

## **Fair Processing Notice – Your Personal Data**

### What does this mean for you?

Our privacy notice provides you with information about how we use your personal data, which we are required by law to give you. Each section sets out different information, you can utilise the below list to choose which sections of our Privacy Notice you want to read.

What does this mean for you?.....	1
Who are Opos Limited? .....	2
What types of personal data do we collect and how do we collect it? .....	2
How do we collect your personal data? .....	7
How we use your personal data .....	8
How long we keep your personal data .....	11
Who we share your personal data with.....	11
Transferring your personal data outside of the EEA.....	12
Credit Reference Agencies Notice Explained .....	12
Sharing information to prevent crime or harm .....	13
How can you manage the data? .....	14
Your Rights .....	14
Object to Processing .....	14
Restrict Processing .....	14
Right to be Forgotten.....	14
Right to Rectification.....	15
Automated Profiling and Decision-Making.....	15
Right to Portability .....	15
Accessing Your Data.....	16

Cookies .....	16
How to Complain .....	17



## Who are Opos Limited?

Opos Limited is a data processor of your personal data. We are a leading provider of debt collection and business process outsourcing solutions in the UK. We are authorised and regulated by the Financial Conduct Authority (FCA).

To find out more about Opos Limited, please see our website: <https://www.oposlimited.com/opos/>






## What types of personal data do we collect and how do we collect it?

The types of personal data we collect are outlined below:

-  **Personal Data** – Personal data is information that can be used to identify you as an individual such as name, address, and contact information including IP addresses.
-  **Financial Data** – Financial data is information from your credit file, income and expenditure data, account information and any other information relating to your ability to repay your account.

### *Special Categories of personal data:*

Some categories of personal data are more sensitive, these are known as special categories of personal data and as an example, may include:

-  Racial, Ethnic origin
-  Biometric data
-  Ethnic origin
-  Religious beliefs
-  Data concerning health, sexual orientation

If you ever disclose this type of personal data to us, we will only keep this on record if it is necessary for the services we are providing. Where we do need to keep this data, we will always request your explicit consent. We will only store this data for as long as it is relevant and will check this with you

periodically. You have the right to withdraw your consent and if you do, we will delete the special category data from our records.

If you disclose special category personal data to us without us having the opportunity to obtain explicit consent, for example if you send a letter to us detailing your medical situation, you will have given your consent for us to process that data.

Where we consider it necessary to record the special category data you give to us, we will securely record this information. This does not affect your right to withdraw consent to the processing of this data.

We obtain and use information from different sources, so we often hold different information and personal data about each customer. All information we hold about our customers falls into the below categories:

Information Type	Description	Source
Key Customer Identifiers	<p>We hold personal data that can be used to identify people; this includes:</p> <ul style="list-style-type: none"> <li>•Name, including Title, Forename and Surname</li> <li>•Address, including current and previous addresses, if these are marked as no longer resident. Additionally, we will hold address confirmed as inaccurate to prevent these being reused.</li> <li>•Contact details, including telephone and email information, past and present. Additionally, we will hold contact details marked as inaccurate to prevent these being reused.</li> </ul>	<p>This personal data is included with all the other data sources.</p> <p>For example, names, addresses and dates of birth are matched to financial data, so it can be matched and associated with all other data Opos holds about the relevant person.</p> <p>Data is first obtained from the original lender of the debt in question, or the current lender of the debt in question.</p> <p>Data is also provided by customers directly in the daily interactions with ourselves or our agents.</p> <p>Data about UK postal addresses is also obtained from sources like Royal Mail.</p> <p>We also obtain copied of the edited electoral register containing the names and addresses of registered voters from local authorities across the UK in accordance with specific legislation.</p>

		We also have access to public data sources on people and businesses including from the Insolvency Service, Companies House, the CRAs and commercial business directories.
Customer Circumstances	We hold personal data relating to individual's circumstances including mental and physical health, financial status (including hardship) and difficulties relating to communication. The purpose of this information is to ensure all circumstances are taken into account when managing your account(s)	<p>This information will be obtained from:</p> <ol style="list-style-type: none"> <li>1. You, the customer, during an interaction directly with Opos Limited.</li> <li>2. A third party you have authorised to work on your behalf, or</li> <li>3. You, the customer, directly during an interaction with an agency working on our behalf.</li> </ol> <p>We do not actively obtain data from external sources relating to customer circumstances.</p> <p>We will always obtain customer consent before recording information relating to personal circumstances such as health, financial status or communication requirements.</p>
Financial Data	<p>We may receive information that includes personal data from credit accounts and other financial accounts that people hold with other organisations. This includes data about bank accounts, credit card accounts, mortgage accounts and other agreements that involve credit agreements such as utilities and communication contracts (including mobile and internet).</p> <p>The collected data includes the date the account was opened, the amount of debt outstanding (if any), any</p>	<p>Banks, building societies, lenders and other financial service providers supply data including personal data about people's financial accounts and repayments to CRAs.</p> <p>Other credit providers, such as hire purchase companies, utilities companies, mobile phone networks, retail and mail order, and insurance companies also provide this data when they agree credit facilities with their customers to the CRAs.</p> <p>These are then provided to us with</p>





	<p>credit limits and the repayment history on the account, including late and missing payments.</p> <p>We may also receive data about financial accounts like current accounts, credit cards or loans and may receive payment information that businesses hold from the organisations who maintain other accounts belonging to you. We may also use external data services from the CRAs to validate customer income</p>	<p>regards to our client's customers, to assist in our legitimate purposes.</p>
Court judgments, decrees and administration orders	<p>We may obtain data about court judgments that have been issued. This may include, for example, the name of the court, the nature of the judgment how much money was owed, and whether the judgment has been satisfied. Additionally, we may receive information about enforcement taken, such as charging orders on properties held by customers.</p>	<p>Judgments and some other decrees and orders are made publicly available through statutory public registers. These are maintained by Registry Trust limited, which also supplies the data on the registers to the CRAs and in turn, Opos Limited.</p> <p>Charging order information may also be provided by the Land Registry</p>
Bankruptcies, Individual Voluntary Arrangements (IVAs), debt relief orders and similar events	<p>We may obtain data about insolvency related events that happen to our client's customers and may also obtain this type of data about businesses. This includes data about bankruptcies, IVAs, and debt relief orders, and in Scotland it may include sequestrations, trust deeds and debt arrangement schemes. This data includes the start and end dates of the relevant insolvency or arrangements.</p>	<p>We obtain this data from our client's customers, their representatives, the Insolvency Service and the CRAs.</p>

Search footprints	<p>We have access to credit application information where a financial institution uses a CRA to make enquiries about a particular person, the CRA keeps a record of that enquiry which appears on the person's credit file.</p> <p>This includes the name of the application, the date, and the reason they gave for making the enquiry.</p> <p>Additionally, it may include such information as contact details, address information, income and employment situation of the applicant when they applied for the credit.</p>	<p>CRAs generate search footprints when enquiries are made about a particular person by other organisations.</p> <p>The organisation making the enquiry provides some of the data in the footprint (such as the reason for the enquiry).</p> <p>We in turn may obtain this information from the CRAs.</p>
Scores and Ratings	<p>We may use the data to produce scores and ratings including potential affordability, risk, fraud and identity checks, screening, collections, litigation and insolvency scores about our client's customers.</p>	<p>Should we utilise this data, we will produce scores and ratings using the data available to us and detailed in this section only.</p> <p>This data may be supplemented by the scores provided by the CRAs.</p>
Public Interest Data	<p>We may receive data from commercial sources which includes lists of Politically Exposed Persons (PEPs) and sanctions data; this is to ensure we meet our regulatory requirements.</p>	<p>We receive this data from reputable commercial sources as agreed from time to time.</p>

Other Derived Data	<p>We produce other kinds of data ourselves to manage our databases efficiently and to ensure that all the relevant data about a person is on the correct credit file.</p> <p><b>Address Links:</b> When we detect that a person seems to have moved to a different residence, it may create and store a link between the old and new address.</p> <p><b>Flags and Triggers:</b> through analysis of other data, we can add indicators to a customer's account file. These aim to summarise particular aspects of a person's financial situation. For example, a potential insolvency flag protects those who may be insolvent, and invites additional checks as a defence against further fraud risk.</p>	Opos Limited generates this data from the data sources available to them.
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## How do we collect your personal data?

We collect your information in the following ways:

-  We obtain data from the owner of your account
-  We keep records of correspondence between us, including letters email, live chat logs, SMS and any social media communications.
-  We record phone calls and webchats between you and our staff for training and monitoring purposes and to improve and enhance the service we offer you.
-  When you use our website, we may collect information concerning your usage of the website, behavioural patterns, traffic data, viewed pages and the originating domain name of your internet service provider. We operate CCTV at our business premises, if you were to visit our office, your image could be captured on CCTV.






We access third party data sources and combine and process data from those sources with your personal data. Examples of such third-party sources include Credit Reference Agencies (CRAs),

bankruptcies, register of court judgements, land registry, postcode lookup/verification databases and telephone number lookup/verification databases.

-  Third parties that we appoint may collect personal data from you and pass it on to us
-  We collect information concerning your usage of our website, behavioural patterns, traffic data, viewed pages and the originating domain name of your internet service provider.

## How we use your personal data

We use your personal data:

-  To help us service your account
-  To manage our operations and improve our service to you
-  To manage security, risk and crime prevention.
-  To meet our regulatory requirements
-  To undertake statistical analysis for business improvement

The table on the following pages, sets out the lawful bases that we rely on to process your personal data.



Business Process	Our lawful basis for processing	How do we use your data?
Debt Recovery	<ul style="list-style-type: none"> <li>• Performance of a contract</li> <li>• Legitimate Interests</li> <li>• Compliance with a legal obligation</li> </ul>	<p>As a business, our core operation is the recovery of outstanding balances, owed by individuals, where the sums due for repayment are owed to a client or clients of Opos Limited. As part of the recovery process we would need to perform trace and debt recovery activities (or authorise a third party to carry these activities out on our behalf); validate your identity, contact you in writing/SMS/email and telephone, agree repayment arrangements, process payments and where appropriate take enforcement action</p>
Promoting Responsible Lending	<ul style="list-style-type: none"> <li>• Legitimate Interests</li> </ul>	<p>We will collect personal data from and share your personal data with our client or clients who in turn may record this information with the Credit Reference Agencies in order to help promote responsible lending.</p>
Management of your account	<ul style="list-style-type: none"> <li>• Compliance with a legal obligation</li> <li>• Legitimate Interests</li> <li>• Performance of a contract</li> </ul>	<p>As a business, we have an obligation to manage your account and, where your account is a consumer credit agreement, our clients have a legal obligation to provide you with statutory communications. We have a legitimate interest in understanding your ability to</p>

		repay the outstanding balance as well as how best we and our clients can communicate with you.
Maintenance of data for use in defending legal actions	• Legitimate Interests	We need to be able to investigate and respond to customers claims and to provide appropriate disclosure in the event of proceedings being issued. This requires us to maintain information for a period after its original legitimate purpose has expired.
Training, Monitoring and Improving our Services	• Compliance with a legal obligation • Legitimate Interests	To ensure we provide the best service we can, we use recordings of telephone calls, which will contain personal data of our client's customers, to train staff. We may choose to ask another company to contact you to request feedback enabling us to review the service you've received and to make improvements where necessary. We monitor your website usage, collecting information to improve our service and operational business efficiencies
Complying with Legal and Regulatory requirements	• Legitimate Interests • Performance of a contract • Compliance with a legal obligation	At times we share data with other third parties where we have a legal or regulatory requirement to do so, for example the Financial Conduct Authority. In the event that you are unhappy and have made a complaint to the Financial Ombudsman Service, we will share your personal data with

		them enabling them to review your complaint.
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## How long we keep your personal data

We will keep your personal data for as long as you are a customer of a client of Opos Limited and their remains a lawful basis for processing.

We will keep your personal data for 6 years from when our relationship with you comes to an end, in order to respond to any complaints or queries and in complying with legal and regulatory obligations to keep certain records.

## Who we share your personal data with

At times we will need to share your personal data with other companies:

-  Other companies within the same group of companies as Opos Limited
-  Specialist Debt Collection Agencies or solicitor firms where they are acting on our behalf to help recover an overdue debt.
-  Other companies that may help us to validate that the data we hold is accurate or to obtain new information – for example a new telephone number.
-  Your original creditor
-  Current owner of your account
-  Suppliers and service providers – for example, companies that provide us with an IT infrastructure or mailing service.
-  Any person or company that you instruct to liaise with us – for example, a friend, family member, representative or a Debt Management Company

Whenever we engage with a third party we ensure that the third party has a similar level of safeguards and controls in place before sharing your personal data with them.






## Transferring your personal data outside of the EEA

We may transfer your personal data to organisations that operate outside of the European Economic Area enabling us to work with suppliers who help us to manage your account.






Where we do transfer your personal data outside of the EEA we will ensure that your data is protected, and any suppliers are part of the privacy shield, and/or that the appropriate contractual requirements are in place.

## Credit Reference Agencies Notice Explained

We are required where possible to share details of your account with our clients, who in turn may share this information with the Credit Reference Agencies (including sharing your personal data with the Credit Reference Agencies) on a recurring basis to promote responsible lending. The three Credit Reference Agencies our clients report information to are TransUnion, Experian and Equifax. We also obtain personal data from the Credit Reference Agencies for the following purposes:

-  To recover debts
-  To trace your whereabouts
-  To prevent fraud and other financial crime
-  To validate personal information that may be passed to us from you or other legitimate sources
-  To inform us on the best way to engage with you

The type of information that may be exchanged is outlined below:

-  Full Name
-  Full address including history of addresses
-  Date of Birth
-  Financial Situation
-  Personal details of any person you are financially linked with.

The Credit Reference Agencies may share the data that our clients provide to them with other organisations. You can find out more about the three main Credit Reference Agencies and the Credit Reference Agencies Information Notice on the websites below:

**TransUnion** – TransUnion will use your personal information to provide services to us and its other clients. We use their services in order to trace and recover debt. More information about TransUnion and the ways in which it uses and shares personal information can be found in its privacy notice at <https://www.transunion.co.uk/legal-information/bureau-privacy-notice>.

The Credit Reference Agency Information notice (CRAIN) can be found here;  
<https://www.transunion.co.uk/crain>

**Experian** – <http://www.experian.co.uk/crain/index.html>






**Equifax** – <https://www.equifax.co.uk/crain.html>

## Sharing information to prevent crime or harm

We have systems that protect our clients' customers and ourselves against fraud and other crime, including money laundering. Customer information can be used to prevent crime and trace those responsible.

As part of our ongoing monitoring of your account and to service your account, we have legal obligations that require us to obtain certain personal details to validate your identity, both at the beginning of your relationship with us and throughout it. If false or inaccurate information is provided by you, or if fraud or another financial crime is identified or suspected, we may obtain publicly available information, such as media reports or regulator publications, which may contain personal details about you such as any criminal convictions. If fraud or another financial crime is identified or suspected, we may be required to pass your personal data to fraud prevention agencies or other authorities for the prevention and/or detection of financial crime. We have legal obligations to pass this data to fraud prevention agencies and this is our legal basis for sharing personal data in this way.

The agencies we may share your personal data with are:

-  CIFAS
-  The National Crime Agency
-  Action Fraud
-  The Police
-  Her Majesty's Revenue and Customs

If we have reason to believe that you are in prison, we will obtain publicly available information, which may contain some of your personal data such as the name of the prison you are in and the

length of your sentence, to update the information we hold about you and to manage your account in the most appropriate way.

If we have reason to believe that you are in immediate danger, we will pass your personal data including any details we have about your physical or mental health, to the police and other emergency services in order to protect your vital interests.

## How can you manage the data?

You are able to access and manage much of the data we hold that allows us to administer your account and provide our services to our clients. You can do this via accessing the customer portal of Opos Limited, by visiting the following website - <https://www.oposlimited.com/customerAccess/>

Once you have accessed your online account you can edit and update your personal data, provide us with updated and accurate financial data and download statements and other account specific documentation.

## Your Rights

### Object to Processing

You have the right to object to us processing your data if the processing itself is an unwarranted interference with your interests or rights. You can find out more about how and why we process your personal data in the section entitled 'How we use your personal data'.

If you still believe that you have a valid and unjustifiable reason to exercise this right, you can contact us on the details below.

### Restrict Processing

If you believe we are processing your personal data unlawfully or you believe that we no longer need your personal data, you have the right to request that we restrict processing of your personal data. To make such a request, please contact us on the details below.

### Right to be Forgotten

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Under Data Protection legislation you have the right to request that we delete your personal data if you believe we no longer have a lawful basis to process it. If you feel that we should not be processing your personal data, you can submit a request using the below details.

### Right to Rectification

Upon obtaining personal data we conduct checks to validate that it is accurate as we are reliant on you and other third parties to provide us with correct information. If you believe that any of the personal data we hold for you is incorrect, it is important that you make us aware as soon as possible, for example if you have a new telephone number or have moved address.

### Automated Profiling and Decision-Making

At times, we may use the personal data we hold on you to conduct profiling and automated decisions, for example, to predict how likely you are able to pay back your outstanding balance or how best to engage with you.

The new Data Protection Act stipulates that where profiling or automated decision making produces a legal affect or similarly significantly affects you, we need to make you aware of your right to object. We do not believe that the profiling and decision-making that we may conduct has either a legal effect or similarly significant impact on you, but we will keep such processes and controls under review and update this notice accordingly.

If you have any further questions regarding any of the above, please contact our Data Protection Officer on [dataprotection@oposlimited.com](mailto:dataprotection@oposlimited.com)

### Right to Portability

You have the right to request that we transfer personal data you have provided to us either to yourself or to a data controller. You can exercise the right to data portability by contacting us on the below details:

**Email:** [dataprotection@oposlimited.com](mailto:dataprotection@oposlimited.com)

**Writing:** 2<sup>nd</sup> Floor, 15 Meadowbank Street, Dumbarton, G82 1JR

## Accessing Your Data

You have the right to see the personal data relating to you that we hold. As a data processor we will forward your request to the relevant data controller for completion.

We take the protection of your personal data seriously and we reserve the right to request proof of your identity before supplying any personal data.

Once we have validated your identity, the Data Controller will respond to your request within one calendar month. They will typically provide your data to you in an easily accessible, electronic format. If, however, you wish to receive it in a different format, for example as a printed document then please let us know when making the request.



In order to make this request, please contact us on the below details:

**Email:** [dataprotection@oposlimited.com](mailto:dataprotection@oposlimited.com)

**Writing:** 2<sup>nd</sup> Floor, 15 Meadowbank Street, Dumbarton, G82 1JR

## Cookies

Our website operates and collects cookies. A cookie is a small file that is placed on your computers hard disk which may be placed for several reasons, for example:

-  Google Analytics, such as analysing the traffic to the website and to speed up access to the website.
-  Targeted communications that help us to guide you back to specific pages within our website or reach you via third party websites.

The vast majority of web browsers accept cookies; however, you can manually change your browser settings so that cookies are not accepted. If you do this, you may lose some functionality of our website. For more information about cookies and how to disable them please go to [www.aboutcookies.org](http://www.aboutcookies.org)

We can confirm that any cookies placed by us shall not store or collect any personally identifiable information.



## How to Complain

If you would like to make a complaint or have a query about how we use your personal data, you can contact us on the below details:

**Email:** [dataprotection@oposlimited.com](mailto:dataprotection@oposlimited.com)

**In Writing:** Data Protection Officer, 2<sup>nd</sup> Floor, 15 Meadowbank Street, Dumbarton, G82 1JR

If you are unhappy about how we have handled your complaint, you have the right to complain to the Information Commissioners Office:

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

**Call:** 0303 123 1113