



BHDB Associates Ltd PRIVACY POLICY 2021

Any reference to “we”, “our” or “us” in this privacy policy shall mean BHDB Associates Ltd. This privacy policy applies to <https://thedebtadvice.co.uk/> which is owned and operated by BHDB Associates Ltd. The Debt Advice Service is a trading name of BHDB Associates Ltd.

Throughout this privacy policy “you” means the customer.

We believe you deserve the utmost respect when it comes to the security and use of your personal information, so we have described how we look after your information as clearly as possible.

Our data protection officer is responsible for the way our firm handles personal data.

WHO WE ARE AND INFORMATION ABOUT US?

Our site is owned and operated by us.

Our Company number is 10534486, we are incorporated in England and Wales.

Our registered address is 18-19 Salmon Fields Business Village, Oldham, England, OL2 6HT

We are registered under the Data Protection Act 2018 with the Information Commissioner’s Office (the, “ICO”). ICO Fee Payer Register Number: ZA542533

The Debt Advice Service provides debt solution information in anticipation of the appointment of Jason Bowen who is authorised to Act as an Insolvency Practitioner in the UK by the Institute of Chartered Accountants of Scotland (ICAS). Licence no. 22150

INFORMATION WE COLLECT

We collect information about you in which you provide to us through our website and through communications with us.

In addition to the personal and financial information you submit (or we collect), we may collect information about your computing including, where available, your IP address, operating system and browser type.

We may also record and/or monitor calls for quality checks and staff training.

BHDB Associates Ltd PRIVACY POLICY 2021

INFORMATION WE HOLD

We will hold information about you including: name, address, phone numbers, email address, date of birth, employment and banking and financial details which are associated with the service that we offer you.

We will also hold information about you from when you contact us and when we contact you.

Any other information which we reasonably need to provide you our services or fulfil our regulatory obligations will also be held by us.

HOW WE WILL USE THE INFORMATION ABOUT YOU

With your permission and/or where we are permitted by law we will use your information to help identify, develop or improve products that may be of interest to you. We will contact you by email, SMS, letter, telephone or in any other way about our products and services, unless you tell us that you prefer not to receive marketing. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out. We will always obtain your express opt-in consent before sharing your personal data with third parties for marketing purposes and you will be able to opt-out at any time.

The information will be used to enable us to monitor and analyse our business and carry out market research. This information may be provided to independent external bodies such as governmental departments and agencies to carry out research.

Your data may also be used for other purposes for which you give your permission or where we are permitted to do so by law or it is in the public interest to disclose the information or is otherwise permitted under the terms of the General Data Protection Regulation 2016 and the Data Protection Act 2018.

All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with Our obligations and safeguard your rights under the GDPR at all times.

BHDB Associates Ltd PRIVACY POLICY 2021

Our use of your personal data will always have a lawful basis, either because it is necessary for Our performance of a contract with you, because you have consented to Our use of your personal data (e.g. by subscribing to emails), or because it is in Our legitimate interests. Under the Data Protection Legislation, we must always have a lawful basis for using personal data.

Specifically, We may use your data for the following purposes:

- a) Providing and managing your Account;
- b) Providing and managing your access to Our Site;
- c) Personalising and tailoring your experience on Our Site;
- d) Supplying Our services to you (please note that We require your personal data in order to enter into a contract with you);
- e) For monitoring of calls made to and from customers to ensure that we are meeting the standards that we set;
- f) Personalising and tailoring Our services for you;
- g) Replying to emails from you;
- h) Supplying you with emails that you have opted into (you may unsubscribe or opt-out at any time by emailing us on info@thedebtadvice.co.uk);
- i) Market research;
- j) Analysing your use of Our Site and gathering feedback to enable Us to continually improve Our Site and your user experience;
- k) To manage your marketing preferences;
- l) To manage your data processing preferences;
- m) To compile anonymised data for analytical purposes.

You have the right to withdraw your consent to Us using your personal data at any time, and to request that We delete it. We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected.

LEGITIMATE INTEREST

Where we use legitimate interest for the basis of our processing of your personal data we shall ensure that we can demonstrate compelling legitimate grounds for the processing, which override the interests, rights and freedoms of the individual.

BHDB Associates Ltd PRIVACY POLICY 2021

You have the right to object to our use of your personal data where we use legitimate interest as the basis of processing. You can do this by contacting us on the details in the CONTACT US section.

Our legitimate interests include:

- a) The maintenance of our IT/Data Security systems and processes;
- b) Putting in place fraud prevention mechanisms;
- c) Keeping our records up to date; e) working out which of our products and services may interest you and telling you about them (i.e. direct marketing);
- d) Developing products and services;
- e) Being efficient about how we fulfil our legal duties;
- f) Maintaining a marketing suppression list;
- g) Complying with laws/regulations that apply to us; and
- h) Where you have made an enquiry about our services.

YOUR RIGHT TO OBJECT TO DIRECT MARKETING

You have the right to object to direct marketing. Please inform us of your objection by email, letter or telephone contact with our firm who will remove you details from our system in relation to direct marketing purposes.

INFORMATION WE SHARE

We will keep your personal information confidential and only share it with others for the purposes explained in this policy where we have gained consent to do so.

If we provide you with a recommendation for your case to be passed on to a 3rd party we will always gain your permission before doing this.

We will not under any circumstances sell or share your data with third party marketing companies.

We may however share the following information about you:

- a) With any firm, organisation or person who provides us with products or services or who we provide products and services to;
- b) With any payment system we may use;
- c) With regulatory and governmental authorities' ombudsmen, or other authorities, including tax authorities, including those overseas, where we are requested by them to do so.

BHDB Associates Ltd PRIVACY POLICY 2021

The types of companies to which we share your details with are as follows:

- a) Insolvency Practitioners
- b) Debt Management Firms
- c) Debt Counselling Firm
- d) Our Compliance Consultants

ACCESS TO YOUR INFORMATION

You have the right to request a copy of the information which we hold about you. This is called a Data Subject Access Request, which you can make by writing to us at 18-19 Salmon Fields Business Village, Oldham, England, OL2 6HT

In the first instance a request for information is free of charge. We may charge an administrative fee when a request is manifestly unfounded or repetitive in nature. We may also charge a further administrative fee when you request for us to provide further copies of the information already provided to you.

We want to make sure that your personal information is accurate and up to date. You may ask us to correct or remove information you think is inaccurate. We will respond to your request within one month of receiving your request. We will inform you of the third parties to whom your data has been disclosed.

YOUR RIGHTS

You have the following rights in relation to your personal data that we process:

- a) The right to be informed about our or collection and use of your personal data. We have provide this Privacy Policy which should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in the CONTACTING US section in this policy.
- b) The right to access the personal data we hold about you.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 15 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 15 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.

BHDB Associates Ltd PRIVACY POLICY 2021

- g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 15.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in the CONTACTING US section of this policy.

HOW YOU CAN ACCESS YOUR INFORMATION

If you would like to know what personal data, we have about you then you can ask us for a copy of you this date (provided we have this). This is known as a 'subject access request'.

You should make your subject access request in writing and send to the details set in the CONTACTING US section below.

A subject access request is normally free unless the request(s) are 'manifestly unfounded or excessive', i.e. you make repeated requests for the same thing, then we will charge a fee to cover our administrative costs in responding.

We will respond to your subject access request within one month from receipt, however in some cases, where you request in complex, we may require more time. We will always keep you informed of the progress of your request.

BHDB Associates Ltd PRIVACY POLICY 2021

HOW LONG WILL YOU KEEP MY PERSONAL DATA?

We will keep your data for only as long as we need this to provide our service to you or longer where we are required to do you by the law or our regulator.

The general rules that apply to our data retention are as follows:

- a) Where you have contacted us, but we have given no advice and made no referral to a third-party organisation then 12 months
- b) Where you have contacted us, we have given no advice but have made no referral to a third-party organisation then 3 years
- c) We have given you advice then we shall retain your personal data for 6 years ending the date that you entered into the debt solution recommend by us.

TRANSFER INFORMATION

We may transfer your personal information abroad to other countries outside of the UK. If we do so, we will ensure the information is held securely to standards at least as good as those in the UK and only used for the purposes set out in this privacy policy.

THIRD PARTY LINKS

This Privacy Policy only applies tur site. Out site may contain links to third party websites, if you follow a link to any of these websites, please note that these websites have their own terms and privacy policies and that we do not accept any responsibility or liability for them.

CHANGES TO OUR PRIVACY POLICY

We keep our privacy policy under regular review to ensure that we comply with any changes in the law, and we will place any updates on this webpage and will be deemed to be accepted upon your use of the site.



BHDB Associates Ltd PRIVACY POLICY 2021

CONTACTING US

You can contact us at:

- Phone: 01706 404143
- Email: info@thedebtadvice.co.uk
- Post: 18-19 Salmon Fields Business Village, Oldham, England, OL2 6HT