Controlaccount Privacy Policy

Who We Are

Controlaccount Ltd, *('Controlaccount' or 'we' or 'us' or 'our')* gather and process your personal information in accordance with this privacy notice and in compliance with the UK General Data Protection Regulation (UKGDPR) and the Data Protection Act 2018. This notice provides you with the necessary information regarding your rights and our obligations, and explains how, why, and when we process your personal data.

Controlaccount is a debt collection agency providing credit management solutions to businesses. Our registered office is at Compass House, Waterside, Hanbury Road, Bromsgrove, Worcestershire B60 4FD and we are a company registered in England and Wales under company number 02765607**.** We are registered with the Information Commissioner's Office Register; registration number **Z6855987**, and act as the data controller/data processor when processing your data**.** Our designated Data Protection Officer is **Karen Robinson** who can be contacted at Compass House, Waterside, Hanbury Road, Bromsgrove, Worcestershire B60 4FD.

Controlaccount is committed to safeguarding and preserving your privacy during our dealings with you in the provision of our services. in our communications to you electronically or in general and if you visit us through our website. This Privacy Policy, together with our Terms and Conditions, provides an explanation as to what happens to any personal data that you provide to us, or that we collect from you. We do update this Policy from time to time so please do review this Policy regularly.

INFORMATION THAT WE COLLECT

Controlaccount processes your information to meet our legal statutory and contractual obligations and to provide you with our products and services. We will never collect any unnecessary personal data from you and do not process information in any way, other than as specified in this notice

Clients

For the purpose of providing our services, we will only process information given to us by you, which is relevant, necessary and adequate and for the legitimate purpose of recovering monies owed to you. Sensitive data is information which is protected from unwarranted disclosure, and we will not process any data which is considered sensitive, unless it is required for legal or ethical reasons.

Subject Creditors

Controlaccount receives and processes data from its Clients for the legitimate purpose of recovering monies owed to them. When relying on a 'legitimate interest' for processing data, we have the extra responsibility for considering and protecting people's rights and interests. Prior to receiving data from

a Client, Controlaccount will carry out a 'legitimate interest' test which takes into consideration the following principles: -

Purpose Test: a Client is pursuing a legitimate interest;

Necessity Test: is the processing necessary for that purpose;

Balancing Test: do the individual's interests override the legitimate interests.

The importance of carrying out a 'legitimate interests' test is so that we can: -

- identify a legitimate interest;
- show that processing is necessary to achieve it; and
- balance it against the individual's interests rights and freedoms.

By following these principles, we are confident that an individual's interests do not override those legitimate interests.

Our Website

In operating our website, we may collect and process the following data about you:

- Details of your visits to our website and the resources that you access, including, but not limited to, traffic data, location data, weblogs, and other communication data;
- Information that you provide by filling in forms on our website, such as when you registered for information or make a purchase, including Name, Address, Email Address and Telephone Number;
- Information provided to us when you communicate with us for any reason.

INFORMATION WE DO NOT COLLECT

- Credit/Debit Card Information
- Information which may be consider sensitive and is not required for legal or ethical reasons.

USE OF COOKIES ON OUR MAIN WEBSITE

On occasion, we may gather information about your computer for our services and to provide statistical information regarding the use of our website to our advertisers.

Cookie	Platform	Purpose
caConsent	Controlaccount	Used to remember your selected cookie preferences for future visits to our website.

_ga, _ga_BNF3J2LE6J, _gcl_au,IDE, __Secure-3PSID, __Secure-3PAPISID, __Secure-1PSID, __Secure- 1PAPISID,APISID,HSID,SAPISID,SID,SSID,NID, __Secure-STRP, __Secure-ENID, __Secure- BUCKET,AEC,NID,SEARCH_SAMESITE,SOCS,DV	Google Analytics/Ads	Used to analyse website usage and to monitor the effectiveness of our advertising campaigns.
__cf_bm,bcookie,li_gc,lidc	LinkedIn Insight Tag	Used to monitor effectiveness of our advertising campaigns.
_fbp,datr,sb,wd	Meta Pixel	Used to monitor effectiveness of our advertising campaigns.
MUID,_uetsid,_uetvid	Microsoft Advertising	Used to monitor effectiveness of our advertising campaigns.

By using our website, you agree that we can place these types of cookies on your device.

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.allaboutcookies.org

To opt out of being tracked by Google Analytics across all websites

visit http://tools.google.com/dlpage/gaoptout

To the extent that any of the cookies described above collect personal information about a user of our website that personal information will be handled in accordance with our Privacy Policy.

Such information will not identify you personally it is statistical data about our visitors and their use of our site. This statistical data does not identify any personal details whatsoever.

Similarly, to the above, we may gather information about your general internet use by using a cookie file. Where used, these cookies are downloaded to your computer automatically. This cookie file is stored on the hard drive of your computer as cookies contain information that is transferred to your computer's hard drive, and they help us to improve our website and the service that we provide to you.

All computers have the ability to decline cookies, this can be done by activating the setting on your browser which enables you to decline the cookies. Please note that should you choose to decline cookies, you may be unable to access particular parts of our website. Our advertisers may also use cookies, over which we have no control. Such cookies (if used) would be downloaded once you click on advertisements on our website.

HOW WE WILL USE YOUR INFORMATION

The information that we collect and store relating to you is primarily used to enable us to provide and deliver our services to you. In addition, we may use the information for the following purposes:

- To provide you with information requested from us, relating to our products or services
- For the purpose of processing data on a 'legitimate interests' basis
- To provide information on other products which we feel may be of interest to you, where you have consented to receive such information
- To meet our contractual commitments to you
- To notify you about any changes to our website, such as improvements or service/product changes, that may affect our service.
- If you are an existing customer, we may contact you with information about services similar to, or which may be useful to you.

Further, we may use your data, or permit selected companies within our group – Broadriver - to use your data, so that you can be provided with information about unrelated goods and services which we consider may be of interest to you. We or they may contact you about these goods and services by any of the methods that you consented at the time your information was collected.

If you are a new customer, we will only contact you or allow third parties to contact you only when you have provided consent and only by those means you provided consent for. If you do not want us to use your data for our or third parties you will have the opportunity to withhold your consent to this when you provide your details to us on the form on which we collect your data. Please be advised that we do not reveal information about identifiable individuals to our advertisers, but we may, on occasion, provide them with aggregate statistical information about our visitors.

STORING YOUR PERSONAL DATA

We may transfer data that we collect from you to locations outside of the European Economic Area for processing and storing. Also, it may be processed by staff operating outside the European Economic Area who work for us or for one of our suppliers. For example, such staff maybe engaged in the processing and concluding of your order, the processing of your payment details and the provision of support services. In the event that any information is to be stored on servers which are hosted in non-EU countries, where this is the case, we will take steps to ensure that those providers use the necessary level of protection for your information and abide by the strict agreements and measures set out by Controlaccount Ltd to protect your data and comply with the relevant data protection laws and Regulations. By submitting your personal data, you agree to this transfer, storing or processing. We will take all reasonable steps to make sure that your data is treated securely and in agreement with this

Privacy Policy. Data that is provided to us is stored on our secure servers. Details relating to any transactions entered on our site will be encrypted to ensure its safety. The transmission of information via the internet is not completely secure and therefore we cannot guarantee the security of data sent to us electronically and transmission of such data is therefore entirely at your own risk. In circumstances where we have given you (or where you have chosen) a password so that you can access certain parts of our site, you are responsible for keeping this password confidential.

DISCLOSING YOUR INFORMATION

Where applicable, we may disclose your personal information to any member of our group. This includes, where applicable, our subsidiaries, our holding company, and its other subsidiaries (if any). We may also disclose your personal information to third parties where it is legal and necessary to do so and in circumstances where there is a lawful basis for processing such as: -

- Where we sell any or all our business and/or our assets to a third party;
- Where we are legally required to disclose your information in compliance with our legal obligations.
- To assist fraud protection and minimise credit risk;
- Data relating to a criminal offence and for the purposes of civil law enforcement;
- Legal claims where the processing is necessary for the establishment exercise or defence of legal claims, or for Courts acting in their judicial capacity.

A controller may process personal data where the controller has a legal obligation to perform such processing. The principle which applies in these circumstances is that the legal obligation must apply to the controller and must be binding in nature. For example, the "compliance with legal obligations" lawful basis does not apply where a government authority requests access to personal data, but the controller's compliance with that request is not legally mandatory. There may be other lawful bases available to the controller, depending on the facts.

THIRD PARTY LINKS

On our website you may find links to third party websites. These websites should have their own privacy policies which you should check. We do not accept any responsibility or liability for their policies whatsoever as we have no control over them.

HOW LONG WE KEEP YOUR DATA

We take seriously our responsibilities in relation to data handling and storage. ***We will only ever retain personal information necessary in relation to the purpose for which the data is processed.*** We have in place a retention document policy providing for erasure, pseudonymisation and encryption of data and which remains under review to ensure we meet these obligations.

We are required under UK tax law in some circumstances to keep and maintain accounting records for 6 years after which the data will be destroyed.

Where you have consented to us using your details for direct marketing purposes, we will keep such data until you notify us otherwise and/or withdraw your consent.

SPECIAL CATEGORIES DATA

Owing to the products and services that we offer, Controlaccount sometimes needs to process sensitive personal information (known as special category data) about you in circumstances where it may be required in the interests of justice and/or for any other legal purpose. Where we collect such information, we will only request and process the minimum necessary for the specified purpose and identify a compliant legal basis for doing so.

ACCESS TO INFORMATION

If you have any questions about this notice, our processing of your personal data, or about your rights over your personal data, our Data Protection Officer can be contacted at:

compliance@controlaccount.com

or

The Compliance Officer
Controlaccount
Compass House
Waterside
Hanbury Road
Bromsgrove
Worcestershire B60 4FD

USE OF OUR WEBSITE

Other personal data that we may process about you

If you are an employee or client of a member of the Controlaccount group of companies, a registered user of any other Controlaccount website, or you are otherwise the recipient of any product or service from a member of the Controlaccount group, then a separate privacy notice will have been made available to you, providing you with information about our processing of your personal data in that capacity.

YOUR RIGHTS AND SUBJECT ACCESS REQUEST

The UK General Data Protection Regulation and The Data Protection Act 2018 give you the right to access the information that we process about you and to request information about: -

- What personal data we hold on you
- The purpose of processing
- The categories of personal data concerned
- The recipients to whom personal data has/will be disclosed
- How long we intend to store your data directly from you, information about the source
- If we did not collect the data directly from you, information about the source.

If you believe that we hold any incomplete or inaccurate data or to restrict processing (where applicable) in accordance with the data protection laws; as well as to object to any direct marketing from us. Where applicable, you have the right to data portability of your information.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure.

Should you wish to receive details that we hold about you please contact us using the contact details below.

LODGING A COMPLAINT

Controlaccount only processes your personal information in compliance with this privacy notice and in accordance with the relevant data protection laws. If, however, you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint with the supervisory authority.

If you do wish to raise a data related complaint you can do so by visiting our website https://www.controlaccount.com/complaints where we have an option to submit a data complaint. In cases where we are not the Data Controller, we may redirect you appropriately.

If you have additional needs or requirements that mean you are unable to use the website to contact us, please e-mail compliance@controlaccount.com with details and we will look to make reasonable communication adjustments.

Alternatively, you can contact us in writing at

Controlaccount Ltd

Karen Robinson - Responsible for Data Protection Compliance

Compass House, Waterside, Hanbury Road, Bromsgrove B60 4FD

Supervisory Authority - The Information Commissioner's Office - ICO

The Information Commissioner's Office (ICO) can be contacted at: -

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Telephone: 0303 123 1113 ***(local rate)*** **or 01625 545 745** ***(national rate)***
Fax: 01625 524 510
Email: enquiries@ico.org.uk