services, solely on a credit basis using our own credit scoring methods.

Following the Eligibility Check, we'll tell you if you're likely to be accepted by us for our products and services, but this is not an offer of credit.

If, following the Eligibility Check, you decide to complete your application for our products and services we will run further checks (including a credit check which other organisations will be able to see on your credit file) and, if:

- we find certain information on fraud prevention databases or we can't verify your identity or other information you've given us; or
- based on the information you've given us we don't believe that the product or service is affordable or sustainable for you,

we will not be able to offer you the product or service.

As we are a finance broker (as well as being a lender), if we are not able to offer you one of our products or services, we may pass your information to our lending partners Aspire Money Limited (Aspire). Aspire Money is a consumer credit lending platform who may use your information to assist you in finding an alternative appropriate product which meets your needs by sharing your application data with other providers.

To enable us to legitimately pass your application information (including personal data you have provided) to one of our lending partners, we will request your consent and this consent will be recorded for audit purposes.

Once your data has been passed to one of our lending partners, you will retain a relationship with both 118 118 Money and the lending partner in line with the terms as stated in the respective privacy policies.

For further information on Aspire, please visit www.aspiremoney.co.uk.

Additional credit searches during system testing (118 118 Money)

When you apply for a product with us, we may carry out a credit check using credit reference agencies. This usually involves a "soft search", which is visible to you on your credit file but does not affect your credit score.

As part of improving our systems, we may temporarily run more than one credit assessment at the same time to ensure our new systems are working correctly. During this period, you may see more than one soft search from us on your credit file.

These additional searches:

- are only "soft searches"
- do not affect your credit score or lending decisions by other lenders
- are used solely for testing and validation of our systems

Even if multiple searches are recorded, they will not impact your ability to obtain credit. We will only carry out searches where necessary and in line with our data protection obligations.

Who do we share your personal information with?

Our Group companies

We may share your personal information with any member of our Group, which means our subsidiaries, our ultimate holding company and its subsidiaries. This enables us, and other companies within our Group, to better understand your needs and run your accounts in the efficient way that you expect. We will always treat your personal information as private and confidential.

Fraud prevention agencies (applies to 118 118 Money)

We will also need to confirm your identity before we can provide you with our products and services and will need to share your personal information to help detect fraud and money laundering risks. We use fraud prevention agencies to help us with this.

Should fraud or money laundering be suspected, we will pass your personal information to a law enforcement agency so that they can investigate, prosecute and prevent financial crime. A fraud prevention agency may also share your personal information with a law enforcement agency.

Online banking and you providing us with bank statements (applies to 118 118 Money)

As part of our checks in respect of your application for one of our products and services, we may also ask you to supply your bank statements in order to verify your identity and/or to verify details of your income and expenditure.

If we ask you for your bank statements, we will tell you how to supply these securely to us directly or we may offer you the option to supply them to us using **MOGObankconnect** (which is a free of charge service offered by **TransUnion** (a CRA) which enables us to see the transactions on your bank account securely).

For more information on this service, please see www.TransUnion.co.uk/consumer-solutions/mogo-bank-connect.

We also partner with Credit Kudos Limited, who provide open banking services. This means that during the application process we may direct you to Credit Kudos for you to link your online banking account with your application. This delivers to us the information held within your bank statements and the ability to use these within our decision process for the application.

You are in complete control of this service and may rescind permission at any time, we will store the information provided by Credit Kudos as per the retention tables in this Policy. Credit Kudos's Privacy Policy can be found at <https://www.creditkudos.com/legal/privacy>

118 118 Money's Use of Open Banking Services (applies to 118 118 Money & 118M8)

What is Open Banking?

Open Banking is an initiative led by the UK's Competition and Markets Authority (CMA) to facilitate innovation, competition and collaboration between banks, financial technology and online service providers through the creation of new products and services for customers using Application Programming Interfaces (APIs).

118 118 Money and Open Banking

118 118 Money provides you with a payment facility in the form of a credit card and is therefore defined as Account Servicing Payment Service Provider within Open Banking. This means that you may provide your consent to FCA regulated third party providers, so that your 118 118 Money related financial information is shared in a controlled and secure manner.

If you choose to share information, you will be automatically asked to refresh your consent every 90 days to ensure that you continue to understand and consent to the information being shared. At any point you can remove your consent instantly through your online account with 118 118 Money, or through the third-party provider's software.

Data that may be shared via Open Banking, with your consent, could include the following: -

- Account name
- Account number
- Balance
- Incoming transactions
- Outgoing transactions
- Detailed statement view
- Product details
- Offers available to you

Please be aware that if we share your data, with your consent, you will also be able to review this data within your chosen third-party Open Banking provider.

If you are accepted based on your open banking data, and have consented to marketing, we may use insights derived from that open banking data to offer you new products or services.

This use of open banking data for marketing purposes is separate from, and in addition to, your consent to share open banking data for application and affordability assessment. You can withdraw your marketing consent at any time.

118 118 Money and Money Dashboard (D•One) Open Banking (applies to 118 118 Money)

During your application process, we may need further information to help us assess your suitability to our credit card or loan products, and which one is right for you.

To help us with this, we have partnered with D•One to provide us with information relating to validating your income and the categorisation of your spending habits. This will only occur if you provide consent, after reading D One's privacy information, and connect your bank account. D•One will manage your personal data and send this back to 118 118 Money to aid our decisioning.

We are permitted to only use the categorised information for the purpose of assessing your eligibility or processing your application. We may share the categorised information with a third party to help us perform internal analytics to assess the information provided.

Once the information is received, your application will be reviewed and you or may not be approved for lending.

118M8 and Money Dashboard (D•One) Open Banking (applies to 118M8)

From March 2026, it is possible for you to connect your open banking data to your 118M8 account; to help us with this, we have partnered with D•One to provide us with information relating to the categorisation of your spending habits. This will only occur if you provide consent, after reading D One's privacy information, and connect your bank account. D•One will manage your personal data and send this back to the 118M8 app for us to present it to you in easy-to-read categories, along with your daily balances. This connection will remain active until you withdraw consent by contacting D•One.

The data provided via D•One will enable you to access additional features which will help you understand your spending and credit trends and your overall financial fitness journey,

If you'd like to read more about Open Banking, please visit [What is open banking? - Open Banking](#).

Using credit reference agencies (CRAs): (applies to 118 118 Money)

CRAs collect and maintain information about consumers' and businesses' credit behaviour. This includes Electoral Register, fraud prevention and credit information. This will include details of previous applications and the conduct of your accounts—and public information such as County Court Judgments, decrees, and bankruptcies.

We carry out credit and identity checks when you apply for our products and services. This helps us to:

- ▶ check the information you have given us;
- ▶ check your identity;
- ▶ assess your financial status;
- ▶ analyse your spending habits and your management of your accounts with us;
- ▶ determine your chances of being accepted for our products and services;
- ▶ help detect and prevent fraud and money laundering;
- ▶ identify and, where applicable, rank the most appropriate products and services for you, taking into account your personal circumstances.

We will use CRAs who will make credit searches and will pass your information to CRAs (such as TransUnion Limited, Equifax Limited and Experian Limited). We will give details of your accounts and how you manage it/them to CRAs. We will also do this on a periodic basis to manage your accounts with us.

The CRA will supply us with both public (including the Electoral Register) and shared credit and fraud prevention information. This information may be supplied to other organisations by CRAs and fraud prevention agencies to perform similar checks and to trace your whereabouts and recover debts that you owe. We may also ask CRAs to give us information about you.

The CRAs will keep a record of this search and place a "footprint" on your credit file, whether or not the application proceeds, this is deemed a soft search during the application process and is only viewable by you.

This information may be supplied to other organisations by CRAs and fraud prevention agencies to perform similar checks and to trace your whereabouts and recover debts that you owe. We may also ask CRAs to give us information about you.

The information we provide CRAs together with any information you provided us to assess your application may be shared between us, the CRAs and fraud prevention agencies and used by them and us to make decisions, for example when:

- ▶ checking details on applications made by you;
- ▶ managing your accounts;
- ▶ recovering debt;
- ▶ checking details of job applicants and employees;
- ▶ detect and prevent crime, fraud and money laundering;
- ▶ check your credit history;
- ▶ analyse your income;
- ▶ assess your spending habits;
- ▶ verify your identity if you apply, or someone financially linked with you applies, for products or services;
- ▶ trace your whereabouts;
- ▶ undertake research, statistical analysis and systems testing;
- ▶ manage your accounts, for example, in the event that we are considering, or you ask us to consider, changing your credit limit;
- ▶ to see if you might be eligible for any of our other products and services.

Where the data we have received, identifies that the data we hold on you is inaccurate, in accordance with the accuracy principle of UK GDPR, we will ensure that the data is rectified without delay.

Monitoring for fraudulent applications (applies to 118 118 Money)

118 118 Money utilises services provided by TransUnion which assist us in identifying potentially fraudulent applications and activity. These services are able to check ID, email addresses and characteristics about the mobile phone or computing device being used to apply for or use of our financial services. For this purpose the services may include, but not be exclusive to, CallValidate UK, EmailRisk, DeviceRisk, MobileRisk, MobileSimSwap and MobileKYC.

For TransUnion to provide these services, 118 118 Money automatically transfers these details to TransUnion for their analysis and to contribute to central databases. During normal service this information is stored within the UK and European Economic Area (EEA), however, during times of recovery or business continuity, this information may be stored by TransUnion outside of the UK and EEA.

TransUnion may also use other TransUnion group companies, or approved sub-contractors, to provide these services to you.

For further information, please review the TransUnion privacy policy, which can be found at:
<https://www.transunion.co.uk/legal/privacy-centre>

Relating to the DeviceRisk service, please see the privacy policy at the link
<https://www.iovation.com/privacy>

Your rights to apply to the CRA

You have the right to apply to the CRAs for a copy of your credit file.

We use different agencies so please be aware that the information they hold may not be the same. There is a small fee that you may need to pay to each agency that you apply to. The addresses of the CRAs we currently use are:

Experian Consumer Help Service, PO Box 9000, Nottingham NG80 7WP or call 0844 481 8000 or log on to <http://www.experian.co.uk/crain/index.html>

TransUnion Consumer Services Team, PO Box 491, Leeds LS3 1WZ or call 0870 060 1414 or log on to www.TransUnion.co.uk/crain

Equifax Customer Service Centre, PO BOX 10036, Leicester LE3 4FS or call 0800 014 2955 or log on to <https://www.equifax.co.uk/crain>

You can also find out more information about the CRAs we use by reading the Credit Reference Agency Information Notice each CRA makes available on its website (see <http://www.experian.co.uk/>, <https://www.equifax.co.uk>, and www.TransUnion.co.uk). This notice will:

- ▶ tell you about the CRA;
- ▶ provide further details on the information held by the CRA and how they use it;
- ▶ let you know who the CRA shares information with and why;
- ▶ explain how the CRA works with fraud prevention agencies;
- ▶ give you information on your rights.

Using fraud prevention agencies: (applies to 118 118 Money)

As part of our due diligence when assessing your application, we have systems that protect our customers and ourselves against fraud and other crime.

Customer information can be used to prevent crime and trace those responsible. We will share your personal information from your application with fraud prevention agencies.

If false or inaccurate information is provided and fraud is identified, details of this fraud will be passed to these agencies. We and other organisations may access and use from other countries the information recorded by fraud prevention agencies. Law enforcement agencies may access and use this information.

If your details are passed to these agencies because we believe that you have committed fraud, you may find it more difficult to obtain services, finance or employment with us and other participating organisations.

We and other organisations may also access and use this information to prevent fraud and money laundering, for example, when:

- ▶ checking details on applications for credit and credit related or other facilities;
- ▶ managing credit and credit related accounts or facilities;
- ▶ recovering debt;
- ▶ checking details on proposals and claims for all types of insurance; and
- ▶ checking details of job applicants and employees.

We may also make periodic searches at fraud prevention agencies to manage your account with us.

The Fraud Prevention Agency we use is:

- ▶ CIFAS, with registered office at 6th Floor Lynton House, 7-12 Tavistock Square, London, WC1H 9LT.
- ▶ You can contact CIFAS at [https://www.cifas.org.uk/contact us](https://www.cifas.org.uk/contact-us).

Using debt collection agencies (applies to 118 118 Money)

We may have referred the collection of your debt with us to a third party and may have sent them your personal data (as per previous Privacy Policy versions), along with the financial standing of your account and advise of any missed payments, and/or balances outstanding.

There may be circumstances where your debt is returned to 118 118 Money and the third-party debt collection agency may retain your personal data for 180 days from the date the debt is returned. The purpose for this is to ensure that any queries by you or 118 118 Money can be adequately responded to. All other data retention is as per this statement.

The partner may need to refer to your personal data when contacting 118 118 Money with regard to a complaint or enquiry you raise with them.

118 118 Money does not use debt collection agencies at this time.

Using debt sale partners (applies to 118 118 Money)

We may review your debt as part of our overall collections strategy and decide that the debt is to be sold to a third party. We may negotiate with a number of debt sale organisations as part of this process.

The information we will need to send to these debt sale organisations will include personal data (contact details), banking details (your name, account number and sort code) and financial records denoting the performance of your debt with us.

In preparation for a sale, we may share this personal data with a prospective debt sale organisation where it is in our or the organisation's legitimate interests to do so, for example, to enable the organisation to process your personal data for data verification and pricing purposes.

If the sale goes ahead, we may share this personal data with a debt sale organisation where it is in our or the organisation's legitimate interests to do so, example, to enable the organisation to manage your debt and to meet its regulatory obligations or reporting requirements. In these circumstances, the organisation may use or disclose your personal data in the same way as set out in this Privacy Policy but will also be responsible for providing you with its own privacy information.

These organisations must keep your information confidential (though they may share it with credit reference agencies) and take all adequate and appropriate technical and organisational measures to keep your information confidential.

If your debt is sold by 118 118 Money to one of its debt sale partners, then you will be informed by letter.

Using debt advice partners

In circumstances where your account may be in arrears or, you may be experiencing financial difficulty, we may suggest that you engage with a debt advice provider and may provide you with appropriate options.

Analysis and processing of call recordings (applies to 118 118 Money and 118M8)

All calls to 118 118 Money are recorded for quality monitoring and training purposes. You are able to request an audio copy or transcript of your call by emailing the Data Protection Officer at dpo@118118money.com.

Analysis of your journey on our website or mobile app (applies to 118 118 Money)

We use a partner called Glassbox to help us analyse your customer experience and journey through our website and mobile app. This process enables us to see where you stop on our web/app pages and how you manoeuvre within our pages, this helps us identify areas where our customers may experience difficulties or where areas of our customer experience/journey may need improvement or changes.

All personal data within the journey is masked and not stored or seen by Glassbox.

Communications with you (applies to 118 118 Money and 118M8)

We have partnered with Braze, Inc. to provide a multi-channel communication platform for service and (where consent is given) marketing messages. Braze processes personal data on our behalf so we can send you messages by email, SMS, mobile push and in-app notifications, and to help us measure and improve how these messages perform.

When you interact with messages from us (e.g., opening a message, clicking a link), Braze may process and track engagement and interaction data to support analytics, reporting and segmentation. This information helps us understand what communications are most relevant to you and to tailor future messaging but is only used for purposes that align with the consent you have provided.

Service messages will be sent via this channel to update you about your financial product, regulatory notifications and other important information. Where you have consented to receive marketing messages, we may use Braze to send these and to personalise or improve their relevance.

We may occasionally reach out to you using Survey Monkey for your opinions to help us improve our services.

We ensure that only authorised employees with a business need can access your data via our communications systems and that appropriate security controls and contractual safeguards are in place with all partners processing personal data.

Privacy policies for our communications partners can be found below:

- <https://www.surveymonkey.co.uk/mp/legal/privacy/> (customer surveys)
- <https://www.braze.com/company/legal/privacy> (Braze messaging platform)
- <https://hightouch.com/privacy-policy> (data sync/processing between 118 118 Money and Braze)

Targeted advertising on social media platforms (applies to 118 118 Money and 118M8)

Where you have consented to receive marketing from us, we may use your contact details (such as your email address or phone number) to help show you personalised advertisements on third-party platforms, including social media providers such as Meta (Facebook and Instagram) and TikTok.

This involves securely sharing limited identifiers (for example, email addresses or phone numbers, typically in a hashed and encrypted format) so that these platforms can match you to their users and display relevant advertising on our behalf. We do not share credit card details, bank account information or other sensitive financial data for this purpose.

Meta and TikTok act as independent data controllers for the personal data they receive through this process and use that data in accordance with their own privacy policies.

You can withdraw your marketing consent at any time, which will stop this use of your personal data for targeted advertising on social media platforms.

Making payments via our telephone system (applies to 118 118 Money)

118 118 Money provides the option for you to use an electronic service for processing debit or credit card payments, for this we use the services of keyIVR. Following you choosing to make a payment, you are transferred automatically to the keyIVR service which will ask you to enter your card details (card number, expiry date and CVC) using your phone keypad. Once you have completed this, your details are processed by keyIVR and your card is tokenised, this is a secured method of ensuring that keyIVR do not store your card details.

keyIVR are a PCI-DSS compliant provider of payment services and has passed 118 118 Money's stringent security due diligence procedures. Further information can be found at <https://www.keyivr.com/pci-dss-solutions/payment-ivr/>.

Our other service providers and agents

We will share your personal information with:

- third parties involved in managing accounts and services for you or collecting what you owe to us;
- our suppliers of underwriting and analysis services;
- IT service providers including those which provide our websites and mobile app hosting and maintenance services;
- sanction screening, identity and fraud prevention check providers;
- our call centre operators;
- business process outsourcing providers;
- your digital wallet provider (Samsung, Apple or Google) for the purpose of setting up your credit card in their digital wallet service;
- HM Revenue & Customs or other authorities;
- third parties where we are required to do so by law (for example, we are required to screen applications that are made to us to ensure we are complying with the international fight against terrorism and other criminal activities) or by our regulatory bodies such as the Financial Conduct Authority or if we require or are required by others to investigate or prevent crime;
- market research companies to assist in providing better products and services for you;
- third parties who may be connected with your accounts; and
- where we are required as part of our duty to protect your accounts, for example, we are required to disclose your information to the UK Financial Services Compensation Scheme (**FSCS**).

We will also share your personal information:

- with any person from whom we borrow funds to finance our business or part of it (or with whom we enter into negotiations to finance our business) and their professional advisers;
- with any person to whom we sell, merge or transfer (or enter into negotiations to sell, merge or transfer) our business or part or all of our business or assets or enter into a merger with it;
- to a potential buyer, transferee, or merger partner or seller and their advisers so long as they agree to keep it confidential and to use it only to consider the possible transaction;
- if the transaction goes ahead, the buyers, transferee or merger partner may use or disclose your personal information in the same way as set out in this Privacy Policy.

We will always ensure your information remains safe and secure.

Why we may process special categories/sensitive personal information about you:

Some personal information under data protection law has special protection. This information is known as **special categories of personal information**, but it may also be called **sensitive personal information**. This type of personal information includes information which relates to your racial or ethnic origin, political opinions, religious beliefs or philosophical beliefs, trade union membership, genetic or biometric data or data concerning your health, sex life or sexual orientation.

When you apply to us for our products and services and, as part of managing any products and services you have with us, we may ask you for special categories of personal information. We will only use this information to provide the service you require or help to manage your products and services and/or your account.

If we need to obtain **special categories of personal information**, we will ask for your explicit consent first.

Where will we transfer your personal information?

There will be times when we share your personal information within our Group and with our third-party providers who are located in countries outside of the European Economic Area (EEA).

Your personal information will be transferred to countries outside the EEA such as the USA and the Philippines. For example, if you've got a loan or credit card with us, we use our call centre in the Philippines for customer service calls, payment reminder calls, payment collections calls and to obtain outstanding documentation from our loan customers.

When we transfer your personal information outside the EEA, we will take reasonable steps to ensure that your personal data is protected. To do this we use a set of standard data protection clauses which have been approved by the European Commission.

Whenever fraud prevention agencies transfer your personal data outside of the EEA, they impose contractual obligations on the recipients of that data to protect your personal data to the standard required in the EEA. They may also require the recipient to subscribe to 'international frameworks' intended to enable secure data sharing.

The above approach is compliant with data protection law (being Article 46.2 of the UK GDPR). For

further information about these transfers and the safeguards in place, please get in touch via the **Contacting us** section below.

How we use your personal information to make automated decisions (applies to 118 118 Money)

When you apply for our products and services, we use both a manual and an automated system known as **credit scoring** to determine your eligibility for them. This is a method of assessing your likely conduct of an account based on a range of data, including the conduct of previous similar accounts. Credit scoring is a system widely used by credit providers to help make fair and informed decisions on lending.

This means we may automatically decide that you pose a fraud or money laundering risk if our processing reveals your behaviour to be consistent with money laundering or known fraudulent conduct, or is inconsistent with your previous submissions, or you appear to have deliberately hidden your true identity. You have rights in relation to automated decision making.

If we, or a fraud prevention agency, determine that you pose a fraud or money laundering risk, we may refuse to provide the services or financing you have requested, or we may stop providing existing services to you.

A record of any fraud or money laundering risk will be retained by the fraud prevention agencies, and may result in others refusing to provide services, financing or employment to you.

Some of these decisions do not involve human input and the systems apply pre-defined logic programming and criteria to make a decision. For example, we use information about your income, expenditure, other financial commitments and payment history. This information is analysed by automated means which uses statistical models and rule-based systems to evaluate your credit worthiness, affordability and overall financial health.

Credit scoring takes into account information usually from three sources:

- the information you provide in connection with your application;
- information provided by searches conducted at CRAs and fraud prevention agencies; and
- information that may already be held about you by us or companies in our Group.

A credit scoring system will consider information from these sources to make an overall assessment of your application. This assessment will extend to anyone with whom you are linked financially or other members of your household.

The information we obtain may be used:

- to check the information you have given us;
- debt tracing;
- analysing your income and spending habits;

- for the detection and prevention of fraud or money laundering;
- the management of our service to you.

If you provide a credit or debit card as part of your application or as part of a continuous payment authority (CPA), we may also use a third party to check the validity of the sort code, account code and card number that you submit in order to prevent fraud. The information you provide us will be transferred to CRAs and fraud prevention agencies who will record details of any search whether or not your application succeeds.

We may transfer personal and financial data to partners called DataRobot Inc. and TakTile, they assist us in refining our lending strategy. The credit scoring methods used are regularly tested to ensure they remain fair, effective and unbiased. Using a credit scoring system helps us to lend responsibly.

Your rights to challenge automated decision making

You have the right to challenge any automated decision with us directly. You can ask that we do not make automated decisions about you and you can object to an automated decision and ask that a person reviews it.

If you want to know more details about your rights, please get in touch via the **Contacting us** section below.

Use of generative artificial intelligence (AI) technology

118 118 Money has published an Acceptable Use of Generative AI Policy and will not include any personal data of customers or employees into any generative AI tool (such as ChatGPT, CoPilot etc.) which is used for open learning.

Any tool where 118 118 Money has risk assessed and assured that the personal data is not used for training the AI is permitted, though use must be stated.

As of the date of this Policy, we use generative AI tools in the following ways:

- Amazon AWS AI – We employ a suite of AWS AI services and tools to screen and analyse all customer service channels, for the purpose of quality assurance, continuous improvement and all activities associated with improving customer satisfaction.
- Court Correct – use of Court Correct AI tools to review your complaints case and assist in providing a final response.
- Budgie – use of Budgie AI for helping you complete income and expenditure forms to help manage your account and payments with 118 118 Money.

Asking you for reviews of our products and services

After you have applied for one of our products, we may send your email address to TrustPilot who may ask you to leave a review of the service you have been provided. Should you not wish to leave a review or wish TrustPilot to stop processing your personal data, please contact TrustPilot as stated in their Privacy Policy, <https://uk.legal.trustpilot.com/for-reviewers/end-user-privacy-terms>.

Should you download our 118 118 Money or 118M8 app via the Google Play Store or Apple AppStore and leave a review, we may reach out to you to thank you for your review or to determine any issues you may have in accessing your account or with our app. We will only contact you if we are able to determine unique data to identify you as an individual and we will not divulge any

personal data during that conversation (email, chat or telephone) without requiring identification and verification checks to be passed to ensure that we are speaking to you.

Retention of your personal information

How long we keep your information for depends on the basis on which it was provided.

Generally, however, we will keep the information that is necessary to enable us to provide you with the products or services you have requested through our websites for as long as it takes us to provide that product or service.

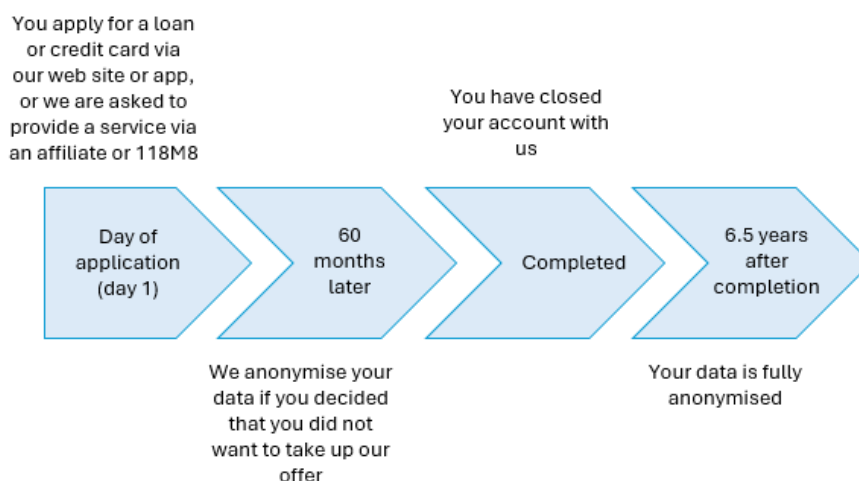
If you have asked that we do not use your details for marketing purposes, we may still need to keep them to ensure our systems reflect your preferences.

We will keep records of any transactions you enter into on our websites for a minimum of 6.5 years from the end of our relationship with you. This is so that we can respond to any complaints or disputes that arise in that period.

Retention of your personal data can be demonstrated by this diagram for 118 118 Money:

Fraud prevention agencies may hold your personal data for different periods of time, and if you are considered to pose a fraud or money laundering risk, they may hold your data for up to six years.

Your personal data lifecycle



Anonymisation is a process of removing personal data so that it cannot be directly traced back to an individual. For example, we will always remove your name, though we may retain elements of your date of birth (but never the day), and we may retain the first 4 characters of your postcode. This enables us to conduct analysis on the performance of our services and helps us to improve the products we may provide in the future.

Retention for 118M8 data

If you use the 118M8 mobile application and do not register for an account, or you do not sign in using your 118 118 Money account, then your data is held locally on your mobile device and erasing the application removes the data.

Where you have registered for an account, or you use your 118 118 Money account to access the features of 118M8, your data is retained as above.

Links to third party websites

Our websites (www.118118money.com and www.118m8.com) contains links to other websites over which we have no control.

We are not responsible for privacy policies or practices of other websites to which you choose to link from our websites. We encourage you to review the privacy policies of those other websites so you can understand how they collect, use and share your information.

Marketing

If you opted in to receive newsletters, commercial emails or other communications from us or selected third parties but subsequently change your mind, you may opt-out by [Contacting us](#) as set out at the end of this Privacy Policy.

Cookies (applies to www.118118money.com and www.118m8.com)

We use cookies on our websites (www.118118money.com and www.118m8.com) to distinguish you from other users of the websites. This helps us to provide you with a good experience when you browse our websites and also allows us to improve the websites.

You have the option to customise the optional cookies, or reject all optional cookies as required by the Information Commissioner's Office (ICO).

For information on the cookies we use, and the purposes for which we use them, please see our [Cookie Policy](#).

App tracking technologies (applies to 118 118 Money and 118M8 mobile applications)

Where you have provided your consent, we use optional analytics and marketing SDKs within our mobile applications to help us measure performance, understand how users engage with our apps, and improve our services and communications.

These include:

- **Google Analytics**, which we use to understand how users interact with our mobile applications (for example, app usage patterns, feature engagement and performance metrics);
- **Braze**, which we use to deliver service and marketing messages (where consent is given) and to analyse engagement with those communications, such as message opens, clicks and in-app interactions;
- **Meta (Facebook and Instagram)** and **TikTok Technology (TikTok)**, which we use to measure advertising performance, app installs and in-app activity following marketing campaigns, and to optimise how our marketing is delivered.

When enabled, these SDKs may collect information such as device identifiers, app interaction events, IP address and engagement data. We do not share credit card numbers, account credentials or sensitive financial information through these SDKs.

Google Analytics and Braze act as data processors on our behalf and process personal data only in accordance with our instructions. Meta and TikTok act as independent data controllers for the data they receive through their SDKs and use that data in line with their own privacy policies.

These technologies are used only where you have given your consent, which you can manage or withdraw at any time through your app privacy settings or device controls.

Contacting us:

If you have any questions about this Policy or your personal information and/or if you wish to see what information we hold about you, please contact the Data Protection Officer on dpo@118118money.com.

If you no longer wish to receive any marketing communications or wish us to stop using your personal information, please contact us:

By accessing your 118 118 Money customer portal or via the 118 118 Money app. Login to your account, via a browser, and go to the Marketing Preferences section.

By phone: 02920 548 118, this call will be charged by your provider as UK national number.

By mail: Data Protection Officer, 118 118 Money, 5th Floor, 1 Capital Quarter, Tyndall Street, Cardiff, CF10 4BZ

By email: dpo@118118money.com

How to complain

If you think there is a problem with how your personal information is being handled, you have a right to complain to the Information Commissioner's Office (**ICO**).

The ICO can be contacted on 0303 123 1113 or please visit their website at www.ico.org.uk.

DATA PROTECTION STATEMENT

LOANS CUSTOMERS – 118 118 MONEY

WHEN APPLYING FOR A LOAN ON OUR WEB SITE OR VIA A MOBILE APP

Type of data	Why do we need this information?	Source of data	Where stored?	Shared with another company?	Retained for?
Name (including Title, First name and Surname)	<p>Identification during application process</p> <p>ID verification if you call us</p> <p>Checking for duplicate applications (potential fraud)</p>	You	<p>Ireland & UK</p> <p>Internal customer databases</p> <p>Data-warehouse</p> <p>Email system</p> <p>EU</p> <p>ZeroBounce email verification</p>	<p>Yes</p> <p>TransUnion</p> <p>Experian</p> <p>Equifax (credit reference and scoring)</p> <p>ZeroBounce – email address verified by ZeroBounce to ensure that we have captured live email account details.</p>	<p>See application decision for retention periods</p> <p>ZeroBounce retain checked email addresses for a maximum of 30 days.</p>
Email address	Contact during application process				
Mobile number	Checking for duplicate applications (potential fraud)				
Date of birth	<p>Identification during application process</p> <p>ID verification if you call us</p> <p>Checking for duplicate applications (potential fraud)</p>				
Net monthly income	Affordability checks during application process				
Monthly outgoings	Affordability checks during application process				
Address including postcode	<p>Identification during application process</p> <p>ID verification if you call us</p>				
Time at address	Identification during application process				

Type of data	Why do we need this information?	Source of data	Where stored?	Shared with another company?	Retained for?
Residential Status	Identification during application process	You	Ireland & UK Internal	Yes TransUnion Experian Equifax (credit reference and scoring)	See application decision for retention periods
Bank Details (including account holder, sort code and account number)	During application as part of identification process	You	Ireland & UK Internal credit card customer databases data-warehouse	Yes TransUnion, for their CallValidate service to verify identification	6 years, 6 months from the termination of your credit card agreement with us, if application is successful

To help with checking your affordability of our product(s), we may also ask the number of dependants you have, your marital status, any additional household income, other credit commitments and essential expenses.

All of the above personal data types may also be used for ensuring that your application is not fraudulent and will also be provided to our third-party PEPs and Sanctions partner, Factiva Limited, via their Compliance Assist software to ensure that we are legally permitted to lend to you.

FOR LOANS PRODUCTS – CUSTOMERS OF 118 118 MONEY

IF YOU ARE REFERRED TO OUR UNDERWRITING TEAM (IN ADDITION TO THE APPLICATION PERSONAL DATA)

Type of data	Why do we need this information?	Source of data	Where stored?	Shared externally?	Retained for?
Name (including Title, First name and Surname)	Identification during application process ID verification if you call us	You	Ireland & UK Loan management system Data-warehouse Email system	Yes Passed to credit reference agencies (TransUnion and Experian)	See application decision for retention periods
Email address	Contact during application process		EU ZeroBounce email verification	Yes - ZeroBounce – email address verified by ZeroBounce to ensure that we have captured live email account details.	ZeroBounce retain checked email addresses for a maximum of 30 days.
Mobile number	Contact during application process			No	
Date of birth	Identification during application process ID verification if you call us			Yes Passed to credit reference agencies (TransUnion and Experian)	
Employer	Identification during application process			No	
Net monthly income	Affordability checks during application process			No	
Monthly outgoings	Affordability checks during application process			No	
Address including postcode	Identification during application process ID verification if you call us			Yes Passed to credit reference agencies (TransUnion and Experian)	
Time at address	Identification during application process				

continued on next page

Type of data	Why do we need this information?	Source of data	Where stored?	Shared externally?	Retained for?
Name, address, date of birth	PEPs and Sanctions checking	You	UK	Yes Factiva (Compliance Assist)	See application decision for retention periods
Marital Status	To review financial relationships with others	You	Ireland & UK Loan management system Data-warehouse	No	See application decision for retention periods
Bank details	Identification during application process				
Nationality or confirmation of being UK citizen	We can only provide service to UK citizens or those with right to reside in the UK				
Debit card Details	Identification during application process				

All of the above personal data types may also be used for ensuring that your application is not fraudulent and will also be provided to our third-party PEPs and Sanctions partner, Factiva Limited, via their Compliance Assist software to ensure that we are legally permitted to lend to you.

CREDIT REPORT CHECKING AND ID VALIDATION

Type of data	Why do we need this information?	Source of data	Where stored?	Shared externally?	Retained for?
TransUnion (CallValidate)	Check validity of bank account	TransUnion	Ireland & UK Loan management system Data-warehouse	No	See application decision for retention periods
TransUnion (Credit Search)	Assessment of current and previous lending				
TransUnion (TAC)	Affordability checks as required by FCA				
Experian	Affordability checks as required by FCA	Experian	Ireland & UK Loan management system Data-warehouse		See application decision for retention periods

Type of data	Why do we need this information?	Source of data	Where stored?	Shared externally?	Retained for?
Bank statements	Affordability checks as required by FCA	You	Ireland & UK Loan management system Data-warehouse		See application decision for retention periods
Photo identification	Identification verification				
Right to reside	We can only provide service to UK citizens or those with right to reside in the UK				

REPORTING OF POTENTIALLY FRAUDULENT LOAN APPLICATIONS

Type of data	Why do we need this information?	Source of data	Where stored?	Shared externally?	Retained for?
Personal information provided by you during the loan application process	To CIFAS for reporting potential fraudulent activity	Loan management system	Ireland & UK Loan management System Data-warehouse	Yes CIFAS	6 years from date uploaded
Loan application date					

APPLICATION DECISION – IF YOU ARE AUTOMATICALLY DECLINED OR WE HAVE ASSESSED YOUR APPLICATION AS NOT BEING ELIGIBLE/YOU CHOOSE NOT TO PROCEED WITH YOUR LOAN APPLICATION/YOU WITHDRAW FROM THE AGREEMENT

Type of data	Why do we need this information?	Source of data	Where stored?	Shared externally?	Retained for?
CallValidate	Check validity of bank account	TransUnion	Ireland & UK Loan management system Data-warehouse	No	60 months
Credit Search	Assessment of current and previous lending				
TAC	Affordability checks				
Experian	Affordability checks	Experian	Ireland & UK Loan management system Data-warehouse		

Type of data	Why do we need this information?	Source of data	Where stored?	Shared externally?	Retained for?
All personal information provided by you during application	To refine our scoring procedures	You (with permission to re-use)	<p>UK Loan declines database</p> <p>Ireland Data-warehouse</p>	<p>Yes, Passed to credit reference agency (TransUnion: https://www.TransUnion.co.uk/crain) maximum twice within 24 months</p>	

LOAN APPLICATION IS DECLINED/NOT TAKEN UP/WITHDRAWN

Where we have declined your application, we may provide you with alternative options through our partners; by proceeding you will be asked to accept the partner's data processing agreement.

Analytics and Scoring Procedures

As mentioned in row 5 above, 118 118 Money may retain your personal data if you are declined as a loan customer, or decide not to proceed with your loan application, for the purpose of improving the scorecards for our financial services products.

The legitimate interest requirement is to enable us to further refine our scoring based on the information submitted as part of the application process. This applies to both declined and approved customers. This information may be passed to relevant third parties (such as Credit Reference Agencies) to assist us in building better models for credit scoring in the future.

This information is retained for declined applications for 60 months, after which it will be anonymised.

APPLICATION DECISION – APPROVED FOR A LOAN

Type of data	Why do we need this information?	Source of data	Where stored?	Shared	Retained for?
Agreement number	For loan products, you are assigned a unique reference number.	System generated	Ireland & UK Loan management system	No	End of product term + 6 years and 6 months
CallValidate	Check validity of bank account	TransUnion	Data-warehouse	No	End of product term + 6 years and 6 months
Credit Search	Assessment of current and previous lending				
TAC	Affordability checks				
Credit score	Score indicating credit worthiness				
Experian	Affordability checks	Experian	Ireland & UK Loan management system Data-warehouse	No	End of product term + 6 years and 6 months
Bank details Debit card details	Processing of payment of your loan and providing a backup payment method	You	Ireland & UK Loan management system	Yes, debit card tokenised by Worldpay or KeyIVR	End of product term + 6 years and 6 months

All of the above personal data types may also be used for ensuring that your application is not fraudulent and will also be provided to our third-party PEPs and Sanctions partner, Factiva Limited, via their Compliance Assist software to ensure that we are legally permitted to lend to you.

IF YOU ARE IN ARREARS, WE MAY RECEIVE THIS INFORMATION FROM A THIRD PARTY

Type of data	Why do we need this information?	Source of data	Where stored?	Shared externally?	Retained for?
Financial Statement	Assessment of ability to repay your debt	Debt Management Company	Ireland & UK Loan management system Collections task system Internal Network Drive Data-warehouse	Yes Financial Ombudsman (where appropriate) Financial Conduct Authority (where appropriate)	End of product term + 6 years and 6 months
List of other creditors including reference numbers	Analysing your payment behaviour with 118 118 Money and other creditors to assess whether we are able to help with your financial situation	Insolvency Practitioner			
Motor Vehicle details		Credit reference agencies			
Personal information of Partner/Family members					
Age of dependent					
Total Liabilities					
Asset information including values					
Estimated Deficiencies					
Credit reference agency/credit file payment history					
Customer circumstances					
Medical professional information including Name and address.					
Medical History					

MARKETING MESSAGES (WHERE YOU HAVE OPTED IN) (applies to 118 118 Money and 118M8)

Type of data	Why do we need this information?	Source of data	Where stored?	Shared externally?	Retained for?
Name	For sending personalized marketing messages based on the preferences you have stated and your interest in our products and services.	You	Ireland & UK Customer Relationship Management System	Yes	Until you opt out of receiving marketing messages
Address including postcode					
Mobile number					
Email address			EU ZeroBounce email verification Braze – email system	Email addresses are verified by ZeroBounce to ensure that we are sending to live email accounts.	ZeroBounce retain checked email addresses for maximum of 30 days.

You are able to manage your marketing preferences by logging into your online account, via the 118 118 Money mobile app or by calling our Customer Services team.

Marketing consent will demonstrate the ability to customise marketing by feature and channel.

The default setting for marketing is opt-out by all methods.

The above may be shared with selected third parties in circumstances where you have provided permission for this.

DATA PROTECTION STATEMENT

CREDIT CARD CUSTOMERS – 118 118 MONEY

WHEN APPLYING FOR A CREDIT CARD ON OUR WEB SITE OR VIA A MOBILE APP

Type of data	Why do we need this information?	Source of data	Where stored?	Shared with another company?	Retained for?
Name (including Title, First name and Surname)	<p>Identification during application process</p> <p>ID verification if you call us</p> <p>Checking for duplicate applications (potential fraud)</p>	You	<p>Ireland & UK</p> <p>Internal credit card customer databases</p> <p>Data-warehouse</p> <p>Email system</p> <p>EU</p> <p>ZeroBounce email verification</p>	<p>Yes</p> <p>TransUnion</p> <p>Experian</p> <p>Equifax (credit reference and scoring)</p> <p>ZeroBounce – email address verified by ZeroBounce to ensure that we have captured live email account details.</p> <p>TSYS – shares with Twilio for SMS potential fraud notifications. Twilio are based in the USA.</p>	<p>See application decision for retention periods</p> <p>ZeroBounce retain checked email addresses for a maximum of 30 days.</p>
Email address	<p>Contact during application process</p> <p>Checking for duplicate applications (potential fraud)</p> <p>SMS notifications for card blocked for potential fraud</p>				
Mobile number					
Date of birth	<p>Identification during application process</p> <p>ID verification if you call us</p> <p>Checking for duplicate applications (potential fraud)</p>				
Net monthly income	Affordability checks during application process				
Monthly outgoings	Affordability checks during application process				
Address including postcode	<p>Identification during application process</p> <p>ID verification if you call us</p>				

REPORTING OF POTENTIALLY FRAUDULENT CREDIT CARD APPLICATIONS

Type of data	Why do we need this information?	Source of data	Where stored?	Shared externally?	Retained for?
Personal information provided by you during the loan application process	To CIFAS for reporting potential fraudulent activity	Third Party TSYS (Credit card management)	Third Party TSYS (Credit card management)	Yes CIFAS	6 years from date uploaded
Credit card application date					

CREDIT CARD APPLICATION IS DECLINED/NOT TAKEN UP/WITHDRAWN

Where we have declined your application, we may provide you with alternative options through our partners; by proceeding you will be asked to accept the partner's data processing agreement.

Analytics and Scoring Procedures

118 118 Money may retain your personal data if you are declined as a credit card customer or decide not to proceed with your credit card application, for the purpose of improving the scorecards for our financial services products.

The legitimate interest requirement is to enable us to further refine our scoring based on the information submitted as part of the application process. This applies to both declined and approved customers. This information may be passed to relevant third parties (such as Credit Reference Agencies) to assist us in building better models for credit scoring in the future.

This information is retained for declined applications for 60 months, after which it will be anonymised.

CREDIT CARD APPLICATION IS APPROVED

Type of data	Why do we need this information?	Source of data	Where stored?	Shared with another company?	Retained for?
Name (including Title, First name and Surname)	ID verification if you call us	You	Third Party – UK TSYS (credit card management) Ireland & UK 118 118 Money database records Data-warehouse Email system	Yes TSYS (credit card management) Idemia (printing of plastics, card mailers, PIN mailers) Paragon Group (management of outgoing mail and statements)	6 years, 6 months from the termination of your credit card agreement with us

Email address				Yes TSYS (credit card management)
Mobile number				
Date of birth				
Address including postcode				Yes TSYS (credit card management) Idemia (printing of plastics, card mailers, PIN mailers) Paragon Group (management of outgoing mail and statements)

continued on next page

Type of data	Why do we need this information?	Source of data	Where stored?	Shared with another company?	Retained for?
Name (as shown on credit card)	<p>To print plastic card showing your name</p> <p>To answer your questions through customer services, fraud investigations or collections team.</p> <p>To send you regular service-related mail and monthly statements</p>	You	<p>Third Party – UK TSYS (credit card management)</p> <p>Ireland & UK 118 118 Money database records Data-warehouse</p>	<p>Yes TSYS (credit card management) Idemia (printing of plastics, card mailers, PIN mailers)</p>	6 years, 6 months from the termination of your credit card agreement with us
Primary Account Number (PAN – 16-digit credit card number)	<p>To refer to your account along with your name, address and other personal data</p> <p>Printing on your credit card</p> <p>Used as a reference in reporting within 118 118 Money</p>	<p>Third Party TSYS (Credit card management) Originating from Mastercard</p>	<p>Third Party – UK TSYS (credit card management)</p>	<p>Yes TSYS (credit card management) Idemia (printing of plastics, card mailers, PIN mailers) Paragon Group (management of outgoing mail and statements)</p>	6 years, 6 months from the termination of your credit card agreement with us
<p>Bank details (Including Bank Account Number, Sort Code)</p> <p>And Account Holder name for Direct Debit)</p> <p>Debit card details</p>	<p>For taking regular payments via direct debit or the backup debit card.</p>	You		<p>Yes TSYS (credit card management)</p>	
<p>Credit Card details (including card number, expiry date and balance to transfer)</p>	<p>For the purpose of transferring a balance from another card provider to your 118 118 Money Credit Card.</p> <p>We may also use this information plus your name to verify that the credit card is yours.</p>	You		<p>Third Party – UK TSYS (credit card management)</p>	6 years, 6 months from the termination of your credit card agreement with us

IF YOU ARE IN ARREARS, WE MAY RECEIVE THIS INFORMATION FROM A THIRD PARTY

Type of data	Why do we need this information?	Source of data	Where stored?	Shared externally?	Retained for?
Financial Statement	Assessment of ability to repay your debt	Debt Management Company	Ireland & UK Loan management system Collections task system Internal Network Drive Data-warehouse	Yes Financial Ombudsman (where appropriate) Financial Conduct Authority (where appropriate)	End of product term + 6 years and 6 months
List of other creditors including reference numbers	Analysing your payment behaviour with 118 118 Money and other creditors to assess whether we are able to help with your financial situation	Insolvency Practitioner			
Motor Vehicle details		Credit reference agencies			
Personal information of Partner/Family members					
Age of dependent					
Total Liabilities					
Asset information including values					
Estimated Deficiencies					
Credit reference agency/credit file payment history					
Customer circumstances					
Medical professional information including name and address	Medical Professional				
Medical History					

MARKETING MESSAGES (WHERE YOU HAVE OPTED IN)

Type of data	Why do we need this information?	Source of data	Where stored?	Shared externally?	Retained for?
Name	For sending personalized marketing messages based on the preferences you have stated and your interest in our products	You	Ireland & UK Customer Relationship Management system EU ZeroBounce email verification Braze email system	Yes Email addresses are verified by ZeroBounce to ensure that we are sending to live email accounts.	Until you opt out of receiving marketing messages ZeroBounce retain checked email addresses for maximum of 30 days.
Address including postcode					
Mobile number					
Email address					

You are able to manage your marketing preferences by logging into your user portal, via the mobile app or by calling our Customer Services team.

The default setting for marketing is opt-out by all methods.

The above may be shared with selected third parties in circumstances where you have provided permission for this.

The notifications you receive via our 118 118 Money and/or 118M8 mobile applications are controlled by you in the Notifications setting of your mobile device.

IF YOU CHOOSE TO ADD AN ADDITIONAL CARDHOLDER AT ANY TIME

Type of data	Why do we need this information?	Source of data	Where stored?	Shared with another company?	Retained for?
Name of additional cardholder (as shown on credit card)	To print plastic card showing their name Identification when you contact us	You	Third Party TSYS (credit card management)	Yes TSYS (credit card management) Idemia (printing of plastics, card mailers, PIN mailers) Paragon , name for statements	6 years, 6 months from the termination of the main account holder's credit card agreement with us
Name (including Title, First name and Surname) of additional cardholder	To register details	You (We assume that you have permission from the additional cardholder)		Yes TSYS (credit card management)	

Date of birth of additional cardholder	To ensure that the additional cardholder is over the age of 18	to use their personal information)			
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Type of data	Why do we need this information?	Source of data	Where stored?	Shared with another company?	Retained for?
Address of additional cardholder (including postcode)	Requirement is that the additional cardholder lives at the same address as the main cardholder	You (We assume that you have permission from the additional cardholder to use their personal information)	Third Party TSYS (credit card management)	Yes TSYS (credit card management)	6 years, 6 months from the termination of the main account holder's credit card agreement with us
Mobile number of additional cardholder	For providing service messages relating to the additional cardholder Identification when you contact us				
Relationship to main cardholder	Terms and conditions require additional cardholder to be a family member				
Primary Account Number (PAN – 16-digit credit card number)	To refer to your account along with your name, address and other personal data Printing on your credit card Used as a reference in reporting within 118 118 Money	Third Party TSYS (Credit card management) Originating from Mastercard		Yes TSYS (credit card management) Idemia (printing of plastics, card mailers, PIN mailers)	

DATA PROTECTION STATEMENT

118M8 users

HOW WE COLLECT AND USE YOUR PERSONAL INFORMATION

The 118M8 mobile application will allow you to have an overview of your spending habits and provides you with support and access to financial fitness products from 118 118 Money or other third parties that we may introduce you to upon request.

When you use our Financial Fitness App, we may need to collect certain personal information that you provide to us, either directly or through your 118 118 Money online account where applicable.

From March 2026, you are able to use the 118M8 mobile application as a Guest without providing any personal data or you can choose to pay for a subscription service which will provide additional budgeting features.

If you register for an account, or connect your 118 118 Money account with 118M8, then limited personal data will be collected. This Privacy Policy will be updated regularly as the 118M8 application features evolve.

This personal information may include:

- Name
- Email address
- Mobile phone number
- Date of birth
- Postal address
- Residential status
- Your 118 118 Money account details

If you are a 118 118 Money credit card customer, we will make your transactional history available for categorisation and analysis in the 118M8 app.

Transaction categorisation

To help you understand your spending and provide meaningful insights in the 118M8 app, we use a specialist third-party provider, Snowdrop Solutions, to categorise credit card transactions.

We send Snowdrop limited transaction information, such as the transaction amount, date and merchant description. We do not share cardholder names, card numbers, account details or contact information.

In some cases, the merchant description may include the name of a sole trader or small business owner, which may constitute personal data under data protection law. Snowdrop processes this information solely to return a spending category and does not use it for any other purpose.

We rely on our legitimate interests as the lawful basis for this processing, as it is necessary to provide customers with clear, useful spending insights and does not override the rights or interests of individuals. Appropriate contractual, security and data minimisation safeguards are in place.

We have set out our reasons for using your personal information in the table below under the heading Legal Basis.

Purpose	Legal Basis
<p>To assist in the ongoing administration of your 118M8 products and services, in accordance with our terms and conditions which if entered into, will be a contract between us, we will use information we receive from you for the following purposes.</p> <ul style="list-style-type: none"> • General account handling and service-based communications, such as those required by regulatory obligations; • Analyse your spending activities and provide summaries of your spending habits and “nudges” for what might improve your overall financial fitness; • Tell you about important changes or developments to the features and operation of your products and services; Transaction categorisation and enrichment providers (such as Snowdrop Solutions). 	<p>Legitimate interests: we require your personal information to enable us to process your information and provide you with our financial assessment services.</p> <p>Performance of a contract: we have with you for the use of our 118M8 mobile application.</p>
<p>Based on your instructions, we may use your personal information to tell you about certain products, offers or services from 118 118 Money or our third-party affiliates.</p> <p>This may include promotional offers, cash back offers, lending offers or other financial fitness opportunities which we consider are relevant to you.</p> <p>Where you have consented to receive marketing messages, these marketing messages will be sent to you by SMS, email or through Braze Inc.'s secure messaging platform, depending on your chosen preferences.</p>	<p>Consent: we will obtain your explicit consent to use your personal information for these marketing purposes.</p> <p>If you no longer wish to receive any marketing communications from us or selected third parties, you may opt-out by [Contacting us] as set out at the end of this Privacy Policy.</p>
<p>Where you request further information about a financial product that is offered by a third party or wish to apply for a financial product that is offered by a third party, via our 118M8 mobile application, we may need to disclose your personal information with that third party.</p> <p>Please note that where you wish to apply for a financial product offered by a third party through the 118M8 mobile application, that product offering will be governed by the terms and conditions of that third party and 118 118 Money will not be responsible for such third-party product.</p>	<p>Performance of a contract: we have with you for the use of our 118M8 mobile application.</p>

<p>To comply with legal and regulatory obligations, as well as legitimate interests, for example fraud prevention, we will:</p> <ul style="list-style-type: none"> • Administer, update, consolidate, improve and manage the accuracy of our records and our business including but not limited to meeting legal, regulatory and compliance requirements and operating rules (such as anti-money laundering, regulatory reporting requirements and record maintenance). • Monitor and analyse the use of any account to detect, prevent, investigate, prosecute and/or report fraud, terrorism, misrepresentation, security incidents or crime. <p>We will also use information we receive from fraud prevention agencies.</p>	<p>Necessary for compliance with a legal obligation to which we are subject.</p>
<p>When you download the 118M8 mobile application, we may collect information about your use of it including, where available:</p> <ul style="list-style-type: none"> • your IP address, IP address location (city and country) and Internet Service Provider (ISP); • operating system and browser type and version; • the type of device(s) you use • your email address • your mobile phone number <p>We use this information for system administration and product development.</p>	<p>Performance of a contract we have with you and our legitimate interests: to enable you to receive our products and services in certain formats.</p>
<p>When you login to your online account or access your account via our mobile application, we will use the mobile phone number you have provided to send you a one-time passcode to act as an additional verification during the login process.</p>	<p>Use for secure authentication of your login details to protect you from fraud.</p>
<p>Where you have, or subsequently are approved for, a 118 118 Money Credit Card, the transactions of payments and expenditure on that card will also be shown in your 118M8 mobile application to help you understand your credit position.</p>	<p>We rely on our legitimate interests as the lawful basis for this processing — to help you manage your credit more effectively and responsibly.</p>
<p>If you are a 118 118 Money customer, we will recognise you from the personal data you provide in 118M8 and connect your accounts, providing you with a single login across 118 118 Money</p>	<p>Performance of a contract and legitimate interests (to enable you to access and manage your 118 118 Money services securely</p>

<p>services.</p> <p>If you are not yet a 118 118 Money customer, we will use the personal data you provide in 118M8 to create and connect accounts in both 118 118 Money and 118M8, giving you one secure login for accessing the services we deliver through both platforms.</p> <p>Because these form part of the same 118 118 Money service, accounts cannot be unlinked, but you may close your account or request deletion.</p>	<p>and efficiently).</p> <p>To register, create, and maintain your account and the services we provide via the 118 118 Money website, app, and the 118M8 app.</p>
<p>To enhance your experience in our 118M8 and 118 118 Money proposition</p> <p>We use data about how you use our apps and services — together with any connected information or accounts — to understand what features are most useful, to tailor your in-app experience, and to provide timely and relevant offers that may benefit you.</p> <p>This may include profiling based on your behaviour in the app (for example, how often you log in, what tools you use, or how you interact with insights) and on data connected to your account (for example, transaction insights or budgeting trends). We do this to help ensure the content you see is meaningful, useful and aligned to your financial needs.</p> <p>Where our personalised recommendations amount to direct marketing, we will only send these in compliance with PECR and your marketing preferences. You can control these preferences at any time and will be provided an opt-out at each message.</p>	<p>Legitimate interests: We rely on our legitimate interest to improve and personalise how our services work, and to offer products or features that are relevant to your financial situation. We assess these interests carefully to ensure they do not override your rights and freedoms, and you can object to this type of processing at any time within the app or by contacting us.</p>
<p>To provide and manage access to optional subscription-based features within the 118M8 mobile application, we will process limited personal information to facilitate your subscription.</p> <p>If you choose to subscribe to enhanced features, your payment will be processed by Apple App Store or Google Play Store (as applicable), and we will use a third-party service provider, RevenueCat, to manage subscription status and entitlements.</p>	<p>Performance of a contract: this processing is necessary to provide you with the subscription services you have chosen to purchase and to deliver the associated features within the 118M8 mobile application.</p>

<p>We will only share a unique user identifier with RevenueCat for the purpose of linking your subscription purchase to your 118M8 account. RevenueCat does not process your payment card details, and all billing is handled directly by the relevant app store provider.</p> <p>This processing enables us to activate, maintain, and manage your access to subscription features, including verifying your subscription status, handling renewals, and providing associated in-app functionality.</p>	
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Analytics, Modelling and Product Development (118M8)

We may retain and use personal data collected through your use of the 118M8 mobile application for the purposes of analytics, modelling, and the development and improvement of our financial products and services.

This includes personal data you provide directly, data generated through your use of the app, and data obtained from third parties such as Credit Reference Agencies and Open Banking providers (where you have given your consent).

We use this information to better understand customer behaviour, enhance the functionality of the 118M8 app, improve our financial fitness tools, refine credit risk and affordability models, and support the development and offering of lending and other financial products that may be relevant to you.

Where you have subscribed to additional 118M8 features, this processing may continue even if you cancel your subscription or close your account, to the extent permitted by applicable law.

We rely on our legitimate interests to carry out this processing, namely to improve our products and services, enhance customer outcomes, and support responsible lending. We assess these interests carefully to ensure they do not override your rights and freedoms.

Your personal data used for these purposes will be retained in identifiable form for no longer than the maximum term of our loan products, and in any event no more than 60 months, after which it will be anonymised so that it can no longer be linked back to you. Once anonymised, the data may be retained for longer periods for statistical analysis, modelling, and product development.

You have the right to object to us using your personal data for these purposes, or to ask us to delete it in certain situations. If you contact us, we will review your request and stop using or delete your data where we can. In some cases, we may need to continue using or keep your data if we have a valid reason, such as a legal requirement.

If you would like to make a request, please contact our Data Protection Officer at dpo@118118money.com, and we will be happy to help.

Changes to this Privacy Policy

If our Privacy Policy changes in any way, we will place an updated version on this page. Regularly reviewing this page ensures that you are always aware of what information we collect, how we use it and under what circumstances, if any, we will share it with other parties.

Where appropriate we will give you reasonable notice of any changes.

This Privacy Policy was last updated in June 2026.

Changes table

Version number	Publication month/year
v43	Jun 2026 (current version)
Changes made	
Updates relating to complaints process as required under the Data Use and Access Act (2025).	
Version number	Publication month/year
v42	Mar 2026
Changes made	
Privacy policy updated to include reporting requirements to FCA. Use of Taktile from March 2026 for assisting 118 118 Money in credit decisions. Processing of personal data for analytical purposes updated to provide support for the maximum loan term of 60 months. Confirmed data controller for social media platform, TikTok. Addition of open banking services via D•One to provide categorisation and spend analysis. Addition of RevenueCat personal data processing in relation to 118M8 paid-for subscriptions. Notification of decisioning migration affecting soft credit searches.	
v41	Jan 2026
Changes made	
Privacy Policy updated to explain new ways we use data, including using recent Open Banking information to offer additional lending and partnerships with social media platforms for online marketing, where consent is given. We've also added details about new systems and third-party partners used for fraud prevention, text message alerts, transaction analysis, and approved software tools.	
Version number	Publication month/year
v40	Nov 2025
Changes made	
Processing changes in support of launch of 118M8 app and any data tracking we may employ. Enforcement of the Data Use and Access Act 2025 regulation supporting GDPR/DPA/PECR.	
Version number	Publication month/year
V39	May 2025
Changes made	
Clause additions, introduced use of Court Correct in the generative AI section.	

Your Data Rights (under UK GDPR, the Data Protection Act 2018 and the Data Use and Access Act 2025)

You have certain rights regarding your personal information. These rights apply in specific circumstances and may be subject to lawful exemptions.

Full details of the information we hold about you and your relationship with 118 118 Money are set out in the Customer Data Protection Statement sections — please select whether you are a 118 118 Money (loan or credit card) customer or a 118M8 mobile app customer.

1. Be informed

This privacy statement explains why, how and where we process your personal data, who we may share it with and how long we keep it.

In line with the *Data Use and Access Act 2025 (DUAA)*, we also explain where your data may be made available through accredited data access arrangements or intermediaries, and how you can exercise control over such sharing.

2. Access your data

You have the right to request a copy of the personal data we hold about you. To access your data, please email your subject access request to dpo@118118money.com.

Under DUAA, you may also ask us to make certain financial data securely available to another provider or accredited third party, where applicable. Please include "DUAA request" in the subject line for these requests.

3. Correct or update your data

If you believe the information we hold about you is inaccurate or incomplete, please contact our Customer Services team.

4. Delete your data (right to erasure)

You may request deletion of your personal data by contacting dpo@118118money.com. Please tell us which data you want deleted and why.

5. Restrict processing

You may ask us to restrict processing of your data (so we store it but do not actively use it). Please contact the Data Protection Officer using the email address above.

6. Data portability and DUAA data access

You have the right to request that we transfer your personal data to another organisation. Under DUAA, this can include certain derived or observed data (for example, credit performance or transaction history) in a secure, structured format.

7. Object to processing

You can object to our processing of your data — for example, for direct marketing or profiling purposes. To object, please contact Customer Services on 02920 548118 or raise your concerns via the ICO at <https://ico.org.uk/concerns/handling/>.

8. Automated decision-making and profiling

We use automated decision-making when assessing eligibility for our products. You have the right to understand the key factors that led to an automated decision and to request human review.

9. Contacting the Data Protection Officer (DPO)

Email: dpo@118118money.com

Post: The Data Protection Officer, 118 118 Money, 5th Floor, 1 Capital Quarter, Tyndall Street, Cardiff, CF10 4BZ.

We aim to respond to all rights requests within one month. If you're dissatisfied with our response, you may contact the Information Commissioner's Office (ICO).

10. Raising a complaint

If you need to raise a complaint which relates to how we have handled your personal data, you have the right to raise your concerns with the Information Commissioner's Office (ICO), who are the UK regulator for data protection.

They'll usually ask if you've tried to resolve the matter with us first, so please let them know about any steps you've already taken. If you do want to raise a complaint with the ICO, please note they recommend that you do so within three months of your last meaningful contact or a final response from us.

You can find out how to do this here: www.ico.org.uk/make-a-complaint or call them on 0303 123 1113 or write to them at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.