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DEPARTMENT:	MANAGEMENT, OPERATIONS, ADMINISTRATION, FINANCE	Replaces:	0078-03
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TITLE:	PRIVACY POLICY	Attachments:	NO
Sub-Title:		Date Effective:	09.03.2018

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This Privacy Policy outlines how we (JCA Associates) will use, store and share your personal data.

We will always use your personal data fairly and lawfully and in accordance with the General Data Protection Regulations (GDPR). For the purposes of the regulations, we are the data processor where we are acting on behalf of the original creditor or the current owner of the account and who are the data controllers. We are passed your personal data for the purpose of the finance companies legitimate interests.

1. HOW WE COLLECT YOUR PERSONAL INFORMATION

Sources: We may receive personal data about you from third parties (our clients who are the owners of the agreement) and who choose to use the service we offer. We may also obtain information from trace agencies. In addition, we may also collect information from you or from your appointed representative through the use of our website and from communications between us such as within telephone calls, letters or emails.

Categories of personal data: The personal data that we collect and receive from third parties, from yourself and your personal representatives may include any or all of the following: your name, address, date of birth, relevant account reference numbers, e-mail address, phone number, debt information, payment history, payment details, credit reference information, case historic notes, vehicle details including registration and any other details relating to your agreement. This is likely to include information supplied by the original creditor or supplier. We will also retain records of communications from you concerning your agreement. Please note that we may combine personal data we receive from other sources with personal data you give to us and personal data we collect about you.



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2. HOW WE USE YOUR PERSONAL DATA

All data JCA Associates receive is processed in accordance with this privacy policy. We will not share your information with other companies for marketing purposes.

We may use personal data held about you in the following ways; for arrears collection purposes and to provide services to our client including to manage your agreement, to ensure that we are able to agree payment plans that are appropriate to your individual circumstances; to carry out our obligations arising from various creditors who wish to use the service we offer in line with the terms and conditions of any original agreement; to prevent money laundering and fraud.

We may also obtain information from tracing agencies to help locate you and to check/update your contact details and to enable us and our client to make financial decisions.

We may pass your personal data to approved field agents that are self-employed however have a confidentially agreement in place to ensure they do not pass your data to any one or any other company. Field agents may ask nearby residents if you reside at the property if you are not present during a visit. They will not disclose the reason for their visit nor disclose any of your personal data.

Any new data gained from tracing companies, field agents or third parties will be passed back to the owners of the agreement.

3. STORAGE AND SECURITY

We will not retain your information for longer than is necessary for the purposes outlined in this Privacy Policy. All information that you provide to us is stored on secure servers, all electronic form data is stored only in password protected areas. In addition to this JCA Associates hold Cyber Essentials Plus accreditation.

4. RETENTION

We retain your personal data for the length of time in accordance with all UK legislation.

In addition, each department will review annually its records to determine that these dates are adequate and appropriate.

All bank, debit/credit card details are not kept and are destroyed.



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5. SPECIAL CATEGORIES OF PERSONAL DATA

The regulations defines certain personal data called special categories of personal data as previously known as ‘sensitive’ and this may include for example data regarding your ethnic origin, physical health and mental health.

In order to carry out our role, we are required by the FCA (Financial conduct authority) to understand the circumstances of the people that we are contacting and in particular we are also need to establish whether people that we deal with could be regarded as vulnerable. This may involve collecting and using special categories of personal data. In certain circumstances then we may, for arrears collection purposes, therefore ask you for some sensitive details and we would then ask for your consent to store that information. Alternatively, you may voluntarily give such personal data to us. We will only use this personal data for arrears collection purposes and would only share such personal data with those other members of the JCA Associates and our clients who need to be aware of such information for arrears collection purposes only. Any sharing of your personal data with clients will be based on your consent or if we are required or permitted to do so under the General Data Protection Regulations. We may share your personal data with third parties if we are under a duty to disclose or share your personal data to comply with any legal obligation, or to protect the rights, property, or safety of JCA Associates, our employee’s, agents or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection.

6. TRACING AGENCIES

Tracing agencies have access to Credit Reference Agencies (“CRAs”.) CRAs hold personal data about consumers. Most of the personal data held by the CRAs relates to how you have maintained your credit accounts. They also hold address details and personal data from public sources such as the electoral roll, public records including county court judgments, and bankruptcy and insolvency data. We may obtain personal data about you from the CRAs for arrears collection purposes and to verify your identity, to locate you and to prevent fraud.

7. RECORDED PHONE CALLS

We may monitor and/or record phone calls between our staff and you to assist in providing both you and our staff additional security and for overall training and quality purposes. Call recordings are also retained in line with UK legislation.



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8. ACCESS TO PERSONAL DATA AND COMPLAINTS

You have the right to access the information held about you and to raise any complaints that you may have about how we are processing your personal information. If you wish to do so you should advise us in writing, addressed to JCA Associates, PO BOX 1365, Woking, Surrey, GU24 8UW. We request that you provide evidence of your identity such a photocopy (please do not send us the original) of your current passport or driving licence. If you wish to raise a complaint please contact the Compliance Manager at the same address or via email at hayleyblack@jcauk.co.uk

If you are not satisfied with our resolution of your concern then please contact the Information Commissioner's Office on 0303 123 1113 or go to <https://ico.org.uk/concerns>

9. COOKIES

Cookies are small, often encrypted, text files that are placed on your computer's web browser directories which allow a website to recognize a user's device. They are commonly used on the internet and often help to improve the user's overall internet experience.

We use "Session" cookies (these are deleted when the web browser session is closed) which are necessary in order for this site to function as intended.

You can configure your internet browser to allow or reject cookies. Please refer to your browser's help area for instructions on how to do this. Note that configuring your browser to reject cookies may cause some websites not to function as they were intended and this may diminish your internet experience. Further information regarding cookies can be found here <http://www.allaboutcookies.org/> (links to external website).

10. OTHER WEBSITES

Our site may, from time to time, contain links to and from the websites of third parties. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies or your use of those websites.