

# Privacy policy

## Last Updated: 10 April 2017

This Privacy Policy became effective on 10 April 2017. You can find the most recent prior version of the Privacy Policy [here](#).

We may update this policy from time to time. Please check this page regularly for notification of any significant changes in the way we treat your personal information. We will try to provide Consumers with reasonable advance notice of any proposed changes.

Where the words 'GoCardless', 'we', 'us' or 'our' are used in this document, they are all references to GoCardless Limited.

Your privacy is very important to us. We have put in place measures to ensure that any personal information or data that we obtain from you is processed in accordance with the accepted principles of good information handling.

We deal with those who are using GoCardless in relation to their business, such as suppliers wanting to enable consumers to pay GoCardless by direct debit. Some of those suppliers are parties to agreements with us which may change some of their rights.

## What this privacy policy covers

This policy gives you information about how we treat personal information received from our website visitors.

## What is personal information?

Personal information is defined as information that may be used to identify a living individual, such as their title, name, address, email address and phone number.

## Information collection and use

When you visit our website, we may automatically collect certain system-related information about your visit, and we also use 'cookies' to provide you with access to certain private areas of the website. See the 'Cookies' section below for further information.

We, our agents, subcontractors and finance partners (if any), may collect and process the following data about you:

- if you apply to use GoCardless, we will use your details to facilitate your application and future transactions; information that you provide by filling in forms on our website [gocardless.com](https://gocardless.com) (the "Website"). This includes information provided at the time of registering to use the Website, subscribing to our service, posting material or requesting further services. We may also ask you for information when you report a problem with our site;

if you call us or send us an enquiry or details via email or another method including 'contact us' for assistance, we will use your details to respond to any request/comment you have. We may also keep these details for the purpose of evaluating and assessing applications, performing contracts and technical administration;

- we may also ask you to complete surveys that we use for research purposes, (i.e. to create statistics), although you do not have to respond to them;
- details of transactions you carry out through the Website;
- details of your visits to the Website and the resources that you access;
- details which help us to prevent and detect debt, fraud or loss;
- details which help to train our staff and improve our systems;
- details required to comply with the requirements of supervisory organisations, such as the Financial Conduct Authority and relevant industry bodies;
- details which our finance provider and/or credit reference agencies may use to check your details with one or more credit-reference and fraud-prevention agencies to help them to make decisions about your ability to make payments;
- where you are using the system to make payments, we may share your information with the party you wish to receive funds, and any partner organisation which is facilitating the transaction;
- where you are using the system to receive payments, we may share your information with each person wishing to make payments to you, and any partner organisations which are facilitating transactions;
- to ensure that content from the Website is presented in the most effective manner;
- to provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes;
- to carry out our obligations arising from any contracts entered into between you and us;
- to allow you to participate in interactive features of our service, when you choose to do so; and
- to notify you about changes to our service.

You have the right to request a copy of the personal information we hold about you, its origin and any recipients of it as well as the purpose of any data processing carried out. Please note that, in accordance with the Data Protection Act 1998, we reserve the right to charge a £10 admin fee. We may also forward your request to our data controller. For further information, please contact us by emailing [help@gocardless.com](mailto:help@gocardless.com) with the subject 'Data subject access request'.

In accordance with the Data Protection Act 1998, you have the right to correct, restrict our use of or ask us to delete your personal information. Use the details on the 'Contact Us' to ask any questions or request the correction, restriction or deletion of your personal information.

The Website may, from time to time, contain links to other websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

We do not disclose information about identifiable individuals to our advertisers, but we may provide them with aggregated information about our users (for example, we may inform them that 500 males aged under 30 have clicked on their advertisement on any given day). We may also use such aggregated information to help advertisers reach the kind of audience they want to target.

Telephone calls may be recorded for security and regulatory purposes and may be monitored under our quality control procedures.

Where you are applying to use the GoCardless system, we may also contact credit or identity reference agencies with information you provide to enable us to confirm your identity.

If you send us your CV we may want to keep your details on file in case an opportunity comes up in the future. If you'd rather we didn't do this, please let us know as soon as possible by emailing [help@gocardless.com](mailto:help@gocardless.com) and we will delete your record as soon as we are able.

The only time we will use your details for any other purpose than those listed above is to provide you with details from time to time about our services. However we will only do this if either (i) you have given us permission to do so, or (ii) you are one of our customers and we are telling you about similar products and services to the ones you have previously purchased or asked us about. In each case you can contact us to opt out of any further marketing communications.

We may pass your personal information to our subcontractors to enable them to provide services for us but for no other purpose. We respect your privacy and will not rent, sell or share personal information about you with other people or non-affiliated companies without your express permission.

## **Where we store your personal data**

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data,

you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of the Website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do all that we reasonably can to protect your personal data, we cannot guarantee the security of your data transmitted to the Website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## Disclosure of your information

We may disclose your personal information to third parties if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Terms and Conditions [\[link\]](#) and/or other agreements entered into with you; or to protect the rights, property, or safety of GoCardless Limited, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

## Cookies

We may collect information about your computer, including your IP address, operating system and browser type, for system administration and to report aggregated information to our advertisers. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

We may collect information about your use of our website, such as pages visited, links clicked, non-sensitive text entered, and mouse movements. We do this via a cloud-based application provided by FullStory, Inc., (the "FullStory Service") that utilises a script to enable us to record your session on our website and watch a DVR-like video playback of that. Our purpose in collecting this information is to better understand how GoCardless' visitors use our website and to identify any usability problems, so that we may make the necessary improvements to enhance our visitors' experience in the future. When we collect this information, your identity will remain anonymous and we do not use this information to identify you.

If you wish to prevent GoCardless from recording your session on our website, you can opt-out of the FullStory Service by clicking here [\[Insert Link\]](#). Opting out will create a cookie that tells FullStory Inc. to turn off recording on any website that uses the FullStory Service, including GoCardless' website. The presence of this cookie is required to continue opting out, so if you clear your browser cookies, you will have to opt-out again, by clicking the link above or opting-out directly on the FullStory website.

We may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to improve the Website and to deliver a better and more personalised service. They enable us:

- to estimate our audience size and usage pattern;
- to store information about your preferences, and so allow us to customise our site according to your individual interests;
- to speed up your searches; and
- to recognise you when you return to our site.

Most web browsers offer users controls, to give you the option to delete or disable cookies. You can usually find out how to do so by referring to the 'Help' option on the menu bar of your browser, or by visiting the browser developer's website. This will usually tell you how to prevent your browser from accepting new cookies; notify you when you receive new cookies; and disable cookies altogether. Please note that disabling cookies will stop you accessing private areas of the website.