Who are we?
We are Hedge App Limited (Tumelo/us/we) and operate under the name Tumelo.

Our companies house number is 11072709 and our FCA registration number is 821207. We live in the RBS building, Avon Street, Bristol, BS2 0PT. We are registered with the Information Commissioner’s Office under the number ZA487614

We are committed to protecting and respecting your privacy.

How to contact us
You can email us at hello@tumelo.com.

You can write to us at Tumelo, Flat 13 Berkeley house, Charlotte Street, BS1 5PY.

The information we hold about you

Personal information submitted through our app or website

This includes but is not limited to:
- Your name
- Your address
- Your date of birth
- Details regarding your personal financial situation
- Your thematic preferences
- Your National Insurance Number

Details about your transactions with us

We will keep a record of any transactions between your Tumelo account and current account.

Information regarding the devices you use to interact with our services

This includes but is not limited to:
- Website link clicks
- Time spent on webpages
- Device operating system
- Device
- Browser
- IP address (captured and stored only in anonymized form)
- Geographic location (country and city only)

How we use your information

To contractually provide our services, we use it to:
- Provide financial advice
- Help us maintain your account and provide you with information about your account

To meet our legal obligations, we use it to:
- Prevent illegal activities like money laundering, tax evasion and fraud.
- Comply with compliance obligations outlined by the FCA
To exercise what’s known as our legitimate interests. This is when we use data for a reason which is in your and/or our interest, and which doesn’t involve overriding your privacy rights. We use it to:

- Track, analyse and improve the services we give you and other customers with better user feedback
- Market products and services both in and outside of the app.

Who we share it with

We may share your information with:

- Anyone who works for us and needs to do their job
- Any organization which supports any of our service that you use. That includes:
  - Know Your Customer providers
  - Anti-money laundering check providers
  - Cyber security providers
  - Custodians
- Companies that do advertising for us
- Anyone who you give us explicit permission to share your data with

We will also share it to comply with the law; to enforce our terms and conditions or other agreements; or to protect the rights, property or safety of us, our customers or others.

How long we keep it

We keep your information for as long as you use Tumelo, and for 6 years afterwards to comply with the law. In some cases, we may keep it for longer such as for anti-money laundering purposes.

Your rights

You can:

- Ask us for the personal data we hold on you, or to get a copy of it.
- Make us correct inaccurate data.
- Ask us to delete your data, however for legal reasons we may not be able to.
- Object to us using your data for direct marketing and in certain circumstances research and statistical reasons.

To do any of the above, please contact us at help@tumelo.com.

Where we store it

Since we use the cloud, we may transfer and store the data we collect from you somewhere outside the European Economic Area. People who work for us or our suppliers outside the EEA might also process your data. We will only share your data with organisations and countries that:

- The European commission say have adequate data protection
- We’ve agreed standard data protection clauses with

Hotjar

We use Hotjar in order to better understand our users’ needs to optimize our service. Hotjar is a technology service that helps us better understand our users experience (Hotjar stores this information in a pseudonymized user profile.) Neither Hotjar nor we will ever use this information to identify individual users or to match it with further data on an individual user. For further details, please see Hotjar’s privacy policy by clicking on this link.
You can opt-out to the creation of a user profile, Hotjar’s storing of data about your usage of our site and Hotjar’s use of tracking cookies on other websites by following this https://www.hotjar.com/legal/compliance/opt-out.

How to make a complaint
If you have a complaint, please contact us and we will do our best to fix the problem. If you’re still not happy, you can refer your complaint to the Financial Ombudsman Service. For more details, you can visit their website at www.financial-ombudsman.org.uk.

Changes to this policy
We’ll keep our privacy policy up to date on both our website and through the app. If we make any significant changes to it we will notify you by email.