

# **Privacy Policy**

## Your right to privacy

Your right to privacy is important to us. We take the security of your information seriously and have policies and processes in place to ensure it remains safe.

This notice describes the way we collect information, how we use it and how we protect it.

#### Who we are?

We are WorivoInfotech PVT LTD, a data controller. Leading Views is a trading name of WorivoInfotech PVT LTD, our company registration number U72900WB2021PTC246477, ICO registration No ZB133474 and registered company address at 28, DPS Road Tollygunge Kolkata-700033, India, you can find our website at: www.worivoinfotech.com

Because we are based outside the United Kingdom / European Union, we have appointed Data Rep Service office as our local representative.

Our Data Protection Officer is Kieran Mcgeehan and you can contact him by telephone on +4401332720078 or email at: worivoinfotech@datarepservice.com

# How we comply with data protection regulations?

We are committed to safeguarding your personal information and we are legally obliged to use your information in line with all laws concerning the protection of personal information.

# What do we use your data for?

All of the data we collect from you is for direct marketing purposes. This means we share your details with reputable companies who may want to contact you by telephone to offer you goods and services that may be of benefit to you. You can ask us to stop sharing your details at any time now or in the future. Our brands Leading Views may also contact you by email, SMS or telephone to ask you questions for marketing purposes. These questions will be on behalf of companies who we will name at the time of the call and who will only contact you if consent is provided. Again, you can ask Leading Views to stop contacting you now or at any time in the future. The number to call to do so is +44 2033933570 or you can email us at <a href="mailto:compliance@worivoinfotech.com">compliance@worivoinfotech.com</a>

We may use your information to:

- Communicate with you;
- Keep our records up to date
- Process payments;
- For the investigation of or prevention of crime;

- For research and statistical purposes;
- To disclose to regulatory bodies for the purposes of monitoring and/or enforcing our compliance with their requirements;
- Process job applications;
- Gain feedback from you;
- Prevent crime and meet our legal obligations;
- Prudentially manage our business using models and forecasts;
- Keep you informed of other relevant products or services that may be of interest to you where you have provided consent for us to do this.

The lawful bases that we rely on for processing your information are:

- Your consent, which you can remove at any time;
- Ye have a contractual obligation;
- Y We have a legal obligation;
- Y We have a vital interest:
- We need it to perform a public task; or
- Ye have a legitimate interest.

We may also monitor and keep records of email communications which you send to us and other communications with you in accordance with this policy and our other business interests.

We may also receive personal information indirectly, when such information is provided to us by our clients. Information needed to provide you with a product or service, to satisfy legal or regulatory requirements, or where we have your consent. We may use your data for the following purposes:

- Conducting surveys we may contact you by email, SMS, or telephone to carry out surveys and then share your details with selected companies who want to contact you for the purposes of marketing.
- Direct Marketing we may contact you by email, SMS, or telephone for the purposes of marketing.
- Profiling we may profile your information to help our clients deliver marketing communication that is more relevant to you. We will never make automated decisions about you which would have a negative impact on your rights, and you have the right to request that this is stopped at any time using the contact information.

### **Legitimate Interest**

Data may be processed in pursuance of legitimate interests. This includes using your data for postal and telephone marketing for ourselves or other but in either case communications will be in relation to products or services which we believe may be of interest to you based upon information which you have provided us. It also includes processing your data for ID protection and tracing purposes such as Credit Reference and Fraud Prevention. This is in relation to appropriate agencies which we have listed below which could help protect your identity and prevent frauds. As with all of your data you can also object to us processing your data in this way.

# How long we keep your information?

We will keep your personal information only for as long as necessary in line with regulatory and legal requirements and will destroy it securely when it is no longer needed. We have a retention

schedule that we use to manage the length of time we keep personal data and if you would like to know any specific timescales listed on it, please contact us using the contact details on this form.

# How we protect your information?

The security of your information is important to us. We protect your information by maintaining physical, electronic, and procedural safeguards in relation to the collection, storage, and disclosure of personal data to prevent unauthorised access, accidental loss, disclosure, or destruction.

### Where we process your information?

We only process your information within the United Kingdom and European Union. We may process your information outside the UK or European Union. Where this is the case, we will not transfer your information to other countries outside the EEA unless it is unavoidable to allow us to deliver our products and services. If we do, we take care to ensure the same level of privacy and security as the UK. However, we use our reasonable endeavours to protect the security of your personal information from unauthorised access.

### How we share your information?

From time to time we may send information to, receive information from, or exchange your personal information with:

- partners or agents who support us to deliver our products and services to you, or that we refer you to, or that refer you to us;
- companies who perform essential services for us;
- third-party organisations that conduct research, analysis, and marketing activities on our behalf;
- regulators, courts, or other public authorities;
- the emergency services in the case of accident or emergency.

We will only share or exchange data with third parties with the protection of a written agreement and the ability to oversee their activities, unless information is required for legal or regulatory reasons.

We may share your information with organisations based outside the UK and / or European Union. Where this is the case, we will only do so provided that organisation complies with local data protection regulations and with the protection of a written agreement.

Where we have relationships with other organisations that process your information on our behalf, we take care to ensure they have high data security standards. We will not allow these organisations to use your personal information for unauthorised purposes.

If the business is reorganised or sold to another organisation, we may transfer any personal information we hold to that organisation.

In the event that a third party may deliver all or part of the service requested by you, whilst the information you provide will be disclosed to them, it will only be used for the administration of the service provided and to maintain management information for business analysis.

Those third parties who would wish to send you marketing or to advertise to you will fall into the following categories:

#### • Retail Online retail

General stores, Automotive (including dealerships and accessories), Property, Home furnishings, Home improvement, Fashion, and clothing, FMCG and Pharmaceutical, IT and home computing, Telecoms and utilities, Home Service.

• Finance Pensions

Loans, credit cards, mortgages, Investments, and savings.

Insurance

Home, Car, Travel, Pet, Personal and other insurances.

Travel

Holidays, Hotel, Airlines and Travel booking.

Lifestyle

Health & Well-being, Call Centre and Fitness, Charities, Media & publishing companies, Leisure, Aditus (Publishers of National Geographic and Auto Express), Gaming / Gambling, Legal Services, Educational institutions, Government, Market research and Mobility Sector.

• Claims Management Service Personal Injury Claims

Financial products/services Claims such as Credit / bank card charges, Unenforceable consumer credit agreements, Mis-sold PPI, Mis-sold mortgages, pensions, and investments, SERPS.

. Repair of household goods

#### **Marketing service providers**

We may share your data under strict license terms with marketing service providers for the purposes of creating products and services to help organisations understand the likely characteristics of their customers, communicate with them more effectively, and find others like them across a range of marketing channels. Our Marketing Service Providersinclude:

- Money Matters
- Household Matters
- Consumer Matters
- Important Matters
- Your Brand Cover
- One Life <a href="https://onelifegroup.co.uk/">https://onelifegroup.co.uk/</a>
- Choose Leads Ltd <a href="https://www.chooseleads.co.uk/wp-content/uploads/2021/05/Privacy-Policy-2021.pdf">https://www.chooseleads.co.uk/wp-content/uploads/2021/05/Privacy-Policy-2021.pdf</a>
- OVO Energy
- EC Outsouring Ltd
- Energy Compare Ltd
- Homeshield

Data protection regulations mean you have rights over how we hold and use the information we hold about you:

#### • Your right to manage consents

You have the right to give your consent to us using your data for any activities we do not have another lawful basis to carry out, for example sending you marketing communications. You can withdraw consent at any time.

#### Your right of Access

You have the right to request access to the information we hold about you; this is called a Data Subject Access Request

#### • Your right to know about sharing

You have the right to know who your data is shared with and why

#### Your right to rectification

You have the right to have your details updated if they are inaccurate and for information not required for lawful reasons to be deleted. You also have the right to ask us to complete information you think is incomplete.

#### • Your right to erasure

You have the right to ask us to erase your personal information in certain circumstances.

#### • Your right to object to processing

You have the right to object to the processing of your personal data in certain circumstances.

#### • Your right to restriction of processing

You have the right to have automated processing and profiling restricted. Profiling may be used to analyse or predict economic situations, health, personal preferences, interests, reliability, behaviour, location, or movements

#### • Your right to data portability

You have the right to request that information we process by automated means is sent to you or another nominated data controller in a commonly used electronically readable format

You are not required to pay any charge for exercising your rights. If you make a request, we will respond to you within one month.

If you wish to action any of the above, please contact us by:

- E-mailing datarep@datarepservice.com , worivo@datarepservices.com
- Writing to 120 High Road, London. N2 9DN

Telephoning us on+44 7528 705481

Please do not include confidential information in e-mails or letters.

You can also complain to the data protection regulator if you are unhappy with how we have used your data.

In the UK, the regulator is the Information Commissioner's Office (ICO), Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-

# **Changes to this policy**

We regularly review and update this policy. You may view the most recent version on our website which was last updated on 21st October 2024.

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