

Master Collections Privacy Policy

Introduction: The General Data Protection Regulation (GDPR) is a legal framework that sets guidelines for the collection and processing of personal information for individuals within European Union (EU).

GDPR becomes effective on 25th May 2018. Unlike the Data Protection Act 1998, GDPR applies to the whole of the EU. It is enforced by the Information Commissioners Office (ICO).

Who are we - Master Collections Ltd (MC) is a private limited company registered in England and Wales (Co number: 5505973) - whose registered office is at Eagle House C/O Ramon Lee & Partners, 167 City Road, London, EC1V 1AW.

Personal information means information about a living individual that can identify them. It includes name, address, email, telephone number and other financial information.

We do not hold *sensitive* data or *criminal conviction* data unless authorised by you.

Our approach: The ability to provide our Clients and other individuals including but not exclusive to visitors to our website, subscribers to and recipients of our Newsletter with the reassurance that any data held by us is relevant, securely maintained and administered according to GDPR is a key business driver for us.

So, it is our intention to comply with these new Regulations. We have conducted an appropriate Risk Assessment and acted upon the findings.

Data Protection Officer (DPO): Due to the nature and size of our business operations we are not required to appoint a DPO and do not intend to do so.

Staff training: All Employees have (or will) receive training in GDPR compliance. This includes misuse, data security, loss/theft and “phishing.”

Personal information we hold may include some/all of the following:

| Type of data | Description of data | Examples as to how we use that data |
|-------------------------------------|--|---|
| Client (Contact information) | Name Address Phone/email Photo ID including but not exclusive to Passport or Driving License. | <ul style="list-style-type: none"> • Client Relationship Management (CRM). • Validation of your identity &/or corporate status. • Marketing of MC products & services. • MC newsletter including legal updates. • Promotion of MC events & presentations, including that of our partners or other recommended service providers. |
| Other (Contact information) | Name Phone/email Address | <ul style="list-style-type: none"> • Marketing of MC products & services. • MC newsletter including legal updates. • Promotion of MC events & presentations, including that of our partners or other |

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| | | recommended service providers. |
| Client (Transactional information.) | Record of payment history . | <ul style="list-style-type: none"> • CRM. • Analysis and profiling. • Credit management. |
| Other (Transactional information.) | Record of payment history from debtors of clients, including outstanding invoices and supporting documentation. | <ul style="list-style-type: none"> • Analysis and profiling. • Debt collection. • Legitimate interests. Indeed, in order to deliver our services to clients effectively we may share debtor details with partners or service providers to enable enforcement of CCJ's and other debt collection activities. |
| Client (Contractual information.) | Copies of current contracts between us &/or instructions. | <ul style="list-style-type: none"> • CRM. • Credit management. |
| Other (Contractual information.) | Copies of contracts between client and their debtors. | Legitimate interests. Indeed, in order to deliver our services to clients effectively we may share debtor details with partners or service providers to enable enforcement of CCJ's and other debt collection activities. |
| Client (Consent and preferences.) | Ways you want us to contact you. | <ul style="list-style-type: none"> • CRM. • Marketing of MC products & services • MC newsletter including legal updates. • Promotion of MC events & presentations, including that of our partners or other recommended service providers. |
| Other (Consent and preferences.) | Ways you want us to contact you. | <ul style="list-style-type: none"> • Marketing of MC products & services • MC newsletter including legal updates. • Promotion of MC events & presentations, including that of our partners or other recommended service providers. |

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| Client & Other (Technical data) | MC uses Google Analytics to analyse the use of its website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to a website is used to create reports about its use. Google's privacy policy is available at: https://www.google.com/policies/privacy/ | <ul style="list-style-type: none"> • Number of visitors to MC website. This information is only processed in a way, which does not identify anyone. We do not make, and do not allow third parties to find out the identities of those visiting the website. |
| We may process your personal data to comply with any legal obligation that falls upon us. | | |
| MC Newsletter: MC distributes email newsletters to individuals who have subscribed to the same or previously expressed an interest in MC services or agreed to share their details with third parties. | | |

The top 5 causes of data breaches and how we intend to deal:

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| Phishing | <i>"Phishing" emails may be received requesting information or inviting a reply. Clicking on a reply may allow compromise our electronic records. Vigilance is required.</i> |
| Loss or theft of corporate asset(s). | <i>Any Portable devices including laptops, Tablets and mobile phones used by us are encrypted and passworded. Devices are not left unattended in public places. Devices left in motor vehicles will be secreted out of sight and vehicle locked.</i> |
| External attack. | <i>Security protection and malware is installed across all equipment. This will be maintained and updated as required.</i> |
| Abuse by insider: | <i>Due to the size and nature of our business operations we do not expect this to be an issue in reality. The use of USB or memory sticks is not permitted.</i> |
| Inadvertent misuse by insider: | <i>All Users are subject to ad hoc checks of their systems and hardware equipment. Audit trails are maintained to demonstrate a file's chain of custody. The Directors are able and/or control data sharing within our Business. This can be achieved remotely if required.</i> |

Transferring your data outside the EU: Any data held by us is stored securely within the European Economic Area (EEA) and regularly backed up. Before we transfer any data outside the EEA we will take all reasonable steps to make sure your data is treated securely and in accordance with this policy.

Withdrawal of consent: You may withdraw consent for us to hold data at any time and/or to have data removed-*right to erasure*. We will comply with your request for deletion of your personal data, subject to restrictions of our regulatory obligations and legitimate interests. For example; HMRC enquiries, VAT enquiries, payroll/pension/employee enquiries, money-laundering investigation or Companies House records. We are unable to accept verbal instructions to delete/amend data.

Copy of data held: You have the right to request the information we hold about you. If you would like a copy of some, or all, of the personal information, please email or write to us using the contact details noted below. Our preferred method of response is Recorded Delivery post to your last notified address held on our records.

Removal of data: We will remove/delete data in the following circumstances:

- Where you have instructed us to do so.
- Which is time limited by law or legislation.
- When your account with us has been inactive for 24 months.

We will only keep your data beyond this period if we have a legitimate reason to do so.

In good faith: We cannot be held liable for any loss or damage where we have acted in good faith on instructions purporting to be from you and where those instructions turn out to be fraudulent. We may, at our discretion, take reasonable steps to authenticate any instructions received before acting upon them but are not obliged to do so.

Changes of bank: We do not intend to change our bank so any statement you receive to the contrary requesting you to make payment into a different bank account is likely to be fraudulent. If you receive any such request, you should contact a known member of our team for validation before acting upon it. May we also remind you that should you make any payments into the other account(s) the full amount is still owing until received by us.

Breaches & Reporting: We intend to comply with GDPR requirements.

Emails: For your protection our emails are encrypted and SSL certified. Furthermore the MC website includes the *secure padlock* logo. Please be aware however emails may not be secure and so you should be careful as to what data is sent via email.

Review: These arrangements will be periodically reviewed and updated by us.

How to contact us: If you have any questions about our privacy policy or information we hold about you.
Email: enquiries@mastercollections.co.uk

Or write to:

Carlo Pegna
Master Collections
63 The Maltings
Roydon Road
Stanstead Abbotts
Herts
SG12 8HG

What can you do if you do not agree with how your personal data is processed?

You have a right to lodge a complaint with the supervisory authority for data protection.
In the UK this is:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF