



Chorus TM

At Chorus TM we take your privacy seriously. Read our policy to find out how we use your personal details and keep it safe.

Who are we?

Chorus TM Ltd, 4th Floor, Elsley Court, 20-22 Great Titchfield Street, London W1W 8BE registered in England & Wales No. 14739413.

What personal information do we collect?

Most personal data is collected directly through the application process. The sources of any personal data collected indirectly will be mentioned in this statement. Whether or not you become a customer, we may ask you for (but not limited to) your: title, name, nationality, current address, date of birth, email address, mobile phone number, home phone number, personal data about other cardholders.

You must have the authority of other Directors, shareholders and cardholders to provide their personal data to us and share this privacy policy with them beforehand. You are free to withdraw your consent at any time. This may result in us not being able to do certain things for you.

How do we use your information?

The way we collect and use data is always lawful. We use your personal data to provide information on the services you have requested or products you have ordered.

Data is collected and used on a lawful basis where our interests do not outweigh your interests which is outlined below.

We use your data to:

Provide our products and services to you under contract. We:

- Take steps prior to entering into a contract.
- Decide whether to enter a contract.
- Manage and perform a contract.
- Make sure our records are up to date.

Fulfil our legal obligations:

- When you exercise your rights under GDPR (General Data Protection Regulation) and make requests.
- For compliance with legal and regulatory requirements, and related disclosures.
- For the establishment and defence of legal rights.
- For activities relating to the prevention, detection and investigation of crime.
- To verify your identity and prevent fraud and money laundering, including sharing the data we have collected from you with fraud prevention agencies. By law, we are required to review transactions and report any which may be suspected of being related to money laundering activities.
- To monitor communications (emails, calls and other) and activities on your account.

Carry out our legitimate interests, without acting against your privacy rights:

- For good governance, accounting, managing and auditing our business.
- For market research, analysis and developing statistics.
- To detect, prevent and investigate fraud, money laundering and other crimes and to verify your identity in order to protect our business.

With your consent, we:

- Send you marketing communications.
- Disclose your personal data to other people or organisations when you ask us to.
- Process any special categories of personal data at your request.
- Provide cookie information. To find out more about how and why our website uses cookies, please read our [Cookie Policy](#)

How long do we hold on to your information?

We keep your data whether you become a Chorus TM customer or not:

- For as long as it takes to deal with your query
- For as long as you might legally bring a claim against us
- After your account has been closed or otherwise come to an end based on our legal and regulatory requirements

What are your rights?

Under GDPR (General Data Protection Regulation), you have:

- The right to be informed
- The right of access

- The right of rectification
- The right of erasure
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling

If you would like further information about data protection you can visit the Information Commissioner's Office (ICO) at ico.org.uk. The ICO is the UK's independent authority set up to uphold information rights in the public interest and data privacy for individuals. We comply with all ICO regulatory and statutory requirements. You have the right to make a complaint to the ICO regarding the handling of your data.

Fraud prevention and money laundering checks

We may use your personal details in order to conduct identity checks as required by law as a measure to prevent money laundering.

The personal data we have collected from you at application or any stage may be shared with fraud prevention agencies. We are required by law to review transactions and report any which may be suspected of being related to money laundering activities.

Automated decision making

We may process your personal data without human intervention to evaluate your personal situation, such as transactional history and account-opening anniversary events. We may do this to decide what marketing communications might be suitable for you, to analyse statistics and to assess risks.

This is all done on the basis of our 'legitimate interests', to protect our business, and

to develop and improve our products and services. If we use automated decision making including profiling activity to assess your application, this will be performed on the basis of it being necessary to perform the contract.

Sharing your information

We will not sell, share, or rent your information to others except as set out in this policy.

We may share your information with:

- Organisations that provide operational services relating to the performance of the Chorus TM cards or services that you use. Our strategic partners are, where required by law, authorised and regulated to the required standards.
- Suppliers, such as card producers, when it is necessary in order to fulfil our obligations to you in setting up and maintaining your account.
- The purchaser of the company or the purchaser of its assets in the event of the sale of the company or its assets.

While our website may contain links to other sites, we are not responsible for their privacy practices or content.

Merchants

We won't provide your details to third parties, such as sellers who accept payment from you using your Chorus TM card. We have no responsibility or liability for their practices.

When we collect information (e.g. on hobbies and lifestyle) from competitions, we won't share this with sellers, however we may occasionally share unidentifiable, aggregate data.

Transferring your information overseas

We might transfer your personal data outside of the UK and EEA (European Economic Area). In this event, we will always take all necessary steps to ensure the data is held securely and processed in line with applicable laws to the UK.

Opting out of marketing preferences

You are free to opt out of receiving all marketing communications from us and our strategic partners at any time by contacting us or logging into your online account.

Should you be opted in to receive email correspondence, there is an unsubscribe link in each email we send out, if you use this, we will not send any unsolicited mail to your registered email address.

Communications regarding changes to existing products or services held, our terms, conditions and policies are important and sometimes critical. You may not opt out of receiving these communications.

Use of cookies

Our website uses cookies. A cookie is a piece of data stored on your computer's hard drive that identifies your computer while you are using our site. Once you shut down your browser software, the cookie simply terminates until you re-enter the site.

Cookies have a number of uses. For example, cookies are part of the mechanism that allows you to sign in and out of our website rather than having to enter your password repeatedly during a session. Cookies can be used for analytics purposes to estimate the number of users to our site. Once you are logged in, cookies can be used to enable us to track and target your interests to enhance your experience on our site. They may also be used for other purposes, such as to maintain the security of the site and provide information on what we need to do to provide administration

support to the site. Some of our strategic partners use cookies on our site (for example, advertisers). However, we have no access to or control over these cookies.

We provide specific details about the cookies we use and the reasons for using these cookies in our [Cookie Policy](#) to enable site visitors to make an informed decision and thus provide informed consent.

Reviewing, correcting or updating your personal data

If any of your details are recorded incorrectly and need to be changed, please contact our Support Team powered by Equals Money on +44 (0) 330 828 5822 with details of the required changes and the reasons for the change. Proof of change of address may be needed.

Customer Services opening times:

Monday to Friday 08.30am – 17:00pm

Alternatively you can write to the Data Protection Officer (DPO) regarding accessing your personal data or any part of this privacy policy by writing to Chorus TM, c/o Equals Money, Vintners Place, 68 Upper Thames Street, London, EC4V 3BJ or emailing info@chorus-tm.com.

If we make any changes to our privacy policy, we will notify you by email to your registered email address so you will always know what information we collect, how we use it and under what circumstances, if any, we disclose your personal data.

If we want to change the use of personal information we have already collected about you, we will notify you by email. If you have not provided us with your email address you must regularly check the website for an up to date version of the privacy policy. It is then up to you to decide whether you will let us use your information in this way. We will use information in accordance with the most recently published privacy policy.

