

# Privacy Notice

## Complaints

The CSA group of companies comprises the Credit Services Association Limited and CSA (Services) Ltd, both of which process personal data. We respect your privacy and are committed to protecting your personal data.

This notice is intended to help you understand our processing of personal data and your rights when we process it. It sets out how we are going to use that personal data, including how long we'll hold it for and the reason we are processing it. But if you have any questions about the processing that this document doesn't answer, please feel free to contact us using the details given at section 1.4 of this notice.

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## **1. Who we are**

- 1.1 This notice is issued on behalf of the CSA group of companies - Credit Services Association Limited and CSA (Services) Ltd (**collectively "the CSA"**). Throughout this notice, references to "the CSA", "we", "us" or "our" are references to the CSA group of companies.
- 1.2 Credit Services Association Ltd is the only national UK trade association for the debt collection and debt purchase industry. We represent the industry to key stakeholders, including regulatory bodies and government, set out best practice for the industry and provide guidance and support to member companies.
- 1.3 CSA (Services) Limited is a wholly-owned subsidiary of Credit Services Association Ltd which provides training and development services to both member and non-member companies in relation to debt collection, debt purchase and associated activities.
- 1.4 The CSA can be contacted at the following details:

Credit Services Association  
2 Esh Plaza  
Sir Bobby Robson Way  
Great Park  
Newcastle-upon-Tyne  
NE13 9BA

0191 271 0775  
[info@csa-uk.com](mailto:info@csa-uk.com)  
[www.csa-uk.com](http://www.csa-uk.com)

1.5 The CSA does not have a data protection officer, but you can speak to our Compliance Manager, Daniel Spenceley, if you have any questions in relation to this notice or concerns about any data protection issues. You will find more details about your data protection rights in section 7 of this notice.

## 2. What is personal data

2.1 *Personal data* is information about a living person, by which that living person can be identified, either directly (i.e. the information itself identifies the person) or indirectly (i.e. whoever holds the data can identify the person by combining the information with another piece of information to which they have access).

2.2 In addition to *personal data*, there are also *special categories of personal data*, which demand stronger protection measures. These include data relating to a living person's health, sex life, sexual orientation, race, ethnic origin, political opinion, religion, membership of a trade union, and genetic or biometric data.

2.3 When it comes to processing special categories of personal data, we will only process this where:

- we have your explicit consent to process the data
- we must process the data to carry out a legal obligation
- we must process the data for reasons of substantial public interest
- you have already made the data public

2.4 In circumstances where we have asked for your consent to process special category personal data, we will be clear about precisely what we intend to use the data for.

2.5 When we ask for consent, you have full control over the decision to give or withhold consent; furthermore, you will continue to have control afterwards too and can withdraw it at any time. If you decide to withdraw consent, please be aware that this could impact our ability to provide the applicable service or product.

## 3. The personal data we process about you

3.1 In order to deal with your complaint, we will have to process personal data about you. The types of personal data we may process about complainants include:

TYPES OF PERSONAL DATA	
Identification	name, date of birth, gender
Contact	address, e-mail address, telephone number (work and/or personal)
Complaint details	complaint summary; supporting evidence; correspondence
Debt / account details	account reference(s)

3.2 We may also process some special categories of personal data (see sections 2.2 and 2.3 of this notice for more information about special categories of personal data). This may include:

SPECIAL CATEGORIES OF PERSONAL DATA	
Health information / documentation	disability information; information about medical / mental health issues

3.3 In most cases, we will collect this data from you at the point that you contact us about your complaint. We may also collect data from third parties who have appropriate authority to share information about you, such as the member company you are complaining about or someone you have asked to act on your behalf.

**4. Why we process your personal data**

4.1 We process your data for a variety of purposes. We have set out below the different purposes for which we may process your personal data.

4.2 Where this involves special categories of personal data, we have underlined references to this type of data, for ease of reference.

PURPOSES FOR PROCESSING	
Communication	To communicate with / respond to you, and to ensure that the relevant member company(ies) can contact you about your complaint.
Record keeping	To maintain adequate and up-to-date records
Legal and regulatory requirements	To meet all legal and regulatory requirements – including data protection.
Improving services	To monitor and improve our service.
Accessibility and support	We may process <u>special category personal data</u> (e.g. health information) to ensure we make any necessary adjustments for those with disabilities.
Assessing a complaint	To enable both the CSA and the relevant member company(ies) to investigate and respond to your complaint. To ensure that the CSA can take any necessary action once the investigation is concluded.  This may involve <u>special category personal data</u> (e.g. health information) where it is a factor in the complaint.

4.3 Where we plan to process personal data for a purpose other than those set out above, and which you would not reasonably expect, we will notify you before any processing for that new process occurs.

4.4 When we process personal data, we will always have legal grounds to do so. Data protection law sets out the different legal grounds that allow companies to process personal data, which include:

- processing in order to perform or fulfill a contract we have with you
- processing where we have a legal duty
- processing which is within our legitimate interests
- processing where there is a public interest reason
- processing where you have given us your consent

4.5 As outlined at sections 2.3 and 3.2 of this notice, we may process some special categories of personal data. Where we process this type of data, we need to have a stronger legal basis for that processing. We will rely on one of the following legal grounds for processing this type of personal data:

- We have a legal obligation to process the personal data
- The processing is required in the public interest, such as for equal opportunities monitoring
- We have your explicit consent for the processing – this will set out clearly what we will do with the personal data and, as with ordinary consent, you will have the right to withdraw consent.
- The processing is necessary to protect you or another person from harm.

4.6 Below we have clarified the legal basis we rely on to process your personal data.

<b>LEGAL BASIS FOR PROCESSING</b>	
<b>Consent</b>	<p>We will rely on your consent to process personal data about your complaint for the purposes outlined above. We may also rely on your explicit consent where you have provided <u>special category personal data</u> as part of your complaint, such as information about your health.</p> <p>We will ask for your consent when you complete our complaint form, which will give more detail about our specific use of this information. <u>You can withdraw consent at any point</u> by contacting us on the details at 1.4.</p> <p>You should be aware that withdrawal of consent may affect our or our member’s ability to investigate your complaint.</p>

**5. What we do with your personal data**

5.1 The CSA will not sell, loan or otherwise exchange your details with third party companies for marketing purposes.

5.2 We will only share your information where:

- We need to for the purposes of providing you with the services you have requested
- We have a public or legal duty to do so
- We have a legitimate reason for doing so
- We have asked for your permission to share it and you have agreed *e.g. for the investigation of complaints by a member company*

5.3 The following table explains any relevant data sharing arrangements and who we may share your data with.

<b>DATA SHARING</b>	
Data will be shared with relevant member company(ies) so that they can investigate the complaint.	
In some cases, data may be shared with the CSA board of directors, although we will endeavour to anonymise this wherever possible.	

- 5.4 Where we share data with third parties or where we use third party systems to store data, we will take necessary precautions to ensure that the third parties have appropriate data protection measures in place.
- 5.5 The majority of personal data we hold is stored either on our own internal server in the UK or on cloud-based storage. We also store some hard copy data in our office in the UK.
- 5.6 The CSA, or some of our partners or service providers, may pass information outside of the UK and the European Economic Area (EEA) into jurisdictions where privacy laws, obligations and rights may vary. In such cases, we will always ensure that appropriate assurance checks and measures are put in place to protect your privacy and that transfers are limited to countries which are recognised as providing an adequate level of protection or where we can be satisfied that appropriate alternative arrangements are in place to protect your privacy rights.
- 5.7 The below table outlines whether your data may be stored outside the UK or the EEA and, where this is the case, the protections in place.

<u>DATA STORAGE</u>
All complaint data is stored in the UK, either in cloud-based storage or in the CSA office.

- 5.8 The following table explains how long we will keep processing your personal data.

<u>DATA RETENTION</u>
<p>Formal complaint data is retained for the duration of the complaint investigation and for a period of 6 years from closure of the complaint. Formal complaint data is then securely destroyed and deleted. Although we will process some anonymised information for statistical and trend analysis purposes, you will not be identifiable from this information.</p> <p>However, if you exercise your right to withdraw consent for processing, complaint data will be retained until such time that you withdraw consent for its processing. Please note that withdrawal of consent for processing complaint-related personal data may impact our ability to investigate your complaint.</p>

**6. Automated decision-making and profiling**

- 6.1 The CSA does not make automated decisions, nor do we carry out profiling.

**7. Your data protection rights**

- 7.1 The individuals whose personal data we process have several rights. This includes the right of access to the personal data we process.
- 7.2 Where we process your data on the basis of consent or the performance of a contract, we may be required to provide some of your personal data to you in a portable format, or to another data controller on your behalf. Only data that you have provided to us is subject to this right. If you would like to exercise this right, please contact us by e-mail, in writing or on the telephone.
- 7.3 You also have other rights including:

- The right to have inaccurate data corrected. If you know or believe that we are processing inaccurate information about you, you have the right to have that corrected.
- The right to object to our processing. This will depend on whether we have a valid legal basis to process your data.
- The right to request that we restrict the data we process, or even have it deleted. Again, this will depend on the circumstances – we are not always required to delete your data or restrict our processing, if we can demonstrate we have a valid legal basis for processing it.

7.4 If you wish to exercise any of your data protection rights, please contact us so that we can act on your request or explain why we will be continuing to process the data we hold. You can contact us with your request by email, in writing or by telephone using the details given at section 1.4 of this notice.

7.5 These rights are subject to some exemptions. Where we cannot act on your request, we will provide a relevant explanation about our processing of your personal data in a timely manner.

## 8. Making a complaint

8.1 If you would like to complain about our data processing, please contact us by e-mail, in writing or by telephone with details of your complaint.

8.2 Data protection is regulated in the UK by the Information Commissioner's Office (ICO). You can complain to the ICO about our processing, but we would always welcome the opportunity to address any concerns with you first.

8.3 If you want to know more about data protection, or if you want to complain about our processing of personal data, you can contact the ICO via the details below:

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

0303 123 1113

8.4 You can also report concerns about companies' use of your personal data to the Information Commissioner's Office here: <https://ico.org.uk/concerns/>

## 9. Changes to this notice

- 9.1 From time to time, we will review this document, for example, where there are changes to laws or regulations, or where we make substantial changes to our processes, procedures or systems.
- 9.2 In such cases, we will update this notice to reflect the relevant changes and we will make reasonable efforts to contact and update those affected, if the changes are substantial in nature.

# Contact us

**T:** 0191 217 0775  
**E:** [info@csa-uk.com](mailto:info@csa-uk.com)

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2 Esh Plaza  
Sir Bobby Robson Way  
Great Park  
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