

Document Management

Data Protection & Privacy Policy

Revision

2.3

Revision History

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Approval

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1 About this document

This Data Protection and Privacy policy will help you understand how we collect, use and protect your personal information. If you have any queries about this document or how we process your personal information please contact our Data Protection Officer by email: bernie@securecollections.com or by post to Data Protection Officer, Secure Collections Ltd., Suite 6, Centre for Advanced Industry, North Shields, NE29 6DE.

2 Who we are

The organisation responsible for processing your personal information is Secure Collections Ltd (Company Number: 04962772) a Bankers' Automated Clearing Services (BACS) approved bureau number B20943.

Secure Collections act as a 'data controller' and also a 'data processor' under the Data Protection Act 1998 and the General Data Protection Regulation 2018 (GDPR)). Our registration number with the Information Commissioner's Office is Z852201X <https://ico.org.uk/ESDWebPages/Entry/Z852201X>. **Where we act as a 'data processor', 'data controllers' should share this document with their customers.**

3 Data Protection Terms

Data is information stored electronically, on a computer, or in certain paper-based filing systems.

Data subjects for the purpose of this policy include all living individuals about whom we hold personal data. A data subject need not be a UK national or resident. All data subjects have legal rights in relation to their personal information.

Personal data means data relating to a living individual who can be identified from that data (or from that data and other information in our possession). Personal data can be factual (for example, a name, address or date of birth) or it can be an opinion about that person, their actions and behaviour.

Data controllers are the people or organisations which determine the purposes for which, and the manner in which, any personal data is processed.

Data processors in relation to personal data, means any person (other than an employee of the data controller) who processes the data on behalf of the data controller. When engaged as a commercial bureau, Secure Collections typically act as a 'data processor'.

Data users are our employees whose work involves processing personal data. Data users must protect the data they handle in accordance with this data protection policy and any applicable data security procedures at all times.

4 Information we collect and store

4.1 As a 'data controller'

- Our staff's personal contact details, national insurance number, pension and salary payments
- Clients and suppliers company name, address and telephone number
- Clients and suppliers staff contact details, including telephone numbers, email address and position.
- Invoice history
- Marketing contact preferences
- Contract information.

4.2 As a 'data processor'

- Financial information, including your BACS scheme name, service user number and bank details.
- Your staff's permissions to receive Bureau reports
- Your payees contact details, address, telephone numbers, email address, bank account details, payment schedules, payment history and date of birth.
- Your players lottery ticket count, contact preferences and hear about options
- Card payments including authorisation request outcome, last 4 digits of the card number, name on the card, expiry date and originating IP address.
- Postcode lookup history and outcome
- Bank Account modulus check request and outcome including bank details and Internet Protocol (IP) address.
- BACS amendments to bank details, cancellations, unpaid direct debits with reason codes, new instruction rejections and indemnity claims
- Payroll numbers and amounts for credit distribution.
- Written correspondence history.

5 How we collect information

- Information is provided directly from our Clients or by payees signing up via bank approved on-line web forms.

6 How your information is used and our legal bases for processing

We store your information for the following purposes:

- (a) Administering your direct debit scheme
- (b) Collecting direct debits on your behalf
- (c) Distributing credit payments on your behalf
- (d) Initiating card payments on your behalf.
- (e) Providing you with reports of payment submissions, payer amendments, cancellations, unpaid, new instruction rejections and indemnity claims.
- (f) Collecting our fees and administering our contract with you.

7 Your data and marketing

As a 'data processor' we will never use payees contact details for our own marketing purposes and we will not pass this data onto any third party companies. We may pass your web form, on-line marketing preferences back to the 'data controller' who may use your preferences in accordance with their data protection policy.

As a 'data controller' we would only contact our Clients with information relating to the services we provide and any amendments to those services.

8 Processing Outside of the European Economic Area (EEA)

During the course of our business operations, we store data electronically on servers at our main office, contingency site and on cloud servers located in Germany. All data is stored within the EEA

9 Data Retention

Personal data is retained according to the following schedule. A direct contract between Secure Collections and a Client may override these default retention periods.

Type of Data	Retention Period		Purpose of Processing
	Active Clients	Obsolete Clients	
Client/Supplier Contacts	Indefinite	1 Year	Contract
Direct Debit Schemes	Indefinite	1 Month	Direct debit management
Direct Debit Instructions	Indefinite	1 Month	Direct debit set-up
Direct Debit Transactions	3 Years	1 Month	Direct debit transactions
Direct Credits	3 Years	1 Month	Direct credit transactions
Card Payment Transactions	3 Years	1 Month	Card payments
Customer Amendment Files	12 Months	1 Month	Reports to amend direct debit instructions/transactions
BACS Submission Files	6 Months	1 Month	Generated files sent to BACS
BACS Reports	6 Months	1 Month	Direct debit amendments, cancellations and unpaids retrieved from BACS
Invoices	7 years	7 years	Financial audit trail

10 Data Security

- Personal data is not permitted to be transmitted in an unencrypted format
- Data is permanently erased in accordance with our data retention timescales
- Information is stored and accessed by 'Data users' in accordance with Industry best practice.

11 Your Rights

Under the Data Protection Act and GDPR you have the following rights:

- to obtain access to, and copies of, the personal information that we hold about you in a reasonable format specified by you. Where we act as a 'data processor' this information will be passed to you via your 'data controller'
- to require us to correct personal information we hold about you if it is incorrect
- to require that we cease processing your personal information if the processing is causing you damage or distress;
- to require us not to send you marketing communications. We would never send marketing communications when acting as a 'data processor'
- to require us to erase your personal information;
- to require us to restrict or object to our data processing activities
- if you are not satisfied with how we are processing your personal information, you can make a complaint to the Information Commissioner.