



DATA PRIVACY NOTICE

1. What this document is

We wish to inform you of the new General Data Protection Regulation (GDPR) which comes into effect on the 25th May 2018.

This document is intended to provide you with important information about how we process your personal data this includes details of personal data we hold how we store it what we do with it why we hold it and how long we hold it for.

2. Introduction

Your personal data by definition: is data which by itself or with other data available to us can identify you.

We are Agnew Recovery Services Ltd, the data controllers. You can contact our GDPR Representative at:

Gillian Agnew
Agnew Recovery Services Ltd
49 Station Road, Doagh
BT39 0QT
gillian@agnewrecovery.com

3. The types of personal data we collect and use

Whether or not you become a client we'll use personal data for the purposes listed below. Most of the data we will collect directly from you, however data collected indirectly is also mentioned in this privacy notice.

The personal data we may use about you as a personal/business client may include:

- Full name and personal details including contact information (i.e. Business/home address and address history, email address, Home/Business/ Mobile telephone numbers)
- Date of birth/age (employees only)
- National Insurance Numbers (employees only)
- Financial details (e.g. Bank details)
- Medical Information (employees only)
- Insurance information (for contractual reasons)
- Voice recordings (for compliant and legal reasons)
- Photographic and utility billing (for money laundering requirements)
- Educational/employment details (for employees only)
- Personal data from other persons necessary to progress your Case. You must have authority to provide their personal data to us and share this data privacy statement with them beforehand together with what you have agreed to on their behalf.
- CCTV including number plate recognition (for security reasons)

4. Providing your personal data

We will tell you if providing personal data is optional, including if we ask for your consent to process it. You must provide your personal data so we can progress your case unless you are already a client and we hold your details.

5. How we keep your data safe

We protect your information with security measures under the laws that apply, we keep our computer, files and buildings secure.

6. How long we keep your data

We hold your data while you are a client and for a period of time after that in accordance with our legal and regulatory obligations. We do not hold it for longer than necessary.

7. Meeting our legal and regulatory obligations

To use your data lawfully we rely on one or more of the following Legal bases:

- Performance of contract
- Legal obligation
- Protecting the vital interests of you and others
- Public interest
- Our legitimate interests
- Your consent

To meet our regulatory and legal obligations we collect some of your personal data, verify it keep it up to date through regular checks and delete it once we no longer have to keep it. We may also gather information about you from third parties to help us meet our obligations. If you do not provide the data we need or help us keep it up to date, we may not be able to provide you with our full service.

8. Consent

Sometimes we need your consent to use your personal data for proactive requests for example with direct marketing, feedback requests etc. We may do this by phone, post, email, text, or through digital media. You can decide if you wish not receive these proactive requests, you have the right to opt out.

When we use sensitive personal data about you such as medical or biometric data we will ask for your consent. (Employees only). We will tell you what data we collect and what we use it for. You can remove your consent at any time by contacting us.

9. How we use your information

We use your information to:

- Service your contract with us
- Identify ways we can improve our services
- Protect both our interests
- Meet our legal and regulatory obligations

We do not use your data for marketing analysis and/or analysis of behavioural trends. We do not use technology to make decisions automatically about your personal profile.

10. Your data and Third Parties

Sometimes we share your data with third parties for example:

- Sub-contractors and other parties who help service your contract with us
- Other parties connected to your contract.
- Companies and persons providing a service for us (i.e. our IT supplier)
- Legal and professional advisors (i.e. our financial auditors)
- Fraud prevention agencies
- Government bodies in the UK (i.e. HMRC)
- Payment systems (i.e. Visa or mastercard)
- Courts
- Anyone else where we have your consent or as required by law.

11. Your Personal Rights

Your rights are as follows (noting that these rights don't apply in all circumstances and that data portability is only relevant from May 2018)

- the right to be informed about our processing of your personal data
- the right of access your personal data and see how we process it
- the right to rectification of your data if it is incorrect or inaccurate
- the right to erasure of your data (Known "as the right to be forgotten")
- the right to restrict processing of your personal data
- the right to data portability i.e. to move, copy or transfer your personal data
- the right to object to the processing of your personal data
- the right not to be subject to automated decision-making including profiling

You have the right to complain to the information commissioner's office. It has the enforcement powers and can investigate compliance with the data protection Law.

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