

## PRIVACY POLICY

Your privacy is very important to us. We promise to respect and protect your personal information and try to make sure that your details are accurate and kept up to date. This Privacy Policy sets out details of the information that we may collect from you and how we may use that information. Please take your time to read this Privacy Policy carefully. When using our website, this Privacy Policy should be read alongside the website terms and conditions.

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### 1. About JBW Group and Collect Services

In this Privacy Policy references to "**we**" or "**us**" are to JBW Group Limited, trading under "JBW Group" and "Collect Services". We are part of the Outsourcing Inc. group of companies.

In order to provide our services, we will collect and use data about individuals. This means that we are a 'data controller' and we are responsible for complying with data protection laws.

We have appointed a data protection officer to oversee our handling of personal information. If you have any questions about how we collect, store or use your personal information, you may contact our data protection officer using the details set out in the "Contact Us" section.

## **2. Our processing of your personal information**

The personal information that we collect will depend on our relationship with you. Please look in the section below that best describes your relationship with us.

For example, we will collect more detailed information about you if you are a customer than we would if you simply made an enquiry about the services that we offer.

Sometimes we will ask for information relating to your health which is known as 'special categories of information'. When we are carrying out enforcement activities, we are required to determine whether those subject to enforcement action could be regarded as vulnerable. In order to make this determination we may ask you for, or you may volunteer to give us, information about your vulnerability.

If you provide personal information to us about other people you must provide them with a copy of this Privacy Policy and obtain any consent where we indicate that it is required for the processing of that person's information in accordance with this Privacy Policy.

**2.1 Individuals who we collect debt from and carry out enforcement action against (for the purposes of this policy, we shall refer to such individuals as Customers)**

This section will detail what personal information we collect about you and use if we have been asked to carry out enforcement action against you and collect debt from you on behalf of our Clients.

**2.1.1. What personal information will we collect?**

- Name (surname, forename, middle name)
- Title
- Age Range
- Deceased date (where applicable)
- Address
- E-mail address
- Phone number
- Gender
- Business or company name
- Profession
- Job title
- Employment status
- Employer details (employer name, occupation, office, registered office, start date, salary)
- Car registration and keeper details
- Visual and audio images of you through our use of Body Worn Video and audio recording equipment
- Council tax band of your address
- Credit reference data
- The location of your address or vehicle
- Financial information such as credit/debit card information
- Bank details that you have permitted us to use on your behalf
- Date of birth
- Information relating to your financial status / solvency
- Information relating to your debt
- Any information in client's notes
- Details about the property associated with a visit
- Personal information collected pursuant to the debt collection and enforcement process
- Means form information
- Information obtained from credit and tracing checks including lifestyle information such as whether you are ex-directory, have active credit or do online shopping
- Information obtained from public sources such as social media profile names
- Caller line identification
- Recording of telephone calls
- Technical information about any visit that you make to our website, including IP address, login information and information about your web browser and operating systems.

### 2.1.2 What special categories of information will we collect? ►

- Information about your physical and mental health, in particular information about any disabilities you may have, illnesses or medical conditions or whether you are pregnant.

### 2.1.3 How will we collect your personal information? ►

- We will be provided with personal information by our clients when they register a new case with us.
- From third party Credit Reference and Tracing Agencies
- From public sources such as Google
- From the DVLA
- From specialist third parties who we liaise with to carry out our services such as hire purchase information providers, removal companies and auction houses
- Where we visit your address, from our agents' body worn video and audio recording equipment
- Other parties residing or otherwise present at your property when it is attended by enforcement officers
- From our website through the use of cookies.

### 2.1.4 What will we use your personal information for?

We may process your information for a number of different purposes. For each purpose we must have a legal ground for such processing and we will rely on the following legal grounds:

- **We have a legitimate business need to use your personal information.** Such need will cover all activities required to carry out everyday business activities and will include:
  - keeping business records
  - using your personal information to carry out our debt collection and enforcement services
  - ensuring that we have up to date records
  - management information
  - statistical analysis
  - developing and testing our systems
  - analysing our business
  - improving the services we offer
  - carrying out strategic reviews of our business model.

When relying on this legal ground, we are under a duty to assess your rights and to ensure that we do not use your personal information unless we can demonstrate a legitimate business need.

Please see [the table](#) below for further details of the different ways we use your personal information and the legal grounds we rely on when doing so.

- **It is necessary to comply with a legal obligation.** For example, our obligations under the law to protect vulnerable people.

When we use your "special categories of personal information" (such as information about your

health), we need to have an additional "legal ground" and we will rely on the following "legal grounds":

- **That it is in the substantive public interest.** Such as where it is necessary under the law in order to protect the interests of vulnerable people.

Please see below for further details of the different ways we use your personal information and the legal grounds we rely on when doing so.

Purpose for processing ►	Legal grounds for using your personal information ►	Legal grounds for using your special categories of information ►
<ul style="list-style-type: none"> <li>• To carry out enforcement action and collect debt on behalf of our clients</li> </ul>	<ul style="list-style-type: none"> <li>• We have a legitimate interest to fulfil our contractual obligations to our client</li> </ul>	<ul style="list-style-type: none"> <li>• Not applicable</li> </ul>
<ul style="list-style-type: none"> <li>• Processing information and evidence about individuals to assess their vulnerability</li> </ul>	<ul style="list-style-type: none"> <li>• It is necessary to comply with a legal obligation</li> </ul>	<ul style="list-style-type: none"> <li>• It is in the substantial public interest to protect the interests of vulnerable people</li> </ul>
<ul style="list-style-type: none"> <li>• Recording all call centre and visit interactions with all individuals who we collect debt from and carry out enforcement action against</li> </ul>	<ul style="list-style-type: none"> <li>• We have a legitimate interest to have records of all interactions with customers for business records, to record any incidents with our staff and for any complaints that arise</li> </ul>	<ul style="list-style-type: none"> <li>• Not applicable</li> </ul>
<ul style="list-style-type: none"> <li>• Taking payment details from customers</li> </ul>	<ul style="list-style-type: none"> <li>• We have a legitimate interest to ensure payment can be made in relation to debt we are collecting</li> </ul>	<ul style="list-style-type: none"> <li>• Not applicable</li> </ul>
<ul style="list-style-type: none"> <li>• Storing and processing of previous cases for the purpose of enforcing potential future claims</li> </ul>	<ul style="list-style-type: none"> <li>• We have a legitimate interest to effectively enforce future claims by our clients</li> </ul>	<ul style="list-style-type: none"> <li>• Not applicable</li> </ul>
<ul style="list-style-type: none"> <li>• Construction of a Single Customer View so that all customer cases can be viewed under a single record</li> </ul>	<ul style="list-style-type: none"> <li>• We have a legitimate interest to collate information in this way to reduce fees for customers and to</li> </ul>	<ul style="list-style-type: none"> <li>• Not applicable</li> </ul>

	ensure that customers are not visited multiple times for different cases	
<ul style="list-style-type: none"> <li>Augmenting information provided by our clients with information provided from third parties such as credit reference agencies and the DVLA</li> </ul>	<ul style="list-style-type: none"> <li>We have a legitimate interest to supplement information in this way to avoid disproportionate efforts of having multiple collections for our clients</li> </ul>	<ul style="list-style-type: none"> <li>Not applicable</li> </ul>

### 2.1.5. Who will we share your personal information with?

From time to time, we may share your personal information with companies in the JBW group or with the following third parties for the purposes set out in the table in section 2.1.4 above:

- Our clients who have instructed us to carry out debt collection and enforcement services on you
- Self-employed enforcement agents to assist in delivery of our debt collection and enforcement services
- Credit reference and tracing agencies including Call Credit Ltd and Equifax Ltd. See links below for their privacy notices:
  - <https://www.callcredit.co.uk/legal-information/bureau-privacy-notice>
  - <https://www.equifax.co.uk/crain.html>
- GB Group Plc for tracing, address cleansing and telephone appending
- Cardstream Ltd acting as a credit and debit card processor
- Streamline and Verifone for the processing of PDQ payments
- Adare SEC Ltd for the provision of correspondence and mailing services
- Google for the geocoding of addresses
- Esendex for the sending of SMS to get in touch with you, to remind you of payments that are due and to provide receipts of payments made
- The DVLA
- The Police and Courts
- Vehicle Recovery and Removal Firms
- Auction Houses
- Legal advisers
- Other parties residing or otherwise present at your address when it is attended by enforcement officers
- Other 3<sup>rd</sup> parties with whom you have authorised us to discuss your personal circumstances with

- Any third parties in the event of a sale, merger, reorganisation, transfer or dissolution of our business.

If you would like further information regarding the disclosures of your personal information, please see the "Contact us" section below for our contact details.

## 2.2. New Occupiers

This section will detail what personal information we collect about you and use if you are a New Occupier of an address that our records indicate was previously occupied by a Customer

### 2.2.1. What personal information will we collect?

- Name and address
- Evidence that you are the current occupier of the address
- Recording of telephone calls and any information contained in notes of the call
- Visual and audio images of you through our use of Body Worn Video and audio recording equipment
- Photos and any information contained in any notes made by our agents when they visit your property
- Technical information about any visit that you make to our website, including IP address, login information and information about your web browser and operating systems.

### 2.2.2. What special categories of information will we collect?

- We do not collect any special categories of information about you.

### 2.2.3. How will we collect your personal information?

- From call recordings and where we visit your address, from our agents' body worn video and audio recording equipment
- From our website through our use of cookies.

### 2.2.4. What will we use your personal information for?

We may process your information for a number of different purposes. For each purpose we must have a legal ground for such processing and we will rely on the following legal grounds:

- **We have a legitimate business need to use your personal information.** Such need will cover all activities required to carry out everyday business activities and include:
  - keeping business records
  - using your personal information to carry out our debt collection and enforcement services
  - - ensuring that we have up to date records
  - management information
  - statistical analysis
  - developing and testing our systems

- analysing our business
- improving the services we offer
- carrying out strategic reviews of our business model.

When relying on this legal ground, we are under a duty to assess your rights and to ensure that we do not use your personal information unless we can demonstrate a legitimate business need.

Please see the table below for further details of the different ways we use your personal information and the legal grounds we rely on when doing so.

Purpose for processing	Legal grounds for using your personal information	Legal grounds for using your special categories of information
<ul style="list-style-type: none"> <li>• To check that the Customer, from whom we are collecting, on behalf of our Client, is no longer resident at the address occupied by the New Occupier.</li> </ul>	<ul style="list-style-type: none"> <li>• We have a legitimate interest to ensure that we have accurate and up to date records of customers to ensure that we can properly carry out our services to our clients</li> </ul>	Not applicable
<ul style="list-style-type: none"> <li>• Recording all interactions with all New Occupiers</li> </ul>	<ul style="list-style-type: none"> <li>• We have a legitimate interest to have records of all interactions with New Occupiers for business records, to record any incidents with our staff and for any complaints that arise</li> </ul>	Not applicable

### 2.2.5. Who will we share your personal information with?

From time to time, we may share your personal information with companies in the JBW group or with the following third parties for the purposes set out in the table in section 2.2.4 above:

- In limited circumstances, with our clients, in order to resolve complaints.

If you would like further information regarding the disclosures of your personal information, please see the "Contact us" section below for our contact details.

### 2.3. Web Site Users

This section will detail what personal information we collect about you and use if you use our website, either browsing or interacting with the website to send us a message or register a complaint.

**2.3.1. What personal information will we collect?**

- Any information you may share with us when you visit our website
- Technical information about any visit that you make to our website, including IP address, login information and information about your web browser and operating systems.

**2.3.2. What special categories of information will we collect?**

- We do not collect any special categories of information about you.

**2.3.3. How will we collect your personal information?**

- Via our website

**2.3.4. What will we use your personal information for?**

We may process your information for a number of different purposes. For each purpose we must have a legal ground for such processing and we will rely on the following legal grounds:

- **“We have a legitimate business need to use your personal information.** Such need will cover all activities required to carry out everyday business activities and will include:
  - keeping business records
  - developing and testing our systems
  - diagnosing any problems with our website
  - responding to enquiries
  - assessing usage of our website
  - improving the services we offer.

When relying on this legal ground, we are under a duty to assess your rights and to ensure that we do not use your personal information unless we can demonstrate a legitimate business need.

Please see [the table](#) below for further details of the different ways we use your personal information and the legal grounds we rely on when doing so.

Purpose for processing	Legal grounds for using your personal information	Legal grounds for using your special categories of information
<ul style="list-style-type: none"> <li>• To respond to any enquiries you make</li> </ul>	<ul style="list-style-type: none"> <li>• We have a legitimate interest to respond to all enquiries made on our website</li> </ul>	Not applicable

**2.3.5. Who will we share your personal information with? ►**

From time to time, we may share your personal information with companies in the JBW group or with

the following third parties for the purposes set out in the table in section 2.3.4. above:

- No one at this stage.

If you would like further information regarding the disclosures of your personal information, please see the "Contact us" section below for our contact details.

### **3. How do we protect your personal information when sending it abroad?**

We do not send your personal information outside of the EEA. In the event that this changes, we will notify you.

### **4. What marketing activities do we carry out?**

We do not perform any marketing activities that use your personal information.

## 5. How long do we keep personal information for?

We will only keep your personal information for as long as reasonably necessary to fulfil the purposes set out in section 2 above and to comply with our legal and regulatory obligations.

**Customers with whom there has been no financial transaction:** Deletion of all customer data in all datastores. This will be scheduled 4 years after the return of the customer's last case to the client. Older data for customers who have cases that are still live or whose return date is younger than the 4-year threshold will not be deleted

**Customers with whom there has been a financial transaction:** The deletion policy is the same as above, but with a certain subset of data records retained for 7 years. These records are:

- The customer's name and addresses
- Contact details (e.g. email, phone) for the customer
- Case and warrant records for the customer
- Financial transaction records for the customer.

Where we receive new occupier evidence and vulnerability evidence which contains your personal information, that evidence will be assessed by our back office team and all photos or scanned documents will be deleted the next working day.

For further information regarding how long your personal information will be kept, please see the "Contact us" section.

## 6. Automated processing

We currently undertake some automated processing of your personal information in order to inform our businesses practices, such as comparing your personal information against trends or other data subjects with similar characteristics. None of this processing results in any legal or similar decision making in respect of you.

## 7. Your rights

You have a number of data protection rights which entitle you to request information about your personal information, to dictate what we do with it or to stop us using it in certain ways.

If you wish to exercise the rights set out below, please contact us at any time using the details set out in section 9. There will not normally be a charge for this.

We respect your rights in relation to personal information we hold about you, however we cannot always comply with your requests. For example, we may not be able to delete your information if we are required by law to keep it for a longer period of time or if we delete your information we would not have the necessary information we need in order to fulfil the purpose for which it was collected.

Your rights include:
<ul style="list-style-type: none"> <li>• <b>The right to access your personal information</b></li> </ul>
<p>You can request a copy of the personal information we hold about you and certain details of how we use it.</p> <p>Unless requested otherwise, your personal information will be provided to you by electronic means. If we do not hold an email address the information will be sent by post.</p>
<ul style="list-style-type: none"> <li>• <b>The right to rectification</b></li> </ul>
<p>We make reasonable efforts to keep your personal information where necessary up to date, complete and accurate. We encourage you to ensure that your personal information is accurate so please regularly let us know if you believe that the information we hold about you may be inaccurate or incomplete. We will correct and amend any such personal information and notify any third-party recipients of necessary changes.</p>
<ul style="list-style-type: none"> <li>• <b>The right to erasure</b></li> </ul>
<p>You can request that we delete your personal information. For example, where we no longer need your personal information for the original purpose we collected it.</p> <p>Whilst we will assess every request, this request is subject to legal and regulatory requirements that we are required to comply with.</p>
<ul style="list-style-type: none"> <li>• <b>The right to restriction of processing</b></li> </ul>
<p>Subject to the circumstances in which you exercise this right, you can request that we stop using your personal information, such as where you believe that we no longer need to use your personal information.</p>
<ul style="list-style-type: none"> <li>• <b>The right to data portability</b></li> </ul>
<p>Subject to the circumstances in which you exercise this right, you can request that we port across personal information you have provided to us to a third party in a commonly used and machine-readable format.</p>
<ul style="list-style-type: none"> <li>• <b>The right to object to marketing</b></li> </ul>
<p>We do not carry out any marketing activities using your personal information.</p>
<ul style="list-style-type: none"> <li>• <b>The right to object to processing</b></li> </ul>
<p>In certain circumstances, where we only process your personal data because we have a legitimate business need to do so, you have the right to object to our processing of your personal data.</p>
<ul style="list-style-type: none"> <li>• <b>Rights relating to automated decision-making</b></li> </ul>
<p>We do not currently carry out any automated decision-making. In the event that this changes, we will notify you and inform you about your rights relating to automated decision-making.</p>

- **The right to withdraw consent**

We do not rely on your consent to process your personal information, but in the event that this changes, we will inform you about your right to withdraw your consent.

- **The right to lodge a complaint with the ICO**

You have a right to complain to the Information Commissioner's Office if you believe that any use of your personal information by us is in breach of applicable data protection laws and/ or regulations. More information can be found on the Information Commissioner's Office website: <https://ico.org.uk/>  
This will not affect any other legal rights or remedies that you have.

## **8 .How we protect your information**

We will use all reasonable efforts to safeguard your personal data. We have put in place strict physical, electronic and managerial procedures to safeguard and secure the information we collect.

We put in place confidentiality clauses or confidentiality agreements (including data protection obligations) with our third-party service providers.

If you would like more information on how we protection your information please contact us using the details below.

## **9. Contact us**

You may contact our data protection officer if you have any questions about how we collect, store or use your personal information:

Data Protection Officer

JBW Group

9th Floor, Peninsular House

Monument Street

London EC3R 8LJ

[csl-privacy@collectservices.com](mailto:csl-privacy@collectservices.com)

## **10. Updates to this Privacy Policy**

We may need to make changes to this Privacy Policy periodically, for example, as the result of government regulation, new technologies, or other developments in data protection laws or privacy generally. Our most up to date Privacy Policy will always be shown on our website and will be signposted in all of our communications.

This Privacy Policy (version 7) was last updated on: 29 November 2018