

Integrated Contact Solutions Ltd (ICS Ltd) are committed to the protection of your privacy and your personal data. All personal data is processed fairly and in accordance with Data Protection Law. This Privacy Notice explains how we use the Personal Data which is held on our systems.

ICS Ltd respects and values your privacy and will not sell, loan or otherwise exchange your details with third party companies for marketing purposes.

ICS Ltd use data to help us provide collections services.

ICS Ltd are a Debt Recovery Agency who work on behalf of various clients / creditors. These are the data controllers. ICS Ltd are a Data Processor of the Personal Data that we hold on behalf of our clients. We hold Personal Customer information and process it in line with our contractual requirements. If you require the contact information of the Data Controller who holds your data please do not hesitate to contact us to obtain this. We would require full Data Protection to be confirmed prior to being able to disclose this information to you. This would mean asking you some questions, to confirm your identity e.g. your name, address, date of birth etc. This is to ensure that we are speaking with the correct individual and to ensure that your data is safe and secure.

### **Who does this Privacy Notice Apply to?**

Any customer of the data controller to whom we are contracted at Integrated Contact Solutions Ltd.

### **What types personal data could be processed?**

This may include - name / address (current or previous) / date of birth and information surrounding the matter we wish to discuss with you. We process the above information to fulfil the terms and conditions of a contract with the data controller.

### **Other information we may process**

Financial Data – this is to ensure that we have up to date information surrounding your finances to ensure that we have the best affordable repayment plan in place for you.

Vulnerability Data – this is to ensure that we deal with your account in the best possible manner and take the appropriate action for you, for example sending letters in braille.

### **Why are we collecting your personal data?**

This information is collected by our client and is then passed to ourselves. The data is as accurate as possible and in line with the information that was provided to the client. Consent may have been originally obtained within the Terms & Conditions of our client's contract.

### **Where has your information been obtained from?**

We could have obtained your information from our client. We may have also received up to date contact information from a Credit Referencing Agency. Personal Data may have been provided by you when speaking with us.

### **Why do we process your information?**

The reason that we process this information is to satisfy our contractual requirements with clients and fulfil our duties as a Debt Recovery Agency.

### **What do we use your personal data for?**

We do this to ensure that we manage your account appropriately and contact you to resolve the issue accordingly. The Consent for this will already have been provided to our client when the terms & conditions of their contract was agreed to. We may use your personal data to process your payments, provide you with the best service, to locate a new address, to process an application for employment. We will also process your data to comply with such legal obligations as the Financial Conduct Authority rules.

### **We will process your data in line with legitimate interests**

This means the processing is necessary for the legitimate interests of a third party (the Controller) to whom a debt is due and legally owed. We will keep an accurate record of our dealings with you. This ensures that we have an accurate history of your account in case of any disputes or Subject Access Requests. We record all our calls and monitor these to help train our staff and ensure that we have an accurate history of your account. We will not record or store any of your credit or debit card details on our system. We will store any correspondence received from you for a period of 30 days to ensure that we can deal with any disputes or queries that you may have.

### **How do we use your personal data?**

If you request information from us, or ask us to contact you, and provide us with details so that we can do this, then we may process this information to manage your account. This is to ensure that we are providing the most detailed information when providing you with information. We will also use your data to provide you with a service and ensure that you gain the best possible resolution. We will ensure that your account is updated with the appropriate notes and that these reflect the contact that you have made with us. Should you provide us with further contact information such as an additional number or email address then we may use this to contact you. Any updated information that we receive from you may be shared with our client.

If any personal sensitive data is disclosed to us this may be shared with our client, if you allow us to do so. The appropriate questioning will be conducted when we are made aware of this situation.

We will use your data for debt collection purposes, to trace customers utilising Credit Reference Agencies and to prevent money laundering and fraud.

### **Security of your personal data**

We take privacy very seriously and will use your personal information solely to administer your account. At Integrated Contact Solutions Ltd we ensure that we do the utmost to ensure that your data is safe and secure. We are ISO certified and hold ISO9001 and ISO27001. We are audited on an annual basis by a UKAS accredited organisation to ensure that we are fully complying with these accreditations and keeping our customers data safe. Your information will not be disclosed to any unauthorised third parties and all our suppliers and clients are compliant with the General Data Protection Regulations.

### **Your rights under GDPR**

To know why and how we are processing your personal data.

To obtain details of your personal data that we are processing.

To get details of your personal data in specific formats (eg post or by electronic mail).

To have your data rectified if it is incorrect. You can notify us of any incorrect data through a telephone call, Email or letter. If you believe that we should not be processing the data then you can speak with us about why you believe that the processing should be stopped or the data removed completely. You, as a data subject, have the right to object to ICS Ltd processing your data if the processing in question is an unwarranted interference with your interests or rights. As outlined above, we have a legal basis to process your data it being the legitimate interest of a third party to recover a debt due and legally owed.

### **Right of Access to your personal data**

Should you wish exercise your Right to Access/ Right to Object and access the data that we hold on you at any point please contact us in writing at:

Integrated Contact Solutions Ltd  
4100 Park Approach  
Thorpe Park  
Leeds  
LS15 8GB

You will receive an acknowledgement to your request within 5 working days.

You can also make a request for this by contacting us via telephone and speaking to one of our Customer Service Consultants. We will, with your permission, attempt to deal with any query over the telephone.

### **Complaints**

Should you wish to make a complaint to us regarding your Personal Data please do so in writing to the above address.

You also have the right to contact the Information Commissioner's Office (ICO) if you are unhappy with the way that we have handled your Personal Data. They are the supervisory authority who regulate the handling of Personal Data in the UK. You can contact them by using their website, phoning them on 0303 123 1113 or by post to:

Information Commissioners Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF

Our Data Protection Officer is  
Julie Bond  
Customer Relations Department  
Integrated Contact Solutions Ltd.

### **Data Retention**

Retention periods can differ depending on client contracts / requirements and are determined by the data controller. This will never be held for longer than required.

### **Disclaimer**

Information and text displayed in this website is for information only. Whilst every care is taken to ensure accuracy, visitors to the site must use their own discretion in using the material. No responsibility can be accepted by ICS Ltd. or its executives for errors or omissions. Integrated Contact Solutions Ltd are not responsible for the content of any sites other than [www.iccontactsolutions.co.uk](http://www.iccontactsolutions.co.uk).

We reserve the right to amend this policy from time to time and, should we do so, your continued use of the website will be taken as acceptance of any such change. You should check this page periodically to review any changes.

### **Cookies**

We use cookies to help identify which pages of our website are being used so we can tailor your user experience, collect voluntarily provided information and accept online payments.

You can disable any cookies already stored on your computer, but these may stop our website from functioning correctly. We have no access to your computer or device used.

### **The following is strictly necessary in the operation of our website.**

Our website will remember your accessibility, monitor your progress when using our payment gateway.

Our payment gateway provider, Sagepay, will also monitor your progress when taking payments

### **Our website will not share any personal information with third parties.**