

# Privacy Policy

DIRECT TELECOMMUNICATIONS (LONDON) LIMITED (“DTLL”). We are committed to protecting and respecting the privacy of everyone who visits our Site (the “Site”). Our Privacy Policy (the “Policy”) sets out the basis on which any personal information we collect from you, or that you provide to us, will be processed by us and properly safeguarded in a manner consistent with your rights and our obligations under applicable laws and regulations relating to privacy and the protection of personal data.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. Your acceptance of our Privacy Policy is deemed to occur upon your first use of our Site. If you do not accept and agree with this Privacy Policy, you must stop using our Site immediately.

## 1. Information about us

1. Our nominated representative for the purposes of the DPA is David Henning.
2. Our Site is operated by DTLL, a limited company registered in England under company number 2964271, Our VAT number is 649138611.

## 2. What this policy covers

1. This Privacy Policy applies only to your use of our Site. It does not extend to any websites that are linked to or from our Site (whether we provide those links or whether they are shared by other users). We have no control over how your data is collected, stored or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

## 3. Information we may collect from you

1. We may collect your personal information through various means, including via our Site
2. Other data may be collected through email or other electronic correspondence, by telephone, by direct contact, or if you voluntarily submit it, except where we are required by law to collect personal data (for example, to comply with money laundering regulations) in which case the provision of personal data is mandatory. We may not be able to provide the services you request where you fail to provide us with such required information.
3. We only collect information that is relevant to our services and necessary to identify you. We may also ask you for information when you report a problem with our Site.
4. Some or all the following data may be collected about you:
  - Name;
  - Date of birth;
  - Gender;
  - Business/company name;

- Job title;
- Profession;
- Visual and audio images of you through our use of Body Worn Video and audio recording equipment;
- Contact information such as email addresses and telephone numbers;
- Demographic information such as postcode and preferences;
- Financial information such as credit / debit card numbers;
- Personal data collected arising out of the debt collection and enforcement process (some of which may include sensitive data related to the customer or other third parties), such as information on the physical or mental health or condition of the debtor and details of incidents occurring during debt enforcement visits;
- IP address (automatically collected);
- Web browser type and version (automatically collected);
- Operating system (automatically collected);
- A list of URLs starting with a referring site, your activity on our Site, and the site you exit to (automatically collected);
- LinkedIn™, Facebook™ or Twitter™ profile names;
- Caller line identification;
- Complainants and other individuals in relation to a judicial service complaint or enquiry;
- People who use our services, e.g. who subscribe to our newsletter or request a publication from us;
- Information that you provide as a job applicant through our online job application facility, e.g. name and contact details, curriculum vitae, covering letter, references, equality monitoring information;
- Vehicle registration keeper details; and
- Banking details that you have permitted us to use on your behalf.

#### 4. Sensitive personal data

1. The Act defines certain personal data as ‘sensitive’ such as personal data regarding your ethnic origin, physical health and mental health. We are required to understand whether the people that we deal with could be regarded as vulnerable and this may involve collecting and using sensitive personal data. We may, for debt collection purposes, therefore ask you for some sensitive details or you may voluntarily give such personal data to us. We will only use this personal data for debt collection purposes and we will obtain your consent to process this data. We may share any of your sensitive personal data with our client to ensure your case is managed appropriately and other members of DTLL for debt collection purposes only. Any sharing of your sensitive personal data with clients will be based on your consent or if we are required or permitted to do so under the Data Protection Act 1998.

#### 5. How we use this information

1. All personal information is stored securely in accordance with the principles of the Data Protection Act 1998. For more details on security, see section 6.
2. We use your data to provide the best possible services to you and to fulfil our legal obligations to our staff and enforcement agents acting on our behalf. This includes:
  1. providing and managing your access to our Site;
  2. personalising and tailoring your experience on our Site according to your interests or to make it more user friendly;
  3. supplying our services to you on behalf of our clients;
  4. personalising and tailoring our services for you;
  5. responding to communications from you, including any complaints;
  6. enabling payments to be made by debtors on behalf of our clients;
  7. sharing information about incidents occurring at the doorstep to protect the health and safety of the individuals involved with debt enforcement visits; and
  8. collecting information (where appropriate) on the vulnerability of individual customers who we are collecting or enforcing debts against, to ensure that they are treated fairly.
3. With your permission and/or where permitted by law, we may also use your data for marketing purposes which may include contacting you by email, telephone and/or post with information, news and offers on our services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that we fully protect your rights and comply with our obligations under the Data Protection Act 1998 and the Privacy and Electronic Communications (EC Directive) Regulations 2003, as amended in 2004, 2011 and 2015.
4. Calling our Contact Centre helpline may result in our collection of Calling Line Identification information. Calls are recorded for training purposes and for the analysis and management of internal staff performance. Call recordings may be reviewed also as part of a complaint investigation. The use of this information assists with the improvement of our efficiency and effectiveness.

## 6. How and where information is stored

1. We only keep your data for as long as we need to use it as described in section 4, and/or for as long as we have your permission to keep it.
2. Your data will only be stored within the European Economic Area (“the EEA”) in order that we can remain in compliance with the UK Data Protection Act (the EEA consists of all EU member states, plus Norway, Iceland and Liechtenstein).
3. Data security is of immense importance to us, and to protect your data we have put in place suitable physical, electronic and managerial procedures to safeguard and secure data collected through our Site.
4. Notwithstanding the security measures that we take, it is important to remember that the transmission of data via the internet may not be completely secure and that you are advised to take suitable precautions when transmitting to us via the internet.

## 7. Disclosure of your information

1. We may share your data with other companies
2. We may sometimes contract with third parties to supply services to you on our behalf. These may include payment processing, correspondence management and mailing. In some cases, the third parties may require access to some or all your data. Where any of your data is required for such a purpose, we will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, our obligations, and the obligations of the third party under the law.
3. We may also disclose your personal information to third parties if we expand or reduce all or part of our business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets. If DTLL or substantially all its assets are acquired by a third party, personal data held by it about its customers and website users will be one of the transferred assets and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use the data for the purposes for which it was originally collected by us.
4. We may compile statistics about the use of our Site including data on traffic, usage patterns, user numbers, sales and other information. All such data will be anonymised and will not include any personally identifying information. We may, from time to time, share such data with third parties such as prospective investors, affiliates, partners and advertisers. Data will only be shared and used within the bounds of the law.
5. In certain circumstances we may be legally required to share certain data held by us, which may include your personal information, for example, where we are involved in legal proceedings, where we are complying with the requirements of legislation, a court order, or a governmental authority. We do not require any further consent from you to share your data in such circumstances and will comply, as required, with any legally binding request that is made of us.
6. We may share your data in pursuing an interest that corresponds with a public interest or a third party's interest. This may include situations where we are required to go beyond its specific legal obligations set in laws and regulations to assist law enforcement or private stakeholders in their efforts to combat illegal activities, such as money laundering, fraud prevention or misuse of services. However, the use of personal data in such circumstances will be restricted to data which is relevant to our services and necessary to identify you.

## 8. Complaints

1. When we investigate a complaint, we may need to share personal information with the organisation you have an outstanding debt with and with other relevant bodies (e.g. the Civil Enforcement Association to adjudicate on disputed complaints).

2. Upon receipt of a complaint, we open a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint.
3. We will only use the personal information we collect to process the complaint and to check on the level of service we provide. We may compile and publish statistics showing information such as the number of complaints we receive, but not in a form which identifies anyone.
4. We are usually required to disclose the complainant's identity to whoever the complaint is about. This is inevitable where, for example, the accuracy of a person's record is in dispute. If a complainant does not want information identifying him or her to be disclosed, we aim to respect that. However, it may not always be possible to handle a complaint on an anonymous basis.
5. We will keep personal information contained in complaint files in line with our retention policy. This means that information relating to a complaint will be retained for up to six years from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.
6. Similarly, where enquiries are submitted to us, we will only use the information supplied to us to deal with the enquiry and any subsequent issues and to check on the level of service we provide.
7. When we take enforcement action against someone, we may publish the identity of the defendant in our Annual Report or elsewhere. We do not usually identify any complainants unless the details have already been made public.
8. If you are not satisfied with the way we have sought to redress your complaint, or if you wish to seek further advice about the use of your data, you are within your right to contact the ICO for a further determination.

## 9. Controlling your personal information

1. When you submit information via our Site, you may be given options to restrict our use of your data. We aim to give you strong controls on our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from us, which you may do by unsubscribing using the links provided in our emails and at the point of providing your details).
2. You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service the Corporate Telephone Preference Service and the Mailing Preference Service. These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

## 10. Your right to withhold information

1. You may access certain areas of our Site without providing any data at all. However, to use all features and functions available on our Site you may be required to submit or allow for the collection of certain data.

2. You may restrict your internet browser's use of Cookies. For more information, see section 13

#### 11. Your right to access information

1. You have the legal right to request details of any personal information we hold about you under the Data Protection Act 1998. If you would like a copy of the information held on you, please write to us using the Contact Us page.

#### 12. Ensuring the accuracy of your information

1. If you believe that any information we are holding on you is incorrect or incomplete, please contact us as soon as possible. We will promptly correct or remove any information that is incorrect.
2. You have the right to close your account and request that your personal information be removed from our website or other records. Upon the closure of your account we are not obliged to retain your information and may delete any or all your account information without liability.
3. If you request a change of details and/ or account closure, we may retain residual information about you in our backup and/or archival copies of our database. This will be deleted in accordance with our data retention policy.

#### 13. Protecting your information

1. 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 online.
2. You should note that when using the Site and our related services, your information may travel through third party infrastructures that are not under our control. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.
3. We use elevated level encryption software to prevent access to your personal information. Unfortunately, the internet is never a completely secure environment. Therefore, we cannot guarantee that hackers or unauthorised personnel will not gain access to your personal information despite our best efforts.
4. We have put in place confidentiality clauses or confidentiality agreements (including data protection obligations) with our third-party service providers.

#### 14. Changes to our Privacy Policy

1. We may change this Privacy Policy as we may deem necessary from time to time, or as may be required by law. Any changes will be immediately posted on our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of our Site following the alterations.
2. We recommend that you check this page regularly to keep up to date.