**HOW WE USE YOUR DATA**

This privacy policy outlines how LRC Limited will use, store and share your personal data and supplements any fair processing notice provided to you.

We will use your personal data fairly and lawfully and in accordance with the Data Protection Act 1998 and in accordance with the General Data Protection Regulation (EU) 2016/679)(GDPR) which comes into effect from 25/5/18 (“the **Act**”).For the purposes of the Act, LRC Limited are data controllers and data processors in relation to information supplied by our clients.

**PERSONAL DATA WE MAY COLLECT AND USE**

**Where we get your personal data from:** You may share personal data about yourself and your circumstances with us through use of our website or within phone calls, emails or otherwise. We may also receive personal data about you from third parties such as clients who have instructed us to act on your account.

**What categories of personal data we collect:**The personal data that we collect ourselves and receive from third parties may include the following: your name, address, e-mail address, phone number, debt information, payment history, credit reference information, and any other details relating to your account.

Please note that we may combine personal data we receive from other sources with personal data you give to us and personal data we collect about you.

**USES MADE OF YOUR PERSONAL DATA**

We will not own any data supplied by clients that instruct us, but we will process this data in accordance with this privacy policy.

We may use personal data held about you in the following ways:

* for our debt collection purposes to manage your account, to tailor payment plans to your individual circumstances, to locate you and to check/update your contact details;
* to carry out account analysis for ourselves such as to determine whether you are likely to pay your debts;
* to provide services to our clients in relation to debt collection (including to manage your account and to tailor payment plans to your individual circumstances), analysing your account (such as to determine whether you are likely to pay your debts, assessing affordability and to enable our client to make financial decisions), your payment history, account usage, check/update your contact details and to locate you;
* to allow you to participate in interactive features of our service, when you choose to do so; and
* to prevent money laundering and fraud.

If you require further information about the purposes for which we use your personal data then please contact our Data Protection Officer:

By letter: The Data Protection Officer, LRC Limited, Grains Building, High Cross Street, Nottingham, NG1 3AX

By email: clairestocks@legalrecoveries.com

**BASIS FOR USING YOUR PERSONAL DATA**

Our use of your personal data for the purposes set out above is for the legitimate interests of our business.  As indicated above we may also pass your personal data to third parties, and this is also for our legitimate business interests.

**HOW LONG WILL YOUR PERSONAL DATA BE KEPT BY US?**

We will retain your personal data for six years from the closure of your account with us.

**DISCLOSURE OF YOUR PERSONAL DATA TO THIRD PARTIES**

We may share your personal data with as set out above as under the heading “Uses Made Of Your Personal Data”.

LRC Limited may also share your personal data with certain third parties as follows:

* We may share your personal data with our client for whom we are acting with regard to your account as set out above under the heading “Uses Made Of Your Personal Data”.
* We may subcontract some of our services to sub-contractors and we may share your personal data with our sub-contractors as data processors.
* We may share your personal data with our suppliers who provide goods and services to us to enable them to provide these to us.  These suppliers are our data processors and may only use your personal data in the way we specify.

We may share your personal data with third parties if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our [terms of use](https://lowellsolicitors.co.uk/terms-and-conditions/) or to protect the rights, property, or safety of LRC Limited, our clients, our employees agents and subcontractors or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

**SPECIAL CATEGORY DATA**

The GDPR Act defines certain personal data as ‘**SPECIAL CATEGORY**’ such as personal data regarding your ethnic origin, physical health and mental health.

This information could be required in order to comply with regulatory requirements to treat customers fairly and to ensure that you and your data are handled appropriately   We may, for debt collection purposes, therefore ask you for some sensitive details or you may voluntarily give such personal data to us. We will only use this personal data for debt collection purposes and in order to ensure that both we and our client comply with any regulatory requirements. We will obtain your consent to store and process this data.  We may share any of your **SPECIAL CATEGORY** with our clients for debt collection purposes only.  Any such sharing of your **SPECIAL CATEGORY** data with clients will be on the basis of your consent or if we are required or permitted to do so under the above Data Protection legislation.

**WHERE WE PROCESS YOUR PERSONAL DATA**

The data that we collect from you will not be transferred to or stored anywhere outside of the European Economic Area (EEA).

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website.

**RECORDED PHONE CALLS**

We may monitor and/or record phone calls between our staff and you in order to offer you and our staff additional security, resolve complaints, for training purposes and to improve our quality and service standards.

**OTHER WEBSITES**

Our site may, from time to time, contain links to and from the websites of third parties.  If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies or your use of those websites.

**CHANGES TO OUR PRIVACY POLICY**

We reserve the right to amend this policy from time to time and if we do we will bring the new terms to your attention when you visit the website.

**COMPLAINTS AND ACCESS TO PERSONAL DATA**

The Act gives you the right to access personal data held about you.  If you would like to access this personal data, are unhappy with how we use your personal data then please contact our Data Protection Officer:

By letter: The Data Protection Officer, LRC Limited, Grains Building, High Cross Street, Nottingham, NG1 3AX

By email:  clairestocks@legalrecoveries.com

If you are not satisfied with our resolution of your concern then please contact the Information Commissioner’s Office on 0303 123 1113.

**CONTACT**

Questions, comments and requests regarding this privacy policy are welcome and should be addressed to:

By letter: The Data Protection Officer, LRC Limited, Grains Building, High Cross Street, Nottingham, NG1 3AX

By email: clairestocks@legalrecoveries.com