

# Sinclair Goldberg Price Ltd - Our Privacy Promise

## Clients

### 1. Our point of contact

We will ask you to appoint a single point of contact. This will ensure that we only disclose data to the correct person within your organisation.

### 2. What data we collect

#### *On you*

- i. We hold data on your company for the purposes of providing your Debt Recovery Service and complying with our contractual and regulatory obligations.
- ii. We do not source additional information regarding your company other than that held in the public realm i.e Companies House.
- iii. We neither hold nor request Sensitive Personal Data on your staff.

#### *On your debtor*

We have to collect certain data with regard to your debtor in order to affect the recovery process. We will ask you to provide data such as names, addresses, contact information including emails addresses, payment and invoice details and verbal statements where required. **You must ensure that the information passed to us is accurate and transparent.**

### 3. What we use your data for

We will only process your debtors' data for the legitimate interest of acting as your Debt Recovery Agent, as per our contract with you.

We use data provided by you to enable us to assess the debt, negotiate disputes, obtain payment and/or settle the account on your behalf.

We promise that we will only use your debtors' data for the purpose of recovering your outstanding debt.

### 4. Who we give your data to

We will share your data with 3<sup>rd</sup> party suppliers for the purpose of debt recovery services, payment services and secure data storage.

We will share your debtors' data with the debtor so long as the debtor provides a Subject Access Request with confirmation of their identity.

We will also share your debtor's data with 3<sup>rd</sup> parties if required to comply with current legislation, regulatory requests or legal obligations.

### 5. How long we retain your debtor's data

Your debtor's data will be held for a period of 6 years following the closure of a case and is then deleted from our records. This information is held to comply with statutory and regulatory obligations for both you, us and your debtor.

### 6. Our contact with you

We promise not to send you 3<sup>rd</sup> party emails

Data we hold on your company is NEVER passed on to or sold to any 3<sup>rd</sup> party.

We will send you updates which directly affect our service i.e. changes to the Financial Conduct Authority, consumer legislation and/or matter which may affect recovery of your accounts. If you ask us to remove your email address, you will no longer be able to receive your status report nor industry updates which could be crucial to the recovery process.

Please let us know if any of your contact information need amending. Please email any changes to [info@sinclairgoldbergprice.com](mailto:info@sinclairgoldbergprice.com) and we will update your account.

## **7. Security of your data**

We will make sure your data is stored safely and only used for the purpose you have provided the data for.

We implement both on-site and off-site security regimes for secure data storage. This means that should there be a technical failure, we can restore stored data quickly and correctly.

We will ensure that any 3<sup>rd</sup> parties used in the recovery process, will store your data safely.

### **Debtors' data provided to SGP by our clients**

#### **1. What data we collect**

We do not sell or buy debt; therefore we only have your data if our client has provided this to us.

We collect data such as name, address, contact information including emails addresses, payment and invoice or statements where required.

We promise we will only process your data for the legitimate interest of acting as our client's agent in debt recovery.

We do not request Sensitive Personal Data.

If you wish to be represented by a 3<sup>rd</sup> party, we will ask you to give authority for us to hold this data. You will be asked to supply a Password to prevent any information being given to any other party other than that authorised by you.

Should the data we hold on you be incorrect, please contact us and we will amend your details accordingly

#### **2. What we use your data for**

SGP only uses data provided by our client for the purpose of affecting recovery of their outstanding accounts.

#### **3. Who we give your data to**

**We do not pass Consumer data to Credit Referencing Agencies or any organisation that may affect your credit rating**

We will share your data with 3<sup>rd</sup> party suppliers for the purposes of tracing services, payment services and external secure storage.

Should you request and give your consent, we will share your data with a 3<sup>rd</sup> party, for example a Debt Management company or your legal representative.

We will also share your data if required to comply with current legislation, regulatory requests or a legal obligation.

#### **4. How long do we hold your data**

Your data will be held for a period of 6 years and then deleted from our records. Your data is held for this time to ensure we can confirm what activity, including payments made by you, took place during this time. During this time you may request a Subject Access Request for the information we hold on the account. This period of time ensures that we can both provide you with information for the statutory period of 6 years and comply with our statutory and regulatory obligations.

#### **5. Security**

We implement both on-site and off-site security regimes for secure data storage This means that should there be a technical failure, we can restore stored data quickly and correctly.

We will ensure that any 3<sup>rd</sup> parties used in the recovery process, will store your data safely.