



THE DEBT RECOVERY BUREAU

## Privacy Policy

The Debt Recovery Bureau LLP is committed to the protection of your privacy and your personal data. All personal data is processed fairly and in accordance with the law. This policy explains what personal data we process in the course of our activities.

### Who we are

We are the Debt Recovery Bureau LLP (DRB), registered number OC316500. We are registered with the Information Commissioner number Z9291643.

We collect debts on behalf of our clients who remain the Data Controller for your personal data. DRB are a Data Processor on behalf of the Data Controller.

Our address is: 415 The Greenhouse, Custard Factory, Gibb Street, Birmingham. B9 4DP

### How we collect your personal data

Your data will initially be provided by the Data Controller, our client who has instructed us to collect the debt on their behalf. We may combine this data with data from third party sources which may include Land Registry, Probate Service, credit reference agencies, trace agents, registers of court judgments, The Insolvency Service, The Electoral Roll, general Internet-based searches, anyone you give us authority to speak with on your behalf (such as a debt adviser) and in the process of our communications with you.

One of the legal bases for which we process your personal data is legitimate interest. Our processing of your data is necessary for the legitimate interests of our client, to whom a debt is due and legally owed.

### What personal data we collect

The personal data that we collect, process and retain may include any of the following: your name(s), address(es), telephone numbers, email addresses, employment details, date of birth, comments from calls, copies of post, transactional details, income and expenditure details, bankcard details for payments, details of legal action taken against you, details of assets owned.

### How we use your personal data

We will use your personal data for:

- Debt collection purposes and to provide services to our client with regard to your debt due to them
- Setting up, maintaining and monitoring payment plans and ensuring your payments are applied to your account
- Providing you with an effective service



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### Who we will share your data with

We may share your data with the following:

- Payment processors for handling payments
- Print and mail service providers for the purpose of contacting you by post
- Credit reference and trace agencies for the purpose of ensuring we are writing to you at your most recent address
- Providers of field agent services for the purposes of visiting you to discuss the outstanding debt
- Solicitors for the purposes of commencing legal action against you

Data collected from third parties may be passed on to the Data Controller to allow them to make informed decisions regarding your debt with them.

We do not send any data outside of the EU.

### Storage and Security

We do not retain any data longer than is necessary for the purposes detailed within our privacy policy. Data will normally be held for 6 years after last contact or payment regarding your account; this is to ensure that we protect our and our client's position in the event of a legal dispute.

All information is stored on secured servers in the UK and only authorised personnel have access to your data. When data is sent to or received from third parties including our clients, it is secured by encryption.

### Sensitive Personal Data

You may voluntarily provide sensitive personal data to us during the normal course of communication. We will only use this sensitive personal data for debt collection purposes and will only share this with third parties (such as field agents) and clients who need to be aware for debt collection purposes.

### Right of Access

You have the right to see the personal data (as defined by the Data Protection Act) that we hold about you. To request this information, you should write to the Data Controller (ie the creditor to whom you owe money; our client) who will arrange for all personal data to be provided, including that which we hold.

As we are Data Processors, hold the data on behalf of the Data Controller, any requests for data sent to us will be forwarded to the Data Controller.

Please note that the Data Controller may well ask you for proof of identity before supplying any information, in order to protect your data from any unauthorised third parties.

### Right not to be subject to automated decision-making or profiling

DRB does not employ such processes.



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### Right to Object to Processing

As a data subject, you have the right to object to us processing your data if it is an unwarranted interference with your interests or rights. However, as outlined above, we do have a legal basis to process your data, being the legitimate interests of our client to recover a debt due and legally owed. We are therefore able to process your data, including for the purpose of making contact with you in order to agree a suitable way for you to repay the debt.

If you still believe you have a valid and justifiable reason to exercise this right, you should write to us at the address above explaining why you believe our processing activities constitute an unwarranted interference with your interests and/or rights. We will then confirm in writing whether or not we agree with your claim.

Should you have a genuine reason to doubt the validity of the debt, please telephone us on 01827 768744.

### Rights to Rectification and Erasure

You have the right to ask us to amend any information we hold about you that you believe to be incorrect or wrong. If this is the case, please provide evidence to us in writing. We will write back to you and confirm if we agree and what action we have taken.

You have the right to request that we erase data held about you. However please note that we have the legitimate right to hold your personal data and the need to hold it for 6 years after completing processing.

### Changes to Privacy Notice

We regularly review and amend our Privacy Notice. It was last updated on 1<sup>st</sup> October 2018.