



Property Debt Collection Ltd

## **Privacy Policy – Customer/Debtor - Website**

## **Who we are**

Property Debt Collection Limited ('we', 'us', 'our') is a Company registered in England under Company No. 02788857. The Registered Office is Unit 3 Gateway Mews, Ringway Bounds Green, London, N11 2UT. This privacy policy sets out how Property Debt Collection Limited uses and protects any information that you give us when you use this website.

We act as a data controller and a data processor (dependent on the type of data we hold and the purpose of the processing) in line with the definitions within the relevant data protection laws and regulations applicable in the UK and in the European Union (**EU**), including the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

[You should read through this Privacy Policy to fully understand the basis upon which we collect your personal data, how we use it, where we store it and to whom it is disclosed.](#)

## **Commitment to Privacy**

**We are committed to protecting your personal data and right to privacy. We will always keep your personal data safe and comply with applicable data protection legislation from time to time in place.**

Your right to privacy is important to us, and we are committed to protecting your privacy and ensuring that we handle your personal data correctly and in accordance with data protection law. This Privacy Policy explains our data processing practices in relation to personal information and data which we collect, store and retain.

We are keen to strike a fair balance between your personal privacy and ensuring that you obtain full market value from the internet and other products and services we may be able to offer you.

When we ask you to provide certain information by which you can be identified, you can be assured that it will only be used in accordance with this policy statement.

We may change this policy from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes. This policy is effective from 25<sup>th</sup> May 2018.

[You have the right to object to us processing your personal data for marketing purposes, which we may do with your consent, and also to processing which is carried out in our mutual legitimate interests. For more information, see the section "Your Rights" below.](#)

## **What personal data do we collect about you?**

We do not collect personal data through our website, but we do use 'cookies'. See the section headed 'Use of cookies' below.

We have identified the types of data we collect, based on the type of client or customer we deal with and on specific activities, as follows:

### **Customer/Debtor Information**

**Acting as: Data Processor on behalf of our client**

**Type of data held:** includes Name, Property Address, Correspondence Address, Telephone Number, Email addresses, and Mortgagee details if applicable. Payment plan cheques if applicable.

**Why the data is held and who it is shared with:** Most of the debtors we deal with are individuals. On occasion they are Limited companies. Debtor information is provided to us by our clients at the point of instruction. Our clients are entitled to seek to recover the debt under the terms of the lease/transfer (contract) and to refer the matter to a third party such as a debt collection agency/solicitor to act on their behalf. In order to do so, they provide customer/debtor information to enable us to comply with the pre-action protocol and make contact with the debtor.

Where the arrears are over £350 and there is a mortgagee and /or a party listed on the charges register held on H.M Land Registry Title document, we will share the Debtors information with that third party to notify them their security is at risk.

We may utilise a third party provider such as TransUnion International UK Limited or LexisNexis Risk Solutions UK Ltd in order to conduct a trace to locate additional contact information for the debtor.

Where necessary the data may be shared with PDC Law to initiate legal proceedings and/or other Companies (Indemnity Legal UK Ltd, PCS Legal, Legal Alliance UK Ltd and Legal Indemnity UK Ltd) to prepare and serve the relevant Legal Notices required.

It is important to note any cheque payment plans we receive are stored in a secure locked cabinet with access limited to the accounts team.

Any payments we accept by card are processed via Elavon Digital Europe Limited trading as Opayo (formerly known as SAGEPAY) payment gateway which ensures we are PCI DSS Compliant.

Some information is shared with our accountants who carry out the firm's bookkeeping functions.

We also utilise a third-party provider to carry out our letter printing and post service, PHD Mail Limited. We issue letters to them via a secure portal (accessed via unique user logins and passwords) which, once received, they then print, sort into envelopes and post.

Their accreditations are as follows:

- for data management & security: ISO/IEC 27001:2005
- for quality: ISO 9001:2008
- for the environment ISO 14001:2004.
- for Data Protection Registration they are registered with the Information Commissioners Office.
- for financial documents they are APACS accredited.

**We have identified we are able to process this data for the following reasons:**

**We are acting as a Data Processor in line with our clients' instructions:**

**Legitimate Interests:** the processing is necessary in our pursuit of our business interests, but only where those interests are not outweighed by the rights and freedoms of the individual data subjects concerned, and where such processing would be within the reasonable expectations of the data subject.

**How long we keep your personal data for**

Information will be stored only for as long as needed or required by statute and will be disposed of appropriately. In reality, most relevant information will be kept for a

maximum period of 6 years in accordance with the Limitation Act 1980 Section 9 (1). Audio recordings of telephone calls will only be stored up to a maximum period of 6 months.

### **Who we share your personal data with**

We may provide your personal data to third party suppliers and processors as instructed by our client and as identified in the relevant sections listed above. We share your personal data with third parties who:

- communicate with you on our behalf via email;

The personal data we collect from you will not, as standard, be processed outside the European Union (**EU**). Such destinations may not have laws which protect your personal data to the same extent as within the EU. However, should you provide our client, us and/or HM Land Registry with an email address or correspondence address that is outside of the EEA we will process that data in accordance with Article 49 (1) (a) (b) of the GDPR. We have obligations to ensure that your personal data processed by us or by our suppliers operating outside the EU is treated securely and is protected against unauthorised access, loss or destruction, unlawful processing and any processing which is inconsistent with the purposes set out in this Notice.

In addition, we may disclose your personal data:

- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to protect the rights, property or safety of our business, our customers or others. This includes, in specific cases, exchanging information with other companies and organisations for the purposes of fraud protection; and
- to successors in title or replacement operators of all or part of our respective businesses.

### **Your rights**

By law, you have a number of rights when it comes to your personal data. Further information and advice about your rights can be obtained from the data protection regulator, The Information Commissioners Office (ICO).

<b>Rights</b>	<b>What does this mean?</b>
1. The right to be informed	You have the right to be provided with clear, transparent and easily understandable information about how we use your personal data and your rights. This is why we're providing you with the information in this Notice.
2. The right of access	You have the right to obtain access to your personal data (if we're processing it), and certain other information (similar to that provided in this Privacy Notice).  This is so you're aware and can check that we're using your personal data in accordance with data protection law.
3. The right to rectification	You are entitled to have your personal data corrected if it's inaccurate or incomplete.

4. The right to erasure	This is also known as 'the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of your personal data where there's no compelling reason for us to keep using it. This is not a general right to erasure; there are exceptions.
5. The right to restrict processing	You have rights to 'block' or suppress further use of your personal data. When processing is restricted, we can still store your personal data, but may not use it further. We keep lists of people who have asked for further use of their personal data to be 'blocked' to make sure the restriction is respected in future.
6. The right to data portability	You have rights to obtain and reuse your personal data for your own purposes across different services. For example, if you decide to switch to a new provider, this enables you to move, copy or transfer your information easily between our IT systems and theirs safely and securely, without affecting its usability.
7. The right to object to processing	You have the right to object to processing for direct marketing (which we do only with your consent) and also to processing which is carried out for the purposes of our legitimate interests.
8. The right to lodge a complaint	You have the right to lodge a complaint about the way we handle or process your personal data with your national data protection regulator.
9. The right to withdraw consent	If you have given your consent to anything we do with your personal data, you have the right to withdraw your consent at any time (although if you do so, it does not mean that anything we have done with your personal data with your consent up to that point is unlawful). This includes your right to withdraw consent to us using your personal data for marketing purposes.

Please see the section titled Requests to Us, below, for more information on how we will handle your requests to us.

### Use of cookies

Cookies are small files that collect anonymous information about how visitors use a website, which is then used to help improve the site. The information collected can include the number of site visitors, where visitors come to the site from and the pages they visited.

We use traffic log cookies on this web site which are totally anonymous, and are used purely to analyse how users navigate around our site. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs.

A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. Please note that by deleting our cookies or disabling future cookies, this may prevent you from taking full advantage of the website, so you may not be able to access certain areas or features of our site. The information collected

includes the number of site visitors, where visitors come to the site from and the pages they visited. For further information visit [www.aboutcookies.org](http://www.aboutcookies.org).

### **Other websites**

Our website may contain links to other websites which are outside the control of Property Debt Collection Limited and are not covered by this Privacy Policy. If you access other websites using the links provided, the operators of these websites may collect information from you which will be used by them in accordance with their privacy policy, which may be different to the privacy policy of Property Debt Collection Limited. You should exercise caution and look at the privacy statement applicable to the website in question.

### **Requests to Us (Subject Access Requests)**

We will consider and act on any request and provide information free of charge, and you have a right to a copy of and details of the personal data held about you as detailed in Your Rights above. We will respond to Subject Access Requests within 1 calendar month. No charge will be levied for this service unless a request is except where your requests are manifestly unfounded or excessive (in particular because of their repetitive nature) in which case we may charge a reasonable fee (taking into account the administrative costs of providing the information or communication, or taking the action requested), or refuse to act on the request.

The requested information will be provided in permanent or electronic/portable form. Please consider your request responsibly before submitting it. We'll respond as soon as we can. Generally, this will be within one month from when we receive your request but, if the request is going to take longer to deal with, we'll come back to you and let you know.

Subject Access Requests can be made by contacting us.

### **Contacting us**

If you need to contact us to exercise any of your rights in relation to data protection as set out above please send your request to:

Kat Bye  
Property Debt Collection Limited  
Sherwood House  
5 Bluecoats  
Hertford  
Hertfordshire  
SG11 1PB

Or by email to: [customersatisfaction@propertydebt.co.uk](mailto:customersatisfaction@propertydebt.co.uk)

Or by telephone: 01992 449 403

Once we have received communication from you we will log your request on our system. Consider your request, take the action deemed necessary and confirm in writing, the action taken within one month of the date we receive your request.

### **Making a Complaint**

If after contacting us to exercise any of your rights in relation to data protection you are dissatisfied, you have the right to complain to the Information Commissioners Office (ICO). Their details are below:

Address:

Customer Contact  
Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
SK9 5AF

Website: <https://ico.org.uk/media/report-a-concern/forms/1523/information-handling-form.pdf>

Telephone: 0303 123 1113