ScoresMatter Privacy Policy

BACKGROUND:

ScoresMatter Limited understands that your privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone who visits this website, www.scoresmatter.co.uk ("Our Site") and will only collect and use personal data in ways that are described here, and in a manner that is consistent with Our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of Our Privacy Policy is deemed to occur upon your first use of Our Site and You will be required to read and accept this Privacy Policy when signing up for an Account. If you do not accept and agree with this Privacy Policy, you must stop using Our Site immediately.

1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

"**Account**" means an account required to access and/or use certain areas and features of Our Site;
"**Cookie**" means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in section 13, below;
"**Personal data**" means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to Us via Our Site. This definition shall, where applicable, incorporate the definitions in the Data Protection Act 2018 and the Data Protection and Privacy Electronic Communications (EU Exit) Regulations 2019 collectively referred to in this document as the "**Data Protection Regulations**";
"**We/Us/Our**" means ScoresMatter Limited, a limited company registered in England under company number 07686022, whose registered address is, of Building 1, Chalfont Park, Gerrards Cross, Buckinghamshire, SL9 0BG; and

"UK" means the United Kingdom

2. Information About Us

2.1 Our Site is owned and operated by Us.
2.2 ScoresMatter is a trading name of ScoresMatter Limited.
2.3 Our Data Protection Officer can be contacted by email at manager@scoresmatter.co.uk, or by post. Please address postal correspondence to: The Data Protection Officer, ScoresMatter Limited, Building 1, Chalfont Park, Gerrards Cross, Bucks, SL9 0BG.
2.4 We trade in the UK to provide consumers with access to their credit reports, credit score and general credit information services as well as other data analysis and monitoring tools. We are authorised and regulated by the Financial Conduct Authority *only* for credit information service (i.e. providing you access to your credit report and score) and act as a credit broker and our Firm Reference Number is: 730722. We are also registered as an Account Information Services Provider, Firm Reference Number: 994744. You can check this on the Financial Conduct Authority website: https://register.fca.org.uk/s/.

2.5 We provide our credit information services in conjunction with TransUnion International UK Limited (referred to as 'TransUnion' in this document), which is the company that will be providing you with credit reporting services. TransUnion is one of the UK's leading credit reference agencies, its registered office is at One Park Lane, Leeds, West Yorkshire, LS3 1EP, registered number 3961870, it is also authorised and regulated by the Financial Conduct Authority - with the firm reference number 737740. TransUnion has its own Privacy Policy which is available here.
2.6 The Loan Affordability Assessment service is provided in conjunction with Consents Online Ltd and Equifax Limited, you can find their privacy policy of Consents Online here and Equifax here. Consents Online Ltd is a Registered Account Information Service Provider and is authorised and registered by the Financial Conduct Authority, its Firm Reference Number is: 792642.

2.7 The data for the Dark Web Scan is compiled by Acuris Risk Intelligence Limited, you can find their privacy policy here.

2.8 Our loan search facility is provided in conjunction with Aro Finance Limited, which is also a credit broker and is authorised and regulated by the Financial Conduct Authority (FRN: 662079) you can find their privacy policy here.

3. What Does This Policy Cover?

This Privacy Policy applies only to your use of Our Site. Our Site may contain links to other websites. Please note that We have no control over how your data is collected, stored, or used by other websites and We advise you to check the privacy policies of any such websites before providing any data to them.

4. Your Rights

4.1 As a data subject, you have the following rights under the Data Protection Regulations, which this Policy and Our use of personal data have been designed to uphold:

4.1.1 The right to be informed about Our collection and use of personal data;
4.1.2 The right of access to the personal data We hold about you (see section 12);
4.1.3 The right to rectification if any personal data We hold about you is inaccurate or incomplete (please contact Us using the details in section 14);
4.1.4 The right to be forgotten – i.e. the right to ask Us to delete any personal data We hold about you (We only hold your personal data for a limited time, as explained in section 6 but if you would like Us to delete it sooner, please contact Us using the details in section 14);
4.1.5 The right to restrict (i.e. prevent) the processing of your personal data;
4.1.6 The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);
4.1.7 The right to object to Us using your personal data for particular purposes; and
4.1.8 Rights with respect to automated decision making and profiling.

4.2 If you have any cause for complaint about Our use of your personal data, please contact Us using the details provided in section 14 and We will do Our best to solve the problem for you. If We are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office.

4.3 For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau.

5. What Data Do We Collect?

Depending upon your use of Our Site and/or our services, We may collect some or all of the following personal and non-personal data (please also see section 13 on Our use of Cookies and similar technologies and Our Cookie Policy):

5.1 name;
5.2 home address and residential status;
5.3 date of birth;
5.4 gender;
5.5 business/company name
5.6 job title/profession;
5.7 contact information such as email addresses and telephone numbers;
5.8 demographic information such as postcode, preferences and interests;
5.9 financial information such as credit / debit card numbers, bank name and account details;
5.10 income details;
5.11 IP address;
5.12 cookies and tracker information from your browser and/or device;
5.13 web browser type and version;
5.14 operating system;
5.15 a list of URLs starting with a referring site, your activity on Our Site, and the site you exit to;
5.16 details of your loan affordability assessment (but not your banking credentials)
5.17 your credit report, alerts and scores
5.18 details of your dark web scan
5.19 where you contact us by phone, email or post a record of that contact;
5.20 Where you contact us by phone we will retain a recording of that call;
5.21 payment and account usage history.

6. How Do We Use Your Data?

6.1 All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with Our obligations and safeguard your rights under the Data Protection Regulations at all times. For more details on security see section 7, below.
6.2 Our use of your personal data will always have a lawful basis, either because it is necessary for Our performance of a contract with you, because you have consented to Our use of your personal data (e.g. by subscribing to emails), or because it is in Our legitimate interests (see 6.8 below for more details on this). Specifically, We may use your data for the following purposes:

6.2.1 Providing and managing your Account;
6.2.2 Providing and managing your access to Our Site;
6.2.3 Personalising and tailoring your experience on Our Site;
6.2.4 Supplying Our services to you (please note that We require your personal data in order to enter into a contract with you);
6.2.5 For monitoring of calls made to and from customers to ensure that we are meeting the standards that we set;
6.2.6 to process and submit your request to TransUnion;
6.2.7 to help TransUnion to verify your identity in order to provide you with a copy of your credit file, credit score and/or other credit reporting information
6.2.8 to process and submit your request to Equifax Limited and Consents Online Ltd for them to then allow you to access your bank account transactions for the loan affordability tool;
6.2.9 to process and submit your request to Acuris Risk Intelligence Limited for your dark web report;
6.2.10 to process and submit your application for credit to Aro Finance Limited and present you with the credit offers;
6.2.11 for the preparation of your reports, scores and monitoring services;
6.2.12 personalising and tailoring Our services for you;
6.2.13 replying to emails from you;
6.2.14 supplying you with emails that you have opted into (you may unsubscribe or opt-out at any time by emailing us on contact@scoresmatter.co.uk, sending a message through the contact form in the customer dashboard or writing to us at our address set in 14 below);
6.2.15 market research (including reviews and surveys);
6.2.16 analysing your use of Our Site and gathering feedback to enable Us to continually improve Our Site and your user experience;
6.2.17 to manage your marketing preferences;
6.2.18 to manage your data processing preferences;
6.2.19 to compile anonymised data for analytical purposes.

6.3 With your permission and/or where permitted by law, We may also use your data for marketing purposes which may include contacting you by email, telephone, text message, and post with information, news and offers on Our products and/or services or those that you have shown an interest in. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that We fully protect your rights and comply with Our obligations under the Data Protection Regulations (as may be amended from time to time).

6.4 We may contact you via email to invite you to review any services and/or products you received from us in order to collect your feedback and improve our services ('the Purpose'). We may use an external company, such as Trustpilot A/S ("Trustpilot"), to collect your feedback which means that we will share your name, email address and reference number with Trustpilot for the Purpose. If you want to read more about how Trustpilot process your data, you can find their Privacy Policy here. We may also use such reviews in other promotional material and media for our advertising and promotional purposes.
6.5 Offers that we (or the third parties listed in 8.7.5 below) may send or refer you to will include information about our other products and services, offers from service providers that maybe the same or similar to what we provide, credit cards and loans (personal and short term), gaming, mobile phones, insurance, job boards and promotional offers such as free gifts, coupons and vouchers from retailers.
6.6 We will never share or sell your credit report, score and alert data, the results of any Dark Web Scan on your personal data, your loan affordability assessment results and/or financial health index to any third party for marketing purposes.
6.7 You have the right to withdraw your consent to Us using your personal data at any time, and to request that We delete it.
6.8 We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Data will therefore be retained for the following periods (or its retention will be determined on the following bases):

6.7.1 As a general rule, unless we have been requested to delete Your information, Customer personal data will be kept for the duration of the provision of the services and for a period of up to six years after the services have been terminated by You or Us. This is based upon the Limitation Act 1980 for the period in which someone can bring a breach of contract claim;
6.7.2 Where we have not provided You with any products or services (i.e. there has been no contract between You and Us), then we will keep your data for a period of two years.
6.7.3 We may keep data longer than stated in 6.7.1 and 6.7.2 where we are required to do so by law or a contractual obligation (such as complaints records for our Credit Report provider), or for the purpose of defending any legal action or complaint, however where we can we will anonymise such data so that it no longer identifies a living individual.
6.7.4 Call recordings are retained for a period of 2 years from the date that the call is made to our customer services team.

6.8 Legitimate Interest

6.8.1 Where we use legitimate interest for the basis of our processing of your personal data we shall ensure that we can demonstrate compelling legitimate grounds for the processing, which override the interests, rights and freedoms of the individual.
6.8.2 You have the right to object to our use of your personal data where we use legitimate interest as the basis of processing. You can do this by contacting us on the details in section 14.
6.8.3 Our legitimate interests include:

a) intra-group transfers;
b) the maintenance of our IT/Data Security systems and processes;
c) putting in place fraud prevention mechanisms;
d) keeping our records up to date;
e) working out which of our products and services may interest you and telling you about them (i.e. direct marketing);
f) developing products and services;
g) being efficient about how we fulfil our legal duties;
h) maintaining a marketing suppression list; and
i) complying with laws/regulations that apply to us.

7. How and Where Do We Store Your Data?

7.1 We only keep your personal data for as long as We need to in order to use it as described above in section 6, and/or for as long as We have your permission to keep it.
7.2 All our customer data is sorted and accessed from our servers which are based in Ireland.
7.3 However, some or all of your data may be stored/transferred outside of the UK. You are deemed to accept and agree to this by using Our Site and submitting information to Us. If We do store data outside the UK, We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and in compliance with the Data Protection Regulations including:

7.3.1 Carrying out due diligence on prospective parties to which we wish to transfer the data to;

7.3.2 Carrying out a risk assessment on the country to which we will transfer data to ensure that the protection offered to data subjects is equivalent to those provided in the UK, or accepted by the UK regulator as having adequate levels of protections (i.e. an adequacy decision exists)

7.3.3 Having in place written contracts on the transfer and use of the data (or using model contract clauses) that set out clearly the responsibilities of each party and the rights of data subjects;
7.3.4 Transferring data in an encrypted form or using a secure file transfer protocol; and /or
7.3.5 Limiting the transfer of data to only data that needs to be transferred to achieve the purpose.

7.4 Data security is very important to Us, and to protect your data We have taken suitable measures to safeguard and secure data collected through Our Site. Steps We take to secure and protect your data include:

7.4.1 using latest SSL technology to encrypt the transfer of any financial information, such as credit/debit card numbers;
7.4.2 data that is stored on ScoresMatter's servers is treated as proprietary and confidential and is not available to the public;
7.4.3 internal security policy with respect of the confidentiality of customer data allowing access only to those employees or third parties who have a need to know such information for the purpose of effectively delivering ScoresMatter services by means of user login and password requirements;
7.4.4 routinely evaluating our data security practices to identify security threats or opportunities for improvement.
Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Site; any transmission is at your own risk.

8. Do We Share Your Data?

8.1 We may share your data with other companies in Our group for reporting purposes and servicing your account. This includes Our holding company and its subsidiaries.
8.2 We may sometimes contract with third parties to supply services to you on Our behalf. These may include payment processing, search engine facilities, advertising, and marketing companies. In some cases, the third parties may require access to some or all of your data. Where any of your data is required for such a purpose, We will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, Our obligations, and the obligations of the third party under the law.
8.3 In order to provide you with our services (and comply with our contractual obligations) we may need to share some or all of your personal data with our service providers:

8.3.1 Alldigi Tech Limited- customers support services;
8.3.2 Bryton Interactive LLC- technology support services
8.3.3 TransUnion- credit report, credit score and credit alerts;
8.3.4 Callcredit Marketing Limited- analytics for marketing purposes;
8.3.5 Acuris Risk Intelligence Limited- the Dark Web report
8.3.6 Consents Online Ltd – loan affordability
8.3.7 Equifax Limited - loan affordability
8.3.8 Aro Finance Limited- credit broking
8.3.9 WebApps, LLC, - campaign management platform
8.3.10 Atlassian- project management platform
8.3.11 Amazon Web Services – hosting and server provider
8.3.12 Mailmaster (Scotland) Ltd – postal mailing services
8.3.13 SendGrid – emailing platform for sending email communications
8.3.14 Mandrill ® - emailing platform for sending email communications
8.3.15 TrustPilot A/S- customer feedback and reviews platform

8.4 We may compile statistics about the use of Our Site including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you. We may from time to time share such data with third parties such as prospective investors, affiliates, partners, and advertisers. Data will only be shared and used within the bounds of the law.
8.5 We may sometimes use third party data processors that are located outside of the UK. Where We transfer any personal data outside the UK, We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under the Data Protection Regulations including:

8.5.1 Carrying out due diligence on prospective parties to which we wish to transfer the data to;
8.5.2 Having in place written contracts on the transfer and use of the data (or using model contract clauses) that set out clearly the responsibilities of each party and the rights of data subjects; and/or
8.5.3 Transferring data in an encrypted form or using a secure file transfer protocol;
8.5.4 Limiting the scope of the data transfer to a 'need to know basis' only.

8.6 In certain circumstances, We may be legally required to share certain data held by Us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with legal requirements, a court order, or a governmental authority.
8.7 We may with your consent, or where it in our legitimate interest, also share some or all of your personal information with the following organisations:

8.7.1 Our sister company in the UK– Your Social Insights Limited
8.7.2 Our Parent Company- ScoresMatter, Inc, which is based in Atlanta, Georgia, USA
8.7.3 Our affiliated company- IMT Marketplace, LLC, which is based in Atlanta, Georgia, USA
8.7.4 Our technology service provider- Bryton Interactive LLC, which is based in Atlanta, Georgia, USA
8.7.5 Our third-party marketing partners (for marketing, and/or auditing, reporting and analytics connected to marketing) which include:

a) Cozi Ltd
b) D-L-U-K Limited
c) Facebook Ireland Limited (see 8.8 below for further details)
d) Nouveau Finance Limited
e) TFLI Limited
f) T Dot UK Limited
g) Stop and Go Network Limited
h) STS Commercial Limited

8.7.6 We may share your data with regulators and disputes resolution bodies such as:

a) The Financial Conduct Authority;
b) The Information Commissioner Office;
c) The Financial Ombudsman Service;
d) Advertising Standards Authority; and
e) Local Trading Standards;

8.7.7 A third party acting on your behalf, such as a financial or legal adviser;
8.7.8 Our payment processor when we are dealing with payment disputes
8.7.9 Our chargeback management providers Ethoca Inc and Verifi Inc when they notify us of a possible transaction dispute
8.7.10 With our third-party marketing partners when we are dealing with a complaint (see the list above)
8.7.11 Our service providers as listed in 8.3 and 8.5

8.8 We use the services of Facebook Ireland Limited (Facebook) to carry out certain marketing activities on the Facebook Platform. Specifically, from time to time we use Facebook's Audience Insights to help us to create targeted audiences for our advertising campaigns on Facebook. This involves sharing some of our customer personal data with Facebook to allow it to create for us information on the types of audiences (i.e. potential customers) on Facebook platform that would be best suited to see our adverts. In this respect Facebook acts as our joint processor.

For such processing of your personal data we and Facebook also act as a 'Joint Controller' this means that both Facebook and us can determine the reasons for processing of your personal data. Facebook has its own privacy policy on how Facebook processes personal data, including the legal basis which Facebook relies on and the ways to exercise Data Subject rights against Facebook. To review Facebook's privacy policy, you can visit: https://www.facebook.com/about/privacy. You can also obtain full contact details of Facebook or its representative and the details of its Data Protection Officer from this policy.

In order to ensure the rights of data subjects (i.e. you) we have entered into a Controller Addendum with Facebook that sets outs each parties' respective responsibilities in terms of this processing and our responsibility to inform you of the details in this section 8.8.

Any data subject requests with regard to the Personal Data stored by Facebook Ireland after the Joint Processing described in paragraph one of this section 8.8, is the responsibility of Facebook.

9. What Happens If Our Business Changes Hands?

9.1 We may, from time to time, expand or reduce Our business and this may involve the sale and/or the transfer of control of all or part of Our business. Any personal data that you have provided will, where it is relevant to any part of Our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use that data only for the same purposes for which it was originally collected by Us.
9.2 In the event that any of your data is to be transferred in such a manner, you will be contacted in advance and informed of the changes.

10. How Can You Control Your Data?

10.1 In addition to your rights under the Data Protection Regulations, set out in section 4, when you submit personal data via Our Site, you may be given options to restrict Our use of your data. In particular, We aim to give you control on Our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from Us which you may do by unsubscribing using the links provided in Our emails and at the point of providing your details).
10.2 You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service ("the TPS"), the Corporate Telephone Preference Service ("the CTPS"), and the Mailing Preference Service ("the MPS"). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

11. Your Right to Withhold Information

11.1 You may access Our Site without providing any data at all.

11.2 You may restrict Our use of Cookies. For more information, see section 13 and Our Cookie Policy.

12. How Can You Access Your Data?

You have the right to ask for a copy of any of your personal data held by Us (where such data is held). Under the Data Protection Regulations, no fee is payable and We will provide any and all information in response to your request free of charge. Please contact Us for more details at manager@scoresmatter.co.uk, or using the contact details below in section 14.

13. Our Use of Cookies

Our Site may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by Us and are used only by Us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve services. In addition, Our Site uses analytics services provided by Google Analytics. Website analytics refers to a set of tools used to collect and analyse usage statistics, enabling Us to better understand how people use Our Site. For more details, please refer to Our Cookie Policy.

14. Contacting Us

If you have any questions about Our Site or this Privacy Policy, please contact Us by email at manager@scoresmatter.co.uk, or by post at ScoresMatter, Building 1, Chalfont Park, Gerrards Cross, Buckinghamshire, SL9 0BG. Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you (as under section 12, above).

15. Changes to Our Privacy Policy

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.

Last reviewed - September 2024