

akinika Debt Recovery Ltd treats the data privacy of its clients, customers and website users very seriously and takes appropriate security measures to safeguard privacy, and is certified to Information Security ISO 27001 standard. The purpose of this Privacy Notice is to explain how akinika Debt Recovery Ltd collect, manage, share, protect and store Personal Data that you may share with us.

Personal Data means any data relating to an identified or identifiable individual, including but not limited to, a first and last name, a physical address, an email address or other contact information, whether at work or at home.

Our business

akinika Debt Recovery Ltd is a Debt Collection Agency trading from the registered address of 33/34 Winckley Square, Preston PR1 3EL (reg. 1242485). We are authorised and regulated by the Financial Conduct Authority (FCA) FRN 683212.

We provide Debt Collection and Debt Administration services to our clients including UK financial institutions, utility and telecommunication companies and the Public Sector. As part of conducting these services you or our clients whom we act on behalf of, provide us with information about you to enable us to conduct Debt Collection or Debt Administration services on their behalf.

Our Clients act as the 'Data Controller' of your data and we act as the 'Data Processor'. In such cases this Privacy Notice is therefore supplemental to the Privacy Notice provided to you by our Client.

How we obtain your Personal Data

Information provided by you

When a Data Controller decides to use our services they provide us with your Personal Data as is necessary for the Debt Collection or Debt Administration process. Data Controllers that we represent cover Financial Services, Utilities, TV Licensing and Public Sector.

You may also provide us with Personal Data directly via our website, over the telephone or in writing by letter or email. This Personal Data often includes name, address, date of birth, email address, bank account and/or payment card details. We use this information in order to fulfil the agreed Debt Collection and Debt Administration services on our client's behalf. We may also keep information contained in any correspondence you have with us by post or email and we record our telephone conversations with you.

In certain circumstances and always on behalf of the Data Controller, we will look to record sensitive medical information that you may provide directly to us (to ensure that we handle your debt account appropriately i.e. tailor our approach accordingly). In such circumstances we will always gain your consent to record such information on your account, in line with our regulatory obligations and client requirements to identify and appropriately assist vulnerable customers. You are able to withdraw such consent at any time.

We will never require children's data and will never knowingly accept a child's (less than 13years of age) account for a Debt Collection/Administration process. If, our Clients accidentally ask us to handle an account for a child (where customer falsely claimed to be an adult), as soon as we become aware that the customer is under age – we will immediately stop Debt Collection/Administration process and return control of the file back to our Client.

Information we get from other sources

We only obtain information from third parties if this is permitted by law. We may use legal public sources to obtain information about you, for example, to verify your new address or telephone number. This is done for the purpose of contacting you at your new address/telephone number as part of the Debt Collection/Administration process.

This information (including your name, address, telephone number etc.), as relevant to us, will only be obtained from reputable third-party companies that operate in accordance with the General Data Protection Regulation (GDPR), such as credit bureaus or government bodies. You will already have submitted your Personal Data to the companies and agencies and specifically given permission to allow them to pass this information to other companies that provide similar or complementary products and services.

How we use your Personal Data

We use your Personal Data to fulfil the agreed Debt Collection and/or Debt Administration services on our client's behalf. We endeavour, at all times to protect your Personal Data in compliance with the requirements of the General Data Protection Regulation (GDPR) concerning data protection. We will also take reasonable physical and information security measures to protect your Personal Data whilst in transit and storage.

Your information will not be used for marketing purposes by us or any third parties on our behalf.

We will not sell your data.

We never use or share any personally identifiable information provided to us online in ways unrelated to the Debt Collection/Administration process, this Privacy Notice or our Cookie Policy.

Data Controller's Legal Basis for processing your information

Where you have entered a contract with our Client (Data Controller) their legal basis for processing of your data is fulfilment of contract. Where Data Controller is in Public Sector – their legal basis for processing of your data is in the public interest. We perform the contract for Debt Collection and/or Debt Administration services as agreed between us and our client where our client act as the Data Controller and we act as Data Processor

Where we require special categories of data such as health information to handle appropriately to fulfil our duty of care to customers in vulnerable circumstances, the provision of this information and legal basis for processing this information is your explicit consent.

In certain circumstances, we may be required to share your Personal Data within the Capita Group Plc, of which we are a subsidiary, for example for the purposes of audit and compliance monitoring. In these instances the legal basis for processing your information will be legitimate interest.

Additionally, we may be required to obtain Personal Data from you in order to comply with our regulatory and legal obligations, for example to comply with anti-money laundering legislation, court orders or conduct fraud prevention. In these instances, our legal basis for processing information will be to fulfil a legal obligation.

Sharing information

We will always keep information about you confidential.

We may from time to time share your Personal Data within the Capita Group Plc, of which we are a subsidiary, for example for the purposes of audit and compliance monitoring.

In order to fulfil the performance of the contract between ourselves and our client, who are the data controller or to satisfy a legal obligation we may be required to disclose your information to third parties in the following sectors government, legal and compliance, law enforcement or similar. Examples of the types of third parties used include:

- any contractors and advisors that provide a service to us or act as our agents on the understanding that they keep the information confidential, for example tracing agents, credit reference agencies, anti-money laundering due diligence services or records management providers;
- any legal or crime prevention agencies and/or to satisfy any regulatory request if we have a duty to do so or if the law allows us to do so.

We do not transfer your Personal Data outside the European Economic Area.

How long do we keep information about you?

As the Processor of your Personal Data, we set a records retention period to allow us to fulfil the agreed contractual services to our client, this period is normally 7 years from the point at which we close your account at akinika Debt Recovery Ltd. Our retention periods meet legal, statutory and regulatory obligations. In all cases our need to use your Personal Data will be reassessed on a regular basis and information which is no longer required will be disposed of.

Data Subject Rights

As a Data Subject you have various rights that could be exercised by you under the GDPR to your Data Controller:

- Right to be informed
- Right to Access (Subject access requests)
- Right to rectification
- Right to erasure
- Right to restriction of processing
- Right to data portability
- Right to object
- Right to not be subject to decisions based solely on automated processing.

Where you contact us (Data Processor) with such requests we shall promptly pass your request to the Data Controller. Please refer also to the Privacy Policy /Notice for the relevant Data Controller for the details of your rights as a Data Subject.

If you would like to invoke any of the above data subject rights with your Data Controller – you can contact us (as we currently handle your account on theory behalf) and we shall promptly pass your request to our Client. Please submit your request to enquiries@akinika.co.uk or Correspondence Team, akinika Debt Recovery Ltd, 33/34 Winckley Square, Preston PR1 3EL.

Accuracy of information

In order to provide the highest level of customer service possible, we need to keep accurate Personal Data about you. We take reasonable steps to ensure the accuracy of any Personal Data or sensitive information we obtain. We ensure that the source of any Personal Data or sensitive information is clear and we carefully consider any challenges to the accuracy of the information. We also consider when it is necessary to update the information, such as name or address changes and you can help us by informing us of these changes when they occur.

Important information

Questions and queries

If you have any questions or queries which are not answered by this Privacy Notice, or have any potential concerns about how we may use the Personal Data we hold, please write to: compliance@akinika.co.uk

Data Protection Officer

The Capita group Data Protection Officer is Jenny Coombs who can be contacted at privacy@capita.co.uk

Policy changes

This Privacy Notice is regularly reviewed to ensure we continue to meet the highest standards and to protect your privacy. We reserve the right, at all times, to update, modify or amend this Notice. We suggest that you review this Privacy Notice from time to time to ensure you are aware of any changes we may have made, however, we will not significantly change how we use information you have already given to us without your prior agreement. This privacy notice was last updated on 24 May 2018.

If you have a complaint

If you have a complaint regarding the use of your Personal Data please contact us and we will do our best to help you: tel.01772832001 or complaints@akinika.co.uk or Complaints team, 33/34 Winckley Square, Preston PR1 3EL

You can also make a formal complaint to the Information Commissioner's Office (ICO) by contacting them on 01625 545745 or 0303 123 1113 or online at www.ico.org.uk/concerns/ You also have the right to judicial remedy against a legally binding decision of the ICO where you consider that your rights under this regulation have been infringed as a result of the processing of your Personal Data. You have the right to appoint a third party to lodge the complaint on your behalf and exercise your right to seek compensation.