



Privacy & Cookie Policy

For the purposes of the Data Protection Act and UK GDPR referred to herein as The Data Protection Act (**the “DPA”**), we are the ‘Data Controller’ (i.e. the company who is responsible for, and controls the processing of, your personal data).

Our group of companies and trading styles are as follows;

- **Parent Company** - Pennine Ventures Limited – (09400764) – Data Controller Reg. ZA120006
- **@GoSimpleTax Limited** [t/as ‘@GoSimpleTax’, ‘Landlord Calculator’, ‘Salary Calculator Pro’] (Company No. 08793323) – Data Controller Reg. ZA770578
- **Coconut Platform Limited** [t/as ‘Coconut’, ‘Get Coconut’] – (Company No. 09904418) – Data Controller Reg. ZB804847
- **MyRegData Limited** – (Company No. 10106330) – Data Controller Reg. ZB343355
- **Liquid Accounts Limited** – (Company No. 05405880) – Data Controller Reg. ZB343358
- **Equa Via Systems Limited** [t/as Pastel UK & Ireland] – (Company No. 04701502) – Data Controller Reg. ZB343353
- **MyPAYE Limited** – (Company No. 08238799) – Data Controller Reg. Z3419092

The aforementioned limited entities, company names and trading styles will be referred to herein as ‘**we**’, ‘**us**’ or ‘**our**’.

Our group of companies and trading styles provide financial technology services, whose registered address is; 5 Cromwell Court, Oldham, OL1 1ET. We take the privacy of our customers very seriously. We ask that you read this Privacy Policy (**‘the Policy’**) carefully as it contains important information about how we will use your personal data.

This Policy was last updated October 2024 as a result of the changes in our group structure by the acquisition of other firms and as a result, to meet the lawful requirements set out by the Data Protection Act and the UK GDPR.

Personal data we may collect and use

We collect personal information when you register on the website(s) and when you use the services or contact our support teams. All contact by telephone, email or by any other means is stored either by the carefully selected third-party service providers, for the sole purpose of providing certain services to us. Any third-party service provider engaged, particularly those whom your data is shared with, have the necessary due diligence checks undertaken to ensure they conduct their activities in a sound and proper fashion. They will also have a data processor agreement in place, stating specifically how your data is to be processed. All third-parties engaged will also have the relevant technical and security safeguards in place to protect the integrity of your data. The third-parties engaged to assist us in these matters include software to analyse customer usage patterns, customer relationship management software, email marketing software and other communication tools.

Your information will only be used by us in order to provide you with access to our products, services and information that we believe may be of interest you. We may contact you from time to time to provide you with such information, either using our own software or third-party communication tools. Your information will continue to be held and used by us to contact you in such a way after you cease using our services, but you may unsubscribe from such communications. Your personal details will never be



passed on, or sold on as marketing lists, to any other companies or third-parties including affiliates (other than the third-party service providers described above) and will never be added to any third-party mailing lists or databases, unless you opt-in to do so. By using the services, you do so in the acknowledgement of your personal information being collected, held and used in this way.

HMRC passwords, ID numbers, or other special access features which you provide to us are stored locally and are deleted as soon as the tax return is submitted. There are other types of data that we process, such as personal information is information you provide to us which personally identifies you including your name, address and e-mail address, National Insurance Number, Unique Taxpayer Reference (UTR) etc.

We may also use information about our users in statistical aggregate form. This is non-personal information and simply refers to information such as the number of registrations, traffic patterns and Website user trends.

Through your use of the services, we may also collect information about someone else from you. If you provide us with personal information about someone else you must ensure that you are authorised to disclose that information to us, in compliance with data protection or privacy laws. We may collect, use and disclose such information for the purposes described this Policy.

This means that you must take reasonable steps to ensure the individual concerned is aware of and/or consents to the various matters detailed in this Policy, including the fact that their personal information is being collected, the purposes for which that information is being collected, the intended recipients of that information, the individual's right to obtain access to that personal information, our identity and how to contact us.

Once you are fully engaged with the use of our services and digital transactions have been made with other authorities, for example, the HMRC, we will keep your personal information in line with the relevant retention period based on the services for which you are engaged with. We will only retain your data for as long as there is a legitimate use for doing so. We have a duty through reporting to governmental authorities, as well as legal requirements defined by our regulators, to retain your data for a specified period of time when you engage in the use of our services. If you wish to find out more about this, or how our defined retention period affects you and the data we hold about you, please contact our Data Protection Officer by Email on compliance@pennineventures.co.uk.

We will use the personal data you disclose to us for the purposes described in Our Terms. These purposes include:

- to assist us in processing your enquiries and obtaining the services which you require;
- to help us identify you and any accounts that you hold with us;
- administration;
- research, statistical analysis and behavioural analysis;
- customer profiling and analysing your preferences;
- marketing (providing you have opted-in) [for further information see 'Marketing and opting-in' below];
- fraud prevention and detection;
- billing and order fulfilment;
- customising our website and its content to your particular preferences;
- to notify you of any changes to our website or to our services which may affect you;
- security vetting; and
- Improving our services.



Marketing and opting-in

We may share your personal data with organisations as set out in the 'Disclosure of personal data' section below. If you have opted-in to receive our marketing material, we will ensure that it is to your requirements and *granular*. We may contact you (unless you have asked us not to do so) by mail, telephone, text message, email, (each contact method requires its own consent via an opt-in selection) The nature of these marketing communications relate to information on products, services, promotions and special offers which we believe may be of interest to you. If you would prefer not to receive any further direct marketing communications from us, it is possible to opt out at any time. See further 'Your rights' below.

Disclosure of personal data

When acting as financial services technology provide, there is a reasonable expectation for us to share your personal data with other organisations.

We may disclose personal data which you provide to us to:

- Our agents and service providers (e.g. providers of web hosting, maintenance services etc);
- Through offering products and services and the implementation of, and assisting with, services that
- Law enforcement agencies in connection with any investigation to help prevent unlawful activity;
- Our business partners in accordance with the 'Marketing and opting-in' section above, specifically being:
 - our group companies (as defined in the Companies Act 2006);
 - financial services and technology provider companies with whom we deal for the purposes of providing our services to you, and;
 - other third parties with whom we deal with in the course of providing our services to you; and
- Any regulators within whose jurisdiction we operate within.

Keeping data secure

We currently safeguard personal data by storing it on a CRM protected by password and shall ensure that we adopt the use of sufficient technical and organisational measures to safeguard personal data which is disclosed to us. Whilst we will use all reasonable efforts to safeguard such personal data, you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal data which are transferred from you or to you via the internet.

Monitoring

We may monitor and record communications with you (such as telephone conversations and emails) for the purpose of quality assurance, training, fraud prevention, compliance or commercial purposes.



Information about other individuals

If you give us information about others, you confirm that the other third-party person has appointed you to act on his/her behalf. This is also relevant where others are concerned if you indeed ask another person to act on your behalf as a third-party.

Under the third-party authorisation, the other person can:

- Give consent on his/her behalf to the processing of his or her personal data for the purposes and reasons set out in this Policy; and
- Receive on his/her behalf any data protection notices.

Such authorisation will remain in place until this has been revoked, either by verbal or written communication.

Use of Google Analytics Advertising

We use Google Analytics Advertising Features ('GAAF') through our website, which means that certain information about the traffic on our website is collected. In light of using GAAF, we will not facilitate the merging of personally-identifiable information with non-personally identifiable information collected through GAAF unless we receive your express consent to that merger.

Cookies

In common with many other website operators, we use standard technology called 'cookies' on our website. Cookies are small pieces of information that are stored by your browser on your computer's hard drive and they are used to record how you navigate this website on each visit.

Your rights

Based on the lawful bases with which we process your personal data, you as the data subject are provided with certain rights (below) however, based on the level of which your data is processed, certain individual rights may not always be possible;

Right to object

Individuals can object to the processing of their data based on legitimate interest, but this is not an absolute right.

Right to restrict processing

Individuals can request that their personal data be restricted or suppressed.

Right to expect transparency

Individuals should be informed of their rights and how to exercise them.

Right to expect reasonable expectations

Individuals can expect that their personal data will not be processed in ways that they would not reasonably expect.

Right to expect a balancing test

If an individual objects, the organisation must demonstrate compelling legitimate grounds to continue processing.

Right to expect regular review

The organisation should regularly review their legitimate interest assessment (LIA) and refresh it if necessary.



Right to expect compliance with other legal requirements

The organisation must comply with other legal requirements, such as the PECR.

You have the right to request access to your personal data which we process. This formal request is made under the DPA and is referred to as a Subject Access Request. This request will be free-of-charge (unless *manifestly excessive*) and provided to you within thirty days of making the request, save exceptional circumstances. If you wish to exercise this right and make a Subject Access Request, you should;

- Put your request in writing; either by Email or by letter.
- Include proof of your identity and address (e.g. a copy of your driving licence or passport, and a recent utility or credit card bill);
- Specify the personal data you want access to, including any account or reference numbers where applicable.

You have the right to require us to correct any inaccuracies in your data free of charge. If you wish to exercise this right, you should:

- Either speak to us via telephone or put your request in writing;
- Provide us with enough information to identify you (e.g. account/order number, username, registration details); and
- Specify the information that is incorrect and what it should be replaced with.

You also have the right to ask us to stop processing your personal data for direct marketing purposes. If you wish to exercise this right you should:

- put your request in writing (an email sent to compliance@pennineventures.co.uk with a header that says 'unsubscribe' is acceptable);
- provide us with enough information to identify you (e.g. account/order number, username, registration details);
- if your objection is not to direct marketing in general, but to direct marketing by a particular channel (e.g. email or telephone) please specify the channel you are objecting to.

Lawful basis for processing your data

Our lawful basis for processing your personal data is done so under a *Legitimate Interest - Article 6(1)(f)* – “*the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual’s personal data which overrides those legitimate interests.*”

The Legitimate Interest relates to legal requirements for us to hold your personal data and financial information on record for up to a total of six years from the end date of your credit agreement. This six-year period satisfies the requirement of our regulator, The Financial Conduct Authority. Additionally, there is also a legal requirement to hold accounting information with Her Majesty’s Revenue & Customs (HMRC). This is in line with other financial industry retention periods. Please also refer to a separate document - “*Legitimate Interest Assessment*” which can be provided to you by requesting it from us.

Data Retention

The retention period for your personal data will be up to a total of six years from the end data of the credit agreement. If you do not proceed with an enquiry for finance, or, you do not obtain a finance agreement under which we have arranged for you with our panel of lenders, your personal data is likely to be subject to a shorter retention period and in line with *Article 5(1)(c)* of the UK GDPR – “*adequate,*



relevant and limited to what is necessary in relation to the purposes for which they are processed (“data minimisation”).”

International Transfers

In the normal course of business there may be a need for us to transfer personal data outside of the European Economic Area (EEA) where those countries do not typically have the same protections and safeguards in place for the protection of personal data to those countries within the EEA.

In situations where this may need to be done, assurances and processes will always be put in place and considered before any international transfer to a non-EEA country is undertaken to ensure the protection and security of the personal data, ensuring that the recipient organisation has the necessary technical and organisational security requirements to protect the integrity of your personal data.

How to contact us about your personal data or this privacy policy

If you have any questions about this privacy policy or about your personal data, please contact us by using the following details

Data Protection Officer,
Pennine Ventures Limited,
5 Cromwell Court,
Oldham,
Manchester,
OL1 1ET

Email: compliance@pennineventures.co.uk

Tel: 0161 413 5050

Where to make a complaint

If you have a complaint regarding any aspect of your personal data or this privacy policy, please write to us at the above address. If you are still not satisfied with the outcome of your complaint, you may write to the Information Commissioner’s Office at the following address:

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

You can also contact the Information Commissioner’s Office using their online form: <https://ico.org.uk/global/contact-us/email/>

Changes to this privacy policy

We aim to meet high standards and so our policies and procedures are constantly under review. From time to time we may change this privacy policy. Accordingly, we recommend that you check this page periodically in order to review the latest version.