

Privacy Notice

Complaints

Both the Credit Services Association Limited and CSA (Services) Ltd (**collectively “the CSA”**) process personal data. We respect your privacy and are committed to protecting your personal data.

This notice is intended to help you understand all about 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.

1. Who is the CSA?

1.1 This notice is issued on behalf of the CSA group of companies - Credit Services Association Limited and CSA (Services) Ltd.

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 our 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
www.csa-uk.com

1.5 The CSA does not employ a data protection officer, but you can speak to our Head of Regulatory Compliance & Standards, Claire Aynsley, or 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 a later section.

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 ordinary 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. When we ask for consent, you have full control over the decision to give or withhold consent; you will continue to have control afterwards too and can withdraw it at any time.

3. What types of personal data does the CSA process? And what do they do with it?

- 3.1 Depending on who is making the complaint and the circumstances of the complaint, the personal data that we hold might include personal data about the complainant (which could be the account holder, someone representing them or a third party who has no relationship with the member company) and personal data about somebody connected to the complainant (e.g. a joint account holder).
- 3.2 We will process information about you for identification and contact purposes as part of our complaints process, including name, address, e-mail addresses and telephone numbers. This is required to make sure we are able to identify and make contact with complainants or their representatives, and to make sure we communicate by a preferred method.
- 3.3 Depending on the reason for the complaint, we may need to process account and payment information, such as the outstanding balance, the creditor, and disputes about the debt.
- 3.4 In some cases, we might also process special category personal data, such as information about the complainant or account holder's health, if it is relevant to the complaint.
- 3.5 The personal data we hold will be used for investigating and responding to the complaint, as well as taking any necessary action against our member and/or providing them with feedback.
- 3.6 We receive personal data for complaints from you. We will also receive information from the member company(ies) involved in the complaint.
- 3.7 In accordance with our complaints procedure, information provided as part of your complaint will be shared with the member company(ies) so that they can investigate and respond to the alleged breaches of the CSA's Code of Practice, unless you request that information is not shared.

- 3.8 Where you request that information is not shared with the member company(ies), this may affect both our and the member company(ies)'s ability to conclusively investigate and respond to the complaint.

4. What are the legal bases for the Credit Services Association's processing activities?

- 4.1 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:
- in order to perform a contract that we are party to
 - in order to carry out legally required duties
 - in order for us to carry out our legitimate interests
 - to protect your interests
 - where something is done in the public interest
- 4.2 When we process personal data as part of a complaint, we will do so on the basis of consent. This means that we'll need the permission of whoever's data is being processed so that we can deal with the complaint. If you're complaining on someone else's behalf, we will need their permission to process their personal data or we'll need evidence showing that you are authorised to act on their behalf.
- 4.3 You have the right to withdraw consent at any time – please just contact us to let us know (see 1.4 for contact information). If you withdraw your consent, you should be aware that this may affect our or our member's ability to investigate your complaint.
- 4.4 The complaint process requires complainants to complete, sign and return a complaint form. This form is where you will provide your consent and it explains in more detail precisely what we will do with the personal data provided.

5. Who is my data shared with?

- 5.1 Complaints data will be shared with the member company(ies) that you have complained about, so that they can investigate the alleged breaches of the Code of Practice.

6. Where is personal data stored?

- 6.1 Complaint data is stored on the CSA's server, which is located in the CSA offices.
- 6.2 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. In particular, member companies are required to comply with data protection provisions under our Code of Practice.

7. How long is personal data kept for?

- 7.1 Complaint data is retained for the duration of the complaint investigation and for a period of 6 months from closure of the complaint. After this point, the personal data will be securely destroyed and deleted.
- 7.2 We will continue to process anonymised information about the complaint for statistical and trend analysis purposes. All personal data will have been removed and destroyed or deleted, and you will not be identifiable from the retained information.

8. Does the CSA make automated decisions about me or profile me?

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

9. What can I do if I want to see the personal data held about me? What are my rights in relation to my personal data?

- 9.1 The individuals whose personal data we process have several rights. This includes the right of access to the personal data we process. If you wish to exercise this right and see the personal data that the CSA holds, you can make this request by contacting us by e-mail, in writing or on the telephone. Our contact details are noted above.
- 9.2 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.
- 9.3 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.
- 9.4 If you want to exercise one of these 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.

10. Who can I complain to if I'm unhappy about the use of my personal data?

- 10.1 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.
- 10.2 Data protection is regulated in the UK by the Information Commissioner's Office.
- 10.3 If you want to know more about data protection, or if you want to complain about our processing of personal data, you can contact them at the details below:

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

0303 123 1113

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

11. Changes to this notice

- 11.1 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.
- 11.2 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

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NE13 9BA

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