

**Insurance Collections  
Bureau Ltd  
Privacy Policy  
May 2018\_V1.1**

## **BACKGROUND:**

Insurance Collections Bureau Limited understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all those people we interact with and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

### **1. Information About Us.**

Insurance Collections Bureau Limited.

Registered in England under company number: 05426923

Registered address:

Weltech House, Ridgeway, Welwyn Garden City, Herts AL7 2AA

Data Protection Officer: Alan Smith / [dpo@icbureau.co.uk](mailto:dpo@icbureau.co.uk)

We are a debt collection agency regulated by FCA under licence: 704300

We are registered with the Information Commissioner's Office (ICO) under registration reference: Z9052649.

### **2. What Does This Notice Cover?**

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

### **3. What is Personal Data?**

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

### **4. What Are My Rights?**

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you all you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 11.
- b) The right to access the personal data we hold about you. Part 10 will tell you how to do this.

- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 11 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 11 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that you can ask us for a copy of your personal data held by us to re-use with another service provider or business in many cases.
- h) Rights relating to automated decision-making and profiling.
- i) For more information about our use of your personal data see the details provided in Part 11.

Further information about your rights can also be obtained from the Information Commissioner's Office (<https://ico.org.uk/>) or your local Citizens Advice Bureau.

Please note that in certain circumstances, some of the Rights would not apply due to there being a legitimate interest which takes precedent. An example of this would be the right to be forgotten. This is not possible without good reason and the express consent from our Client.

If you are not happy with our response you have the right to make a complaint to the Information Commissioner's Office (ICO)

## **5. What Personal Data Do You Collect?**

We may hold and retain personal data such as:

- Name.
- Address.
- Email address.
- Telephone numbers.
- Business name.
- Job title.
- Profession.
- Payment information.
- Voicemail messages.
- Call recordings.
- Call data records.
- Insurance related information – Vehicle registration – start and end date of insurance policies.
- The amount owed to our client.
- Authorised user/s information (name, contact details and relationship with account holder)

- Sensitive Personal Data
  - The Act defines certain personal data as 'sensitive' and this may include for example personal data regarding your ethnic origin, physical health and mental health.
  - In order to carry out our role, we are required by the FCA to understand the circumstances of the people that we are contacting and in particular we also need to establish whether people that we deal with could be regarded as vulnerable. This may involve collecting and using sensitive personal data. In certain circumstances then we may, for debt collection purposes, therefore ask you for some sensitive details and we would then ask for your consent to store that information. Alternatively, you may voluntarily give such personal data to us.
  - We will only use this personal data for debt collection purposes and would only share such sensitive personal data with those other members of the Insurance Collections Bureau and our clients who need to be aware of such information for debt collection purposes only. Any sharing of your sensitive personal data with clients will be on the basis of your explicit consent.

Your personal data will be provided to us by the Data Controller i.e. the company who the money is owed to, however we may also obtain your data from 3<sup>rd</sup> party tracing agents, who are also compliant with GDPR legislation.

## **6. How Do You Use My Personal Data?**

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with the data controller i.e. the company with whom you owe money, or because it is in our legitimate business interests to use it.

Acting as data processors on behalf of the data controller your personal data will be used for the following purposes:

- Verifying your identity, ensuring that we only share information with you (the Account Holder)
- Recovery of monies owed by you on behalf of its clients (Data Controller)
- Updating and managing your account.
- Communicating with you. This may include responding to emails, text messages or calls from you.
- Provide updates to our client

At no point will data be passed to a third party for any purpose other than to fulfil the contract entered into between ICB and its client.

If any of your personal data is required by a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law.

We contract with third parties (as described above), and those third parties may sometimes contract with third parties (as described above) that are located outside of the European Economic Area. If any personal data is transferred to a third party outside of the EEA, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the GDPR, as explained above in Part 8.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

## **7. Legitimate Interest Assessment**

Processing of data will be lawful if it is necessary for the purposes of the legitimate interests pursued by the Controller or ourselves as a Debt Collection Agency (Data Processor).

The Data Collector (our Client) will pass your details to us as the Data Processor in the interests of collecting outstanding arrears owed by yourself. It is therefore in our legitimate interest to process your data, whilst ensuring that we do not cause unjustified harm to your interests.

Due to our legitimate interests in your data, this enables our consent to contact you via different media to collect any outstanding monies.

## 8. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

Data Ref.	Type of Data	Purpose of Data	Retention Period	Availability
Call Recordings	Audio File	For compliance, training and monitoring purposes.	At our clients request, during the contract period or 1 year after contract end.	As Per Retention Period.
Customer Emails	Text	Communication with Customer.	At our clients request, during the contract period or 1 year after contract end.	As Per Retention Period.
Letters	Text	Inbound correspondence	At our clients request, during the contract period or 1 year after contract end.	As Per Retention Period.
Diary Notes	Text	Keeping a record of the account activity.	At our clients request, during the contract period or 1 year after contract end.	
Financial Transactions	Text	To record payments received and account to client accordingly.	At our clients request, during the contract period or 1 year after contract end.	
Customer Contact Information	Text	Contact details are retained for communication between parties.	At our clients request, during the contract period or 1 year after contract end.	As Per Retention Period.
Voicemail	Audio File	Operation of day to day support services.	28 Days	As Per Retention Period.

## 9. How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a subject access request (SAR).

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 11. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. We will also require you to provide identification in order to prove you are the Data Subject.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will attempt to respond to your subject access request within thirty days of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

## 10. How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of Data Protection Officer):

Email address: [dpo@icbureau.co.uk](mailto:dpo@icbureau.co.uk)

Telephone number: 01707 566053 (option 2).

Postal Address: Insurance Collections Bureau Ltd. Weltech Hs, Ridgeway, Welwyn Garden City, Herts AL7 2AA

## 11. Changes to this Privacy Notice

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available to download from our website [www.insurancecollectionsbureau.co.uk](http://www.insurancecollectionsbureau.co.uk).

## 12. Implementation of Policy

This Policy shall be deemed effective as of 25/05/2018. No part of this Policy shall have retroactive effect and shall thus apply only to matters occurring on or after this date.

This Policy has been approved and authorised by:

**Name:** Alan Smith  
**Position:** Data Protection Officer  
**Date:** 24<sup>th</sup> May 2018  
**Due for Review by:** 24<sup>th</sup> May 2019

Version Control			
Date	Version Number	Author	Comments
8th May 2018	1.1	Alan Smith	Initial version