

NCO Europe Ltd Third Party Privacy Notice

Who are we?

NCO Europe Ltd will be what is known as the data processor for any data that we hold about you. Our company registration number is 3122581 and our registered address is New City House, 57-63 Ringway, Preston, Lancashire, PR1 1AF.

We may have been in contact with you as one of our customers has authorised for you to deal with us on their behalf. This authorisation has been communicated to us by the customer either verbally, in writing, or as a result of you being given a Power of Attorney over their affairs.

Who are our clients?

Our clients are known as the data controller for your data, meaning that they determine how your data is processed and for what purpose. As the data processor, we process your data on behalf of our clients in line with our legitimate, commercial interests and those of our clients.

Our clients are the legal owners of the account with the outstanding balance that they have passed to NCO Europe to manage on their behalf. For details of who the client and/or legal owner for this account are, please refer to any correspondence that the customer has received from NCO Europe, or alternatively, you can contact us at the address at the top of this notice, by emailing us at correspondence@ncoeurope.com, or by calling us on 0330 060 1500.

What data do we hold about you?

The data that we hold about you is classed as personal data. Personal data is any data that relates to you, a living individual, which enables you to be identified from that data. The sort of personal data we hold about you are your name, date of birth, address and contact details. We will only store your data if you have been authorised by one of our customers to deal with us on their behalf.

Why do we need your data?

Processing your personal data is necessary for the purposes of pursuing the legitimate interests of NCO Europe and of our client(s). The legitimate interests of both NCO Europe and the client is to manage the account with the outstanding balance for which the client is the legal owner, originating from a credit agreement between the customer and our client, or the creditor from which our client purchased the account from.

What do we do with your data?

All the personal data that we hold about you will be processed by our staff in the United Kingdom for the purpose of managing the account on behalf of our client. The information will be stored internally and may be seen by any agent working your account. This may be also be shared with any authorised 3rd party, our client or the Original Creditor

Unless we are authorised by you to do so, we will not send your data to any other third party except for external suppliers who assist us in fulfilling our contractual obligations to our client and pursuing our legitimate interests. The details of these businesses and the services they provide are:

- Critiqom Ltd of Document House, Strathclyde Business Park, Phoenix Crescent, Bellshill, ML4 3NJ. Critiqom provide letter printing and mailing services to NCO Europe so we may securely send some of your personal data to them to enable them to print and mail our correspondence to you.
- Complete Communication Solutions Limited (CCS), The Glades Festival Way, Festival Park, Stoke-On-Trent, ST1 5SQ, NCO uses CCS' portal to securely send some of your electronic correspondence to you.

Connex One Limited, Bow Chambers, 8 Tib Lane, Manchester, England, M2 4JB. Connex One's Platform enables inbound and outbound interactions through telephony and webchat services. These interactions are stored for training and monitoring purposes.

Computer Share, The Pavilions, Bridgwater Road, Bristol, BS13 8AE. Computer Share provide secure letter portal, SMS and email services NCO Europe so we may securely send some of your personal data to them to enable them to provide the correspondence to you.

Restore Datashred Limited, Unit Q1, Queen Elizabeth Distribution Centre, Purfleet, Essex, RM19 1NA. Restore Datashred Limited provide on-site shredding services to NCO to ensure that any of your data is confidentially disposed.

All processing activities carried out by NCO Europe and the suppliers named above are done so in line with the UK General Data Protection Regulation (UK GDPR) and we take all

necessary steps to ensure that your personal data is kept confidential and processed securely.

As NCO Europe are the data processor, we will inform our client of any changes to your personal data to ensure that they, the data controller, hold accurate and up to date information.

How long will we store your data for?

We will store your personal data for a period of 6 years after the customer's account has closed with us in order to provide our client with the services required under our contractual agreement with them. Account closure can be as a result of the outstanding balance being paid in full, reaching a settlement agreement, or the client closing the account with NCO Europe and recalling it.

We may also be required to provide your data to a regulator, government body or credit reference agency as a result of an investigation or a complaint. Storing your data for 6 years enables us to do this.

Sensitive Personal Data

As you are an authorised third party acting on behalf of a customer, we would not normally need to store any sensitive personal data relating to you, however there may be instances where you deem it appropriate to notify us of any health conditions or disabilities that you have or have had previously.

This kind of data is known as sensitive personal data and in order to allow us to process it we will obtain your explicit consent to do so at the time you provide the information to us.

Sensitive personal data will be shared with our client, as they are the legal owner of the account and the data controller, but it will not be shared with any third parties.

Sensitive personal data will be stored on the customer's account until 6 years after the account has closed, or until you notify us that you no longer consent to us processing this data, at which point it will be deleted.

What are your rights to your data?

Under the UK General Data Protection Regulation (UK GDPR) you have several rights regarding how your data is processed and how you can access it.

You have a right to access the data that NCO Europe holds about you and information around how it is processed. You can request this information free of charge and we will respond within 30 days providing a copy of all the data we hold relating to you.

You have a right to have your personal data erased if the purpose for it being processed by NCO Europe is no longer valid, or if the data has been unlawfully processed. You also have the right to withdraw your consent to the processing of sensitive personal data and have this data erased.

You have the right to data portability meaning that you can request that NCO Europe supply you with any of your personal data in an electronic format so you can then send this data to other businesses. You can also request that NCO Europe transfer this data for you to other businesses and we will do this where it is practical to do so and you have provided us with the details of where the data is to be sent.

You have the right to rectify your data if you believe that any data held by NCO Europe is inaccurate or incomplete. You can notify us of any discrepancies with your personal data and we will update our records accordingly where it is necessary to do so, as well as notifying our client and any relevant third parties of the changes made.

You have the right to restrict NCO Europe from processing your data if you believe we are storing personal data about you without verifying its accuracy, you believe our processing of your data is unlawful, or if we no longer need to store the personal data but you do not want the data erased as you require it to establish, exercise or defend a legal claim.

You have the right to raise your objections to the processing of your personal data if you believe that NCO Europe do not have legitimate grounds for processing your data or that the processing is unlawful.

You can exercise any of the rights explained above by writing to us at the address at the top of this notice, by emailing us at correspondence@ncoeurope.com or by calling us on 0330 060 1500. When contacting us please provide your NCO Europe reference number where possible.

How can you complain?

If you wish to raise a complaint about how NCO Europe have processed your data, including in relation to the rights explained above, you can contact our customer experience team by writing to them at the address at the top of the letter, by calling them on 0330 060 1122 or by emailing them at complaints@ncoeurope.com.

If you are not happy with the response of the customer experience team, or you believe that your data is being processed unlawfully, you can complain to the Information

Commissioner’s Office (ICO) by visiting their website <https://ico.org.uk/concerns/> or by calling them on 0303 123 1113.

Alternatively you can contact NCO Europe’s Data Protection Officer, Joanne Cowens by calling on 0330 060 1494 or by emailing at joanne.cowens@ncoeuropa.com.

Version Control

Review

Policies undergo review at 12 months - to be completed by 18 months - all amendments are approved by NCO Board.

Revisions

Author	Description of Change	Date of Revision	Version
Daniela Ferrer Francisco	Created the document but statement existed prior	01/06/22	1.2
Daniela Ferrer Francisco	Annual Update	14/07/23	1.3
Daniela Ferrer Francisco	Added reference to <i>sharing information with original creditor</i>	02/10/2023	1.4