

# Privacy Policy

**dataTrace UK is committed to protecting and safeguarding your data. As part of this commitment, we have this Privacy Notices for all persons for whom dataTrace UK will hold personal information, to comply with the UK General Data Protection Regulation (GDPR) and the Data Protection Act 2018.**

When it comes to your privacy, we follow 3 main principles:

## **Simple.**

We want to make it simple for you to understand how we use your personal data. We aim to use easy to understand language to describe our privacy policy and processes to help you make informed choices.

## **Transparent**

We want to be transparent about the personal information we collect, why we collect it and how we process it.

## **Control**

We give you control over the Personal Information you provide to us. We let you choose how and when it is used, shared, kept or deleted.

Our full Privacy Statement is below, and we suggest you take the time to read and understand it.

## **Data Processor:**

In relation to the services, we provide to our clients, our clients are the Data Controller, and dataTrace UK are the Data Processors responsible for storing and protecting the personal data that our clients send to us — and that information we ourselves obtain — relating to Data Subjects.

We have appointed a Data Protection Officer who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, you can contact the Data Protection Officer by using the contact details set out below.

## **Contact Details:**

Email Address: [compliance@datatraceuk.com](mailto:compliance@datatraceuk.com)

**Postal address:**

dataTrace UK Ltd, Compass House, Waterside, Hanbury Road, Bromsgrove B60 4FD

A Data Subject has the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

**What Data is held?**

The personal data provided by our clients that we may need to store about Data Subjects includes Full name, address, Date of Birth, Debt Balances Dates of Occupation. In addition, during the course of our service dataTrace UK may obtain data of Enquiry Subject's new addresses, previous addresses, telephone numbers, family members, employers' details, Bankruptcy/CCJ information, Voters Roll listings, Property Ownership, neighbours, plus financial/credit information including movement information, numbers of open accounts and account types. dataTrace UK also record all telephone calls both inbound and outbound and may keep a record of a conversation with a Data Subject.

**Where will this information come from?**

dataTrace UK will obtain information via telephonic, HM Land Registry and historic voters roll records. In addition, dataTrace UK obtains information via the three UK Credit Reference Agencies, Callcredit Ltd (now Transunion,) Experian Ltd and Equifax Ltd.

You can ask the Credit Reference Agencies, details below, for a copy of your credit file, they may charge a fee for this service. If there is anything incorrect on your credit file, you can ask them to add a Notice of Correction:

Experian Limited  
Customer Support Centre  
PO Box 9000  
Nottingham  
NG80 7WF

Tel: 0344 481 0800 or 0800 013 8888  
Email: [consumer.helpservice@uk.experian.com](mailto:consumer.helpservice@uk.experian.com)  
Web address: [experian.co.uk/](http://experian.co.uk/)

Equifax Limited  
Customer Service Centre

PO Box 10036  
Leicester  
LE3 4FS

Tel: 0333 321 4043 or 0800 014 2955

Web address: [www.equifax.co.uk](http://www.equifax.co.uk)

Callcredit Limited (now Transunion Ltd)  
Consumer Services Team  
PO Box 491  
Leeds  
LS3 1WZ

Tel: 0330 024 7574

Email: [consumer@callcreditgroup.com](mailto:consumer@callcreditgroup.com)

Web address: <http://callcredit.co.uk/consumer-solutions/contact-us>

To aid transparency, these organisations have issued a joint notice concerning the credit reference data they hold, known as the "Credit Reference Agency Information Notice" ("CRAIN.") This notice may be found at:

<https://www.callcredit.co.uk/crain>

In addition, Callcredit/Transunion have issued a further notice which may be found at:

<https://www.callcredit.co.uk/legal-information/bureau-privacy-notice>

### **Why do dataTrace UK need this data?**

dataTrace UK needs this information to perform the services of a Tracing and Debt Collection Agency. Specifically, the information will be used to establish and confirm the identity of Data subjects, to trace their address movements and current contact details and establish their financial means to support our client's Debt Collection activities. We may also need the information to locate and contact Data Subjects for Asset Reunification purposes.

### **Legal Basis:**

The information will be collected and processed on the legal basis of "Legitimate Interest" and we have conducted the appropriated Legitimate Impact Assessment to support this.

**Activity:**

Tracing individuals who have absconded or whose whereabouts are unknown on behalf of Customers who need to reconnect with an individual or Business.

**Lawful Basis:**

Article 6(1)(f) UK GDPR – Legitimate Interests

**What is the legitimate interest?**

dataTrace processes personal data to locate debtors who have:

- Changed address without informing creditors
- Deliberately avoided contact
- Failed to respond to collection attempts
- Outstanding lawful debts owed to clients

The purpose is to enable creditors to:

- Recover monies lawfully owed
- Prevent financial loss
- Enforce contractual rights
- Reduce fraud and deliberate debt evasion
- Maintain fair commercial practices

The tracing activity supports the administration of justice and the legitimate operation of commerce.

**Transferring the Data?**

The information will not be transferred outside the EEA.

**Security:**

The information provided by our clients and obtained during the course of dataTrace UK's enquiries, will be held internally by dataTrace UK in a secure manner on a password protected system with encrypted backup facilities.

dataTrace holds Cyber Essentials accreditation which supports our commitments to data security.

**How Long?**

The information provided by clients and obtained during dataTrace UK's enquiries, will usually be held in data format by dataTrace UK for a period of 12 months following completion of our enquiry, however this may be varied according to a

client's auditing requirements. Following this, the data will then be erased from our systems. Any hard copy information will be destroyed after 6 months.

### **Legal Rights of a Data Subject:**

Under certain circumstances, a Data Subject has rights under data protection laws in relation to their personal data. This section relates specifically to them.

- **Access to information:**

You have the right to request a copy of the information dataTrace UK holds about you

- **Ensuring accuracy of information**

dataTrace UK wants to make sure that your personal information is accurate and up to date. You may ask dataTrace UK to correct or complete information that is inaccurate or incomplete.

- **Right to erasure:**

You may have a right to erasure, which is more commonly known as the 'right to be forgotten'. This means that in certain circumstances you can require dataTrace UK to delete personal information held about you. Please contact us to have your personal data deleted by us.

- **Ability to restrict processing:**

You may also have the right to require dataTrace UK to restrict our use of your personal information in certain circumstances. This may apply, for example, where you have notified dataTrace UK that the information we hold about you is incorrect, and you would like dataTrace UK to stop using such information until we have verified that it is accurate.

- **Right to data portability:**

You may have the right to receive personal data that dataTrace UK holds about you in a format that enables you to transfer such information to another Data Controller.

- **Review by an independent authority:**

You will always have the right to lodge a complaint with a supervisory body, including Information Commissioner.

- **Preventing Direct Marketing:**

dataTrace UK does not sell your personal data for Marketing purposes.

- **Objecting to other uses of your information:**

You may also have the right to object to dataTrace UK's use of your information in other circumstances.

**Fees:**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

**What we would need from you.**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

**Time limit to respond.**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made several requests. In this case, we will notify you and keep you updated.

**Complaints**

You can make a data complaint by contacting [compliance@datatraceuk.com](mailto:compliance@datatraceuk.com) where your complaint will be acknowledged within 2 working days and a response provided to you within four weeks. If we need longer than this to investigate and respond, we will let you know.

Where we are not the controller of your data, we may pass your complaint to the controller for a response dependent on the nature of your concerns. If this is the case, we will let you know.

dataTrace UK is the trading style of Datatrace Consumer Services (UK) Ltd a company registered in England and Wales.

Registered address:

3 Connect Business Village

24 Derby Road

Liverpool

L5 9PR

Email: [info@datatraceuk.com](mailto:info@datatraceuk.com)

Company Number: 11453001

Information Commissioners Office Reg No: ZA454320

Telephone: 01527 386 626

To report any concerns to the ICO

Helpline number: 0303 123 1113

Website <https://ico.org.uk/>