



POLICY NAME: CUSTOMER PRIVACY NOTICE

VERSION NUMBER: **1.0**

October 13, 2020

March 15, 2023

EFFECTIVE
DATE:

LAST REVISED
DATE

PROCEDURE

1.0 Who are we?

Global Debt Recovery Limited (GDR) is a debt collection agency who works on behalf of a wide range of organisations including banks, retailers and credit card, mobile phone, home shopping and utility companies.

If you are a Global Debt Recovery Limited customer this means that GDR has either bought your account or has been instructed by the debt owner to collect the amount that you owe. We refer to this as "your account" in this privacy notice and we will work with you to arrange repayment of the outstanding balance.

Our details are:

Global Debt Recovery Limited
8-10 Coombe Road
New Malden
Surrey
KT3 4QE

Company number: 2597906

We are the processor of your information which means that we are responsible for processing your data on behalf of the controller. We will confirm to you who the controller is separately.

2.0 Our Privacy Promise to you:

- We promise to be fair and transparent
- We treat the security of our customers data seriously
- We believe in integrity and respect your privacy

3.0 What does this mean for you?

Our privacy notice provides you with information about how we use your personal data, which we are required by law to give you. Each section sets out different information:

- Our identity as a data controller and our contact details
- Types of personal data we collect and how we collect it
- The legal basis on which, and the purposes for which, we are processing your personal data

- How long we keep your personal data for
- Who we share your personal data with
- Transferring your personal data outside of the EEA
- Credit reference agencies
- Sharing information to prevent crime or harm
- How you can manage your personal data
- How to complain

We set out how your personal data will be used by Global Debt Recovery Limited as the data processor. You can contact our Data Protection Officer (DPO) at: 8-10 Coombe Road, New Malden, KT3 4QE or alternatively by email: info@globaldebtrecovery.com

4.0 What information do we collect about you?

We collect:

- Your name
- Your contact details
- Your gender
- Your date of birth
- Your account details including your account number and outstanding balance
- Financial information about you, including your credit score, credit history and payment history, information about defaults and missed payments, credit reference information, income and expenditure and any other details relating to your account with us and your ability to pay the amounts you owe
- Details of any County Court Judgements which you may have
- Details of any bankruptcy or insolvency proceedings which you have entered into
- Call recordings
- Information about you contained in correspondence with you and with third parties
- Your bank account information if you set up a Direct Debit or Standing Order with us
- If you make a payment by credit or debit card, we process your card information for the purposes of taking your payment but we do not store your card details and
- Details of any queries, disputes or complaints you may raise with us

Where you provide us with information about your family, lifestyle and social circumstances, employment status and your work history, we may record and use this information where it affects your account with us.

Where it has or may have an impact on your ability to pay the amounts you owe, we may collect information about your mental and physical health. For more details about how we use this information please see section 5.0

5.0 Where do we get your information from?

5.1 Information that you give us

You may give us information about yourself and your circumstances:

- In any communication with us by telephone, email, post or otherwise, whether this is in connection with your account or to report an issue, ask questions or make a complaint and
- By visiting our website or filling in contact forms on our website

5.2 Information that we collect about you

We may collect information about you that is publicly accessible if we have been unable to locate you using the contact details that we hold for you, for example:

- Through a Google search
- News and social media reports
- Entries in online directories
- Information which is available at Companies House

We may collect limited information, such as media reports, about any current criminal convictions you have if we have reason to believe that you may be in prison. We will use this for the purposes of updating the information we hold about you and managing your account. We may also use this information for the purposes of crime and fraud prevention and for complying with our obligations under the anti-money laundering and counter-terrorist financing other legislation.

5.3 Information that we obtain from third party data providers

We may also obtain information about you from third party data providers which are not credit reference agencies. We use this third party information to identify customers who have become bankrupt or insolvent or are deceased. We also use it to confirm your contact details.

5.4 Information we obtain from our clients

If we provide credit management solutions to other companies to help them manage the accounts that you have with them, they may provide information about you for us to provide those solutions including to confirm and verify that it is accurate, complete and up to date.

5.5 Call recording

We may monitor and/or record calls for the purposes of resolving issues on your account, training and to improve our quality and service standards

5.6 CCTV images

We operate CCTV at all of our premises, if you visit any of our offices, you will be recorded by our CCTV system.

We may combine the information that you give us with the information we collect about you from the other sources listed above.

6.0 Why do we need your information?

6.1 Debt Collection Activities

We need your information in order to carry out our debt collection activities. These include:

- locating you, checking your identity and confirming that the information we hold about you is correct
- managing your account
- agreeing payment plans which are tailored to your individual circumstances

- processing any payments you make
- providing information to the credit reference agencies about the payments you make and any payments you miss

As we have been instructed on your account, we have a legitimate interest in collecting the amounts that you owe under the agreements that you have entered into.

Where we process your information on the basis of “legitimate interests” we must make sure that those legitimate interests do not override your interests, rights and freedoms. We must do this by carrying out a legitimate interest assessment which we must share with you. This is set out below.

1.1.1 What are legitimate interests?

- As we have been instructed to collect your debt from the owner of your account it is in our commercial interests to collect the amounts that you owe under the agreements that you have entered into
- We will always deal with your account in the way we believe is in your best interests. This includes agreeing a payment plan which is tailored to your individual circumstances to help you reduce the amount you owe
- We provide additional support to those individuals who may be vulnerable.
- It is also in the public interest for debts which are properly owed to be repaid. This is important for the economy as it helps to keep the cost of borrowing down and means that people continue to have access to credit.

If we don't process your information, we can't:

- Make sure we are dealing with the correct person
- make sure that the information we hold about you is correct
- collect the amounts that you owe
- manage your account in the way that we believe is in your best interests
- agree a payment plan with you which is tailored to your individual circumstances
- provide you with additional support when you need it and
- Provide the credit reference agencies with accurate and up to date information about the amounts that you owe.

6.1.1 What is the impact on you?

We collect, use and share your information as set out in this privacy notice, which means that we and the third parties we've told you about have access to your information.

However, we are authorised by the Financial Conduct Authority which means that we are required to act fairly, ethically and lawfully.

We also minimise the impact on your data protection rights, interests and freedoms by:

- making sure we comply with the data protection rules including the UK Data Protection Act and GDPR
- only collecting the minimum amount of information we need to carry out our debt collection activities
- having a retention policy to make sure that we don't keep your information for any longer than we need it

- carrying out data protection impact assessments to make sure that we identify any potential privacy risks and put appropriate measures in place to protect you from those risks
- providing you with this privacy notice which explains how we use your information, what your rights are and how to exercise them and
- putting in place appropriate security measures to protect your information

7.0 Special Categories of Personal Data

Under the data protection rules, information revealing the following are “special categories of personal data”:

- Racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Trade union membership
- Genetic information
- Biometric information
- Information concerning health (including mental and physical health)
- Sex life or sexual orientation

The FCA also requires us to treat customers fairly and to understand whether our customers may be vulnerable. A customer may be vulnerable if their personal circumstances mean that they are at greater risk of harm, for example they are in financial difficulties, they experience one or more major life events or they have a physical or mental health condition.

We only collect the minimum amount of information about any physical or mental health conditions you may have. We need to make sure:

- We comply with the FCA’s requirements to treat you fairly and assess whether we believe you may be a vulnerable customer or whether you may need additional support from us
- Understand whether your condition has or may have an impact on your ability to pay the amounts you owe
- We deal with your accounts in the way we believe best suits your needs
- We make sure that any payment plan which we agree with you is tailored to your circumstances
- Wherever possible, we communicate with you using your preferred method of communication and
- We take any other steps we believe are necessary to deal with you fairly

Where you provide us with information relating to your health by telephone, we will obtain your explicit consent to record and process that information. You can withdraw your consent to us processing and storing this information at any time.

Where you provide us with information relating to your health in writing, we will assume your consent and record and process that information. We will write to you to advise we have logged the detail and you can withdraw your consent to us processing and storing this information at any time.

To withdraw your consent to Global Debt Recovery Limited processing information relating to your physical and mental health conditions, please contact our Data Protection Officer:

- By email at info@globaldebtrecovery.com
- By letter at Data Protection Officer, Global Debt Recovery Limited, 8-10 Coombe Road, New Malden, Surrey, KT3 4QE
- By telephone 020 8336 7000

If you withdraw your consent to us processing information about your physical and mental health conditions, it may prevent us from acting in your best interests, such as providing you with a payment plan which is appropriately tailored to your needs or offering you any additional support which you may need.

If we believe you are in immediate danger, we may process information relating to your physical and mental health conditions (including sharing this information with the emergency services) on the basis that it may be a life and death situation.

If you send us information about your health conditions either by post or by email, we will use this information in the way that we've explained above on the basis that we need it to protect your economic well-being as you may be vulnerable or at economic risk due to your health conditions.

8.0 Information relating to criminal convictions

We may collect some limited information including information that is publicly accessible, such as media reports, about any current criminal convictions you may have (prison name, prison number, date of conviction and length of service) if we have reason to believe that you may be in prison.

We may also use publicly accessible information, for example through a Google search, to confirm that any information which we have been provided with about your criminal convictions is accurate.

We will use this for the purposes of updating the information we hold about you and managing your account. We may also use this information for the purposes of crime and fraud prevention and for complying with our obligations under the anti-money laundering and counter-terrorist financing legislation.

We only collect the minimum amount of information about your current criminal convictions that we need to confirm and update the information we hold about you and to make sure that we:

- Deal with your accounts in the way that we believe best suits your needs
- Take any other steps we believe are necessary to deal with you fairly

Where you (or someone authorised to act on your behalf) has provided us with the information, we use it on the basis that you have given us your consent to do so and you can withdraw your consent to us processing this information at any time.

To withdraw your consent to Global Debt Recovery Limited processing information about your criminal convictions, please contact our Data Protection Officer:

- By email at info@globaldebtrecovery.com

- By letter at Data Protection Officer, Global Debt Recovery Limited, 8-10 Coombe Road, New Malden, Surrey, KT3 4QE
- By telephone 020 8336 7000

If you withdraw your consent to us processing information about your criminal convictions, it may prevent us from acting in your best interests, such as providing you with a payment plan which is appropriately tailored to your needs or offering you any additional support which you may need.

Where we collect publicly accessible information or someone else (who is not authorised by you) provides us with information about your criminal convictions, we use this information on the basis that we need it to deal with and make decisions about your account for the purposes of establishing and exercising our legal rights.

Where we use information about your criminal convictions and share it with third parties for the purposes of crime and fraud prevention, we do this on the basis that this is in the public interest. Where we use this information and share it with third parties for the purposes of complying with our obligations under the anti-money laundering, counter-terrorist financing and other legislation, we do so on the basis that this is necessary for us to comply with our legal obligations.

9.0 Who do we share your information with?

We sometimes need to share some of your information with other organisations.

Information that we share with regulatory authorities and Ombudsman Services:

We are authorised by the Financial Conduct Authority. This means that we are required to report certain things to the FCA which may mean sharing information about you if there is an issue or complaint to them, we may have to share information about you and your account.

Information that we share with our clients:

We may share some limited information with the owner of your account if we need to verify any of the information that they have provided us or if there is an issue with your account.

We may also share call recordings and information about your account with our clients and prospective clients for quality assurance purposes.

Information we share with debt management companies:

To assist in the management of your account we will confirm and verify information that your debt management agency provides us with to ensure it is accurate, complete and up to date. We may also share information such as your contact details and information about how you manage your account with us in order to help the debt management agency manage the accounts you have with them.

10.0 Where is your information stored?

Your information is stored on servers and filing systems in the UK. We always make sure that there are appropriate safeguards in place to guarantee that your information – and your rights – are protected to the same high standard as under UK law.

11.0 How long do we keep your information for?

We only keep your information for as long as we need it and we will keep your information for no more than 7 years from the date you cease to have any accounts with us. We keep your information for this long so that we can:

- Deal with any issues or concerns that you may have about how we handled your account
- To answer any questions HM Revenue and Customs may have
- Defend any legal claims

However, we won't keep all of your information for so long, and we will delete some information much sooner.

We have a retention policy which we have written considering all the different types of information that we hold about you, understanding how long we need to keep it for and agreeing not to keep it any longer.

12.0 What rights do you have?

Under the data protection rules, you have a number of rights in respect of your information and the way we use it. Some of these rights only apply in certain situations. We explain below what rights you have, what these mean and how they apply to the way we use your information.

You have the right to	What does this mean?	How does this apply to the way we use your information?
Access your information	<p>You can ask for:</p> <ol style="list-style-type: none">1. Confirmation that we process your personal information2. A copy of your personal information that we hold and3. Other information about how we process your information	<p>We will provide you with a copy of your personal information which we hold unless the data protection rules provide an exception that decide to rely on. We may also edit out the names of any other individuals to protect their privacy.</p> <p>Wherever possible we will provide you with a copy of your personal information in the same manner you make your request unless we agree otherwise with you.</p> <p>This privacy notice also includes the other information you can ask for about how we process your information.</p>

<p>Have your information rectified</p>	<p>You can ask us to rectify your information if it is not accurate, complete or up to date</p>	<p>We will update or correct your information, although sometimes we may need to ask you to provide evidence to confirm the changes, for example, a marriage certificate to change your name due to marriage.</p>
<p>Have your information erased</p>	<p>This is also known as the right to be forgotten.</p> <p>You can ask us to delete your information where:</p> <ol style="list-style-type: none"> 1. We no longer need it 2. We rely on your consent to use your information and you withdrew it 3. You object to our processing it and we have no overriding legitimate grounds to continue processing it or 4. We are legally required to delete it <p>This right does not apply where:</p> <ol style="list-style-type: none"> 1. We are legally required to keep your information under law eg money laundering 2. We have a compelling legitimate ground for using your personal information or 3. We need your information to establish, exercise or defend legal claims, for example where there are ongoing court proceedings 	<p>As we rely on the legitimate interests for most processing of your personal information, we will only be able to delete your personal information:</p> <p>If you withdraw consent for us to use information about your physical or mental health or criminal convictions which you provided to us by telephone. If you withdraw your consent to us using this information, it may prevent us from acting in your best interests, such as providing you with a payment plan which is appropriately tailored to your needs or offering you any additional support which you may need.</p> <p>If you object to our processing your personal information and to carry out your request we have to erase your information and</p> <p>Where we no longer need your information. Although our retention policy means that we will delete your information once we no longer need it.</p>

<p>Restrict our processing of your information</p>	<p>You may ask us to restrict our processing of your personal information where:</p> <ol style="list-style-type: none"> 1. You believe the information we hold about you is inaccurate while we check whether it is accurate 2. We no longer need your information but you need it to establish, exercise or defend a legal claim or 3. You object to our processing your personal information while we reconsider our legitimate interests assessment 	<p>We will not process your personal information whilst we consider your request.</p> <p>We will inform you if we begin processing your personal information again and explain why.</p>
<p>Have your information transferred to you and/or a third party</p>	<p>This is also known as the right to data portability.</p> <p>You can ask us to provide you with a copy of the information which you have provided to us and which we hold electronically</p>	<p>This right only applies to the information about your physical and mental health and criminal convictions which you provided to us by telephone and which we use with your consent.</p> <p>We will provide this information to you in a commonly-used and machine readable format.</p>
<p>Object to our processing of your information including profiling</p>	<p>You can object to our use of your information, including profiling unless:</p> <p>We have compelling grounds for using your information OR</p> <p>We need to use your information to establish, exercise or defend a legal claim, for example where there are ongoing court proceedings</p> <p>You can also object to us using your information for marketing purposes.</p>	<p>We use profiling to make sure that we manage your account in the way that is in your best interests.</p> <p>If we were to stop using your information for profiling, we may not be able to provide you with the same level of customer service to tailor our approach to your personal circumstances in the same way.</p>

We will always do our best to respond to your request within one month of receiving it and any additional information we need to confirm your identity and understand your request.

However, sometimes we may need some more time to deal with your request, particularly if it is complicated. Where this happens, we will write to you within one month and let you know why we need some more time and when we will provide you with our response.

If we are unable to carry out your request, we will send you a response explaining why.

If you would like to exercise any rights, please contact our Data Protection Officer by writing to them at Global Debt Recovery Limited, 8-10 Coombe Road, New Malden, Surrey, KT3 4QE.

13.0 What if you have a complaint?

If you have any questions, concerns or complaints about the way Global Debt Recovery Limited processes your personal information, please contact our Data Protection Officer in the first instance at Global Debt Recovery Limited, 8-10 Coombe Road, New Malden, Surrey, KT3 4QE and they will do their very best to help you.

If you are not happy with the way we have handled your complaint or are still concerned about our handling of your personal information, you have a right to take your complaint to the Information Commissioner's Office at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF and www.ico.org.uk

14.0 Changes to this notice

We will regularly review this notice and keep it updated to make sure that the information we provide you with is accurate and up to date. Any changes to this notice will be highlighted so that you can see what has been changed. Where we have made a significant change to the information contained we will let you know via email or letter.

The last review was undertaken in March 2023.