## NGM Money Matters customer privacy notice

This privacy notice tells you what to expect us to do with your personal information.

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## Contact details

### Post

3 Tesyn Close, BODMIN, Cornwall, PL31 2TL, GB

### Telephone

07503165403

### Email

natalie@ngmmoneymatters.com

## What information we collect, use, and why

We collect or use the following information to **provide and improve products and services for clients**:

* Names and contact details
* Addresses
* Gender
* Pronoun preferences
* Occupation
* Date of birth
* Payment details (including card or bank information for transfers and direct debits)
* Financial data (including income and expenditure)
* Transaction data (including details about payments to and from you and details of products and services you have purchased)
* Employment details (including salary, sick pay and length of service)
* Credit history and credit reference information
* Criminal records data (including driving or other convictions)
* Information relating to compliments or complaints
* Account access information
* Website user information

We collect or use the following personal information for the **operation of client or customer accounts**:

* Names and contact details
* Addresses
* Purchase or service history
* Account information, including registration details
* Information used for security purposes

We collect or use the following personal information **for the prevention, detection, investigation or prosecution of crimes**:

* Names and contact information
* Client accounts and records
* Financial information eg for fraud prevention or detection
* Location data

We also collect or use the following special category information **for the prevention, detection, investigation or prosecution of crimes.** This information is subject to additional protection due to its sensitive nature:

We collect or use the following personal information to **comply with legal requirements**:

* Name
* Contact information
* Identification documents
* Client account information
* Health and safety information
* Any other personal information required to comply with legal obligations
* Safeguarding information
* Criminal offence data

We also collect or use the following special category information to **comply with legal requirements.** This information is subject to additional protection due to its sensitive nature:

We collect or use the following personal information to **protect client welfare**:

* Names and contact information
* Client account information

We collect or use the following personal information for **dealing with queries, complaints or claims**:

* Names and contact details
* Addresses
* Payment details
* Account information
* Purchase or service history
* Relevant information from previous investigations
* Customer or client accounts and records
* Financial transaction information
* Correspondence

## Lawful bases and data protection rights

Under UK data protection law, we must have a “lawful basis” for collecting and using your personal information. There is a list of possible [lawful bases](https://ico.org.uk/for-organisations/advice-for-small-organisations/getting-started-with-gdpr/data-protection-principles-definitions-and-key-terms/#lawfulbasis) in the UK GDPR. You can find out more about lawful bases on the ICO’s website.

Which lawful basis we rely on may affect your data protection rights which are set out in brief below. You can find out more about your data protection rights and the exemptions which may apply on the ICO’s website:

* **Your right of access** - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. [Read more about the right of access](https://ico.org.uk/for-organisations/advice-for-small-organisations/privacy-notices-and-cookies/create-your-own-privacy-notice/your-data-protection-rights/#roa).
* **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. [Read more about the right to rectification](https://ico.org.uk/for-organisations/advice-for-small-organisations/privacy-notices-and-cookies/create-your-own-privacy-notice/your-data-protection-rights/#rtr).
* **Your right to erasure** - You have the right to ask us to delete your personal information. [Read more about the right to erasure](https://ico.org.uk/for-organisations/advice-for-small-organisations/privacy-notices-and-cookies/create-your-own-privacy-notice/your-data-protection-rights/#rte).
* **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information. [Read more about the right to restriction of processing](https://ico.org.uk/for-organisations/advice-for-small-organisations/privacy-notices-and-cookies/create-your-own-privacy-notice/your-data-protection-rights/#rtrop).
* **Your right to object to processing** - You have the right to object to the processing of your personal data. [Read more about the right to object to processing](https://ico.org.uk/for-organisations/advice-for-small-organisations/privacy-notices-and-cookies/create-your-own-privacy-notice/your-data-protection-rights/#rto).
* **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. [Read more about the right to data portability](https://ico.org.uk/for-organisations/advice-for-small-organisations/privacy-notices-and-cookies/create-your-own-privacy-notice/your-data-protection-rights/#rtdp).
* **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time. [Read more about the right to withdraw consent](https://ico.org.uk/for-organisations/advice-for-small-organisations/privacy-notices-and-cookies/create-your-own-privacy-notice/your-data-protection-rights/#rtwc).

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

### Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information to **provide and improve products and services for clients** are:

* Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
* Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
* Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Our lawful bases for collecting or using personal information for the **operation of client or customer accounts** are:

* Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
* Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
* Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Our lawful bases for collecting or using personal information **for the prevention, detection, investigation or prosecution of crimes** are:

* Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
* Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
* Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Our lawful bases for collecting or using personal information to **comply with legal requirements**:

* Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
* Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
* Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Our lawful bases for collecting or using personal information to **protect client welfare** are:

* Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
* Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
* Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Our lawful bases for collecting or using personal information for **dealing with queries, complaints or claims** are:

* Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
* Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
* Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

## Where we get personal information from

* Directly from you
* Regulatory authorities
* Legal bodies or professionals (such as courts or solicitors)
* Credit reference agencies
* Suppliers and service providers

## How long we keep information

## We will only retain your personal data for as long as is necessary to fulfill the purposes for which it is collected.

When assessing what retention period is appropriate for your personal data we take into consideration:

* The requirements of our business and the services provided
* Any statutory or legal obligations
* The purposes for which we originally collected the personal data
* The lawful grounds on which we based our processing
* The types of personal data we have collected
* The amount and categories of your personal data
* Whether the purpose of the processing could reasonably be fulfilled by other means

## Who we share information with

### Others we share personal information with

* Other financial or fraud investigation authorities
* Regulatory authorities
* External auditors
* Organisations we’re legally obliged to share personal information with
* Third parties:
  + IT and cloud services, professional advisory services, administration services, marketing services, and banking services

## How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we’ve used your data after raising a complaint with us, you can also complain to the ICO.

The ICO’s address:

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

Helpline number: 0303 123 1113

Website: [https://www.ico.org.uk/make-a-complaint](https://ico.org.uk/make-a-complaint/)

## Last updated: 19 August 2025