

BACKGROUND

JTR Collections understands that your privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone who visits this website, www.jtrcollections.co.uk ("Our Site") and (subject to the limited exceptions in section 6, below). Any personal data we collect will only be used as permitted by law.

Please read this Privacy Policy carefully and ensure that you understand 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. Definitions and Interpretation

In this Policy, the following terms shall have the following meanings:

"personal data"	means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to Us via Our Site. This definition shall, where applicable, incorporate the definitions provided in the EU Regulation 2016/679 – the General Data Protection Regulation ("GDPR"); and
"We/Us/Our"	means JTR Collections, a limited company registered in England under company number 06763357.

2. Information About Us

- 2.1 Our Site is owned and operated by JTR Collections, a limited company registered in England under company number 06763357.
- 2.2 Our VAT number is 101 8313 64.
- 2.3 Our Data Protection Manager is Michael Line, and can be contacted by email at info@jtrcollections.co.uk, by telephone on 01933 625486, or by post at PO Box 7672, Wellingborough, NN8 9GW.
- 2.4 We are a member of the Certificated Enforcement Agents Association.

3. What Does This Policy Cover?

This Privacy Policy applies to how we collect, process and store data relating to individuals who we are contacting in relation to their debt.

4. Your Rights

- 4.1 **Where we are processing your data under a legal obligation do not need your consent (see point 7.1).** As a data subject, you have the following rights under the GDPR, which this Policy and Our use of personal data have been designed to uphold:
 - 4.1.1 The right to be informed about Our collection and use of personal data;

- 4.1.2 The right of access to the personal data We hold about you (see section 12);
 - 4.1.3 The right to rectification if any personal data We hold about you is inaccurate or incomplete (please contact Us using the details in section 14);
 - 4.1.4 The right to restrict (i.e. prevent) the processing of your personal data;
 - 4.1.5 Rights with respect to automated decision making and profiling.
- 4.2 You **do not** have the following rights under a legal obligation:
- 4.2.1 The right to be forgotten – i.e. the right to ask Us to delete any personal data We hold about you;
 - 4.2.2 The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);
 - 4.2.3 The right to object to Us using your personal data for particular purposes; and
- 4.3 If you have any cause for complaint about Our use of your personal data, please contact Us using the details provided in section 14 and We will do Our best to solve the problem for you. If We are unable to help, you also have the right to lodge a complaint with the UK’s supervisory authority, the Information Commissioner’s Office.
- 4.4 For further information about your rights, please contact the Information Commissioner’s Office or your local Citizens Advice Bureau.

5. Lawful, Fair, and Transparent Data Processing

- 5.1 The GDPR seeks to ensure that personal data is processed lawfully, fairly, and transparently, without adversely affecting the rights of the data subject. The GDPR states that processing of personal data shall be lawful if the following applies:
- 5.1.1 The processing is necessary for compliance with a legal obligation to which the data controller is subject;
- 5.2 We will be given personal data by our clients and other relevant sources in order to fulfil our role in the collection of local authority revenue under the Local Government Finance Act 1988, the Local Government Finance Act 1992, the Local Government Act 2003, the Housing Benefit Regulations 2006 and the Local Government Act 1972 and other relevant legislation.
- 5.3 As some of the personal data in question is “special category data” (also known as “sensitive personal data”) (for example, data concerning the data subject’s race, ethnicity, politics, religion, trade union membership, genetics, biometrics (if used for ID purposes), health, sex life, or sexual orientation), the following conditions must be met:
- 5.3.1 The processing is necessary for the conduct of legal claims or whenever courts are acting in their judicial capacity;

6. What Data Do We Collect?

We may collect some or all of the following personal data and sensitive personal data:

- 6.1 name;
- 6.2 address;
- 6.3 Telephone number;
- 6.4 email address;
- 6.5 Bank details;
- 6.6 Credit history
- 6.7 Medical information;
- 6.8 Employment data;
- 6.9 Benefit award information;
- 6.10 Criminal convictions;

7. **How Do We Use Your Data?**

- 7.1 We will be given personal data by our clients in relation its legal obligations to collect monies which arise variously from the Local Government Finance Act 1988, the Local Government Finance Act 1992, the Local Government Act 2003, the Housing Benefit Regulations 2006 and the Local Government Act 1972. The Processing of the Personal Data will also enable the Client to assess the ability of debtors to pay their debts under General Data Protection Regulation (GDPR) (EU) 2016/679, Article 6(1) (c) lawful basis of legal obligation.
- 7.2 We will be given personal data by our clients in order to fulfil our role in the collection of employment bonds. This is being processed by Us under the General Data Protection Regulation (GDPR) (EU) 2016/679, Article 6(1)(e) lawful basis of legitimate interest. A Legitimate Interest Assessment has been carried out and the impact on rights and freedoms of individuals is not deemed unwarranted.
- 7.3 Any personal data will be processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with Our obligations and safeguard your rights under the GDPR at all times. For more details on security see section 7, below.
- 7.4 If you contact Us and We obtain your personal details from your email, We may use them as follows:
 - 7.4.1 To reply to your email.

8. **How and Where Do We Store Your Data?**

- 8.1 We only keep your personal data for as long as We need to in order to use it as described above in section 6.
- 8.2 Your data will only be stored within the European Economic Area (“the EEA”) (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein).
- 8.3 Data security is very important to Us, and to protect your data We have taken suitable measures to safeguard and secure data collected through Our Site.

9. **Do We Share Your Data?**

- 9.1 In certain circumstances, We may be legally required to share certain data

held by Us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with legal obligations, a court order, or a governmental authority.

9.2 The third party data processors used by Us and listed below are within the EEA and under the GDPR including:

9.2.1 For storing your data we use a secure cloud based system called Civica. Civica is certified compliant to ISO 9001, ISO 14001, ISO 22301 & ISO 27001. All data transmissions are via HTTPS for office access (this includes SMS transmission), SFTP for reporting/data transfers and where data is retained on remote worker devices, this is stored in an encrypted format. All of their systems are protected by industry standard security policies and practices.

9.2.2 For processing payments we use Worldpay whose payment processing systems are compliant with PCI DSS industry security standards.

9.2.3 For Dialler, Text, Voicemail Services, phone and email provider we use Telsolutions who use a Tier 1 data centre to ensure security.

9.2.4 For the security of our Enforcement Agents we use Body Wear Cameras supplied by Edesix Wearable Security, all data is uploaded directly onto our own secure servers.

9.2.5 For outbound calling we use Unity Collections Ltd, please see their privacy policy: <https://team-unity.co.uk/unity-collections/privacy-policy/>

9.2.6 We obtain data from TransUnion on credit risk and affordability information, please see their privacy policy for more information (<https://www.transunion.co.uk/legal-information/bureau-privacy-notice>)

10. What Happens If Our Business Changes Hands?

10.1 We may, from time to time, expand or reduce Our business and this may involve the sale and/or the transfer of control of all or part of Our business. Any personal data that you have provided will, where it is relevant to any part of Our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use that data only for the same purposes for which it was originally collected by Us.

10.2 In the event that any of your data is to be transferred in such a manner, you will not be contacted in advance and informed of the changes.

11. How Can You Access Your Data?

You have the right to ask for a copy of any of your personal data held by Us (where such data is held). Under the GDPR, no fee is payable and We will provide any and all information in response to your request free of charge. Please contact Us for more details at info@jtrcollections.co.uk, or using the contact details below in section 12.

12. Contacting Us

If you have any questions about Our Site or this Privacy Policy, please contact Us by email at info@jtrcollections.co.uk, by telephone on 01933 625486, or by post at PO Box 7672, Wellingborough, NN8 9GW. Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you (as under section 8, above).

13. **Changes to Our Privacy Policy**

This policy was last updated on 18th October 2019. We may change this Privacy Policy from time to time (for example, if the law changes). 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. We recommend that you check this page regularly to keep up-to-date.