

## **Your Debt Solution: Privacy Policy**

Protecting your personal data is important to us. This notice explains how we collect, use and store your personal information.

[www.yourdebtsolution.co.uk](http://www.yourdebtsolution.co.uk) & Your Debt Solutions Ltd is committed to protecting the privacy and security of your personal data. This Privacy notice explains how we collect, use and store your personal information.

This privacy policy applies to you if you provide your personal information to us.

If you have any questions about how we may use your personal information you can contact us at:

Your Debt Solution Limited, 71-75 Shelton Street, Covent Garden, London, WC2H 9JQ

Email; [steve.gibbon@yourdebtsolution.co.uk](mailto:steve.gibbon@yourdebtsolution.co.uk)

Please note that this website and our products and services are not intended for children and we do not proactively collect their personal information. However, we are sometimes given information about children as part of providing advice and setting up products and services. The information in the relevant parts of this notice applies to children as well as adults.

If you are not happy with how we process your personal information you should contact us in the first instance. If you're not happy with how we have dealt with your complaint you have the right to lodge a complaint with the Information Commissioner's Office.

You can find their details on their website at <https://ico.org.uk/>

Your Debt Solution Ltd is a "Data Controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

At times Your Debt Solution acts as a "Data Processor". This means that we process personal information about you on another Data Controller's behalf and instruction. We will only do so where the Data Controller has explicit consent to share your information with us for a specified purpose(s).

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

We will only collect information that we genuinely need, or where we're required to collect the information to enable us to perform our legal or contractual obligations necessary to provide you with the products or services, where we have a legitimate interest to do so, or where we have your permission.

This will likely include the collection of:

your personal details (e.g. name, date of birth)  
address history  
contact details  
special personal information\* (e.g. health information)  
financial information  
employment information  
Special personal information\*

Data protection law defines some personal information as “special categories of data”. This includes information about physical or mental health, sexual orientation, religious beliefs, race or ethnic origin, political opinions, trade union membership or biometric data. Some of this information may be necessary to collect when seeking to understand the reason for your financial circumstances, or if it may help us to provide a better service to you. For example, a period of ill health could be the reason for your financial difficulties.

Where we need to collect and process this type of data about you, by providing this information to us you give your explicit consent for us and any other third party to process this special data as set out in this privacy policy, unless we have a legal obligation to process this type of data.

Information about other people

If you provide personal information about someone else or a joint application is made, you must do so with the permission of the other person. Your personal information may be shared with the other person on the application.

We will use the personal information about the other person in the ways as described in this privacy policy.

We collect your information in several ways.

When you make enquiry to us either by phone, email, by a third party or by any other means  
When we may need to obtain up to date information about you to meet legal or regulatory obligations

Where you have given permission for your information to be provided to us

We can only use your personal information where it falls into one or more of the following categories:

it is necessary to enter into or fulfil a contract we have with you;  
you have provided your consent;  
we have a legal or regulatory obligation to do so;  
it is necessary to carry out a task which is in the public interest;  
it is necessary to protect your vital interests; or  
it is in our legitimate interest to do so and it is not against your rights.

## 8. Initial Application/Advice

Where you make an enquiry, we'll use your information to provide you with appropriate information about any solutions we may be able to offer you. If you cannot provide this information, we may not be able to deal with your enquiry. We will also use this information to contact you about and process your enquiry, for example, sending you an email, SMS or WhatsApp message.

The table below specifically explains how and why your personal data will be used so that the services can be provided to you. When providing you with debt advice we collect and use your personal information under the lawful basis of our legitimate interest and it is necessary to enable us to provide you with the best advice possible.

To be able to provide you with Advice we need to collect certain categories of personal data such as:

- Contact details – so that we can contact you to deal with your enquiry
- The people you owe money to and your property and assets – so we understand your financial situation and can provide you with appropriate advice.
- Your Income and expenditure – to work out what you can afford to pay towards your debts and tell you which solutions are available to you.
- Personal circumstances – such as your employment, living arrangements and financial dependents, so that we can tell you which solutions are available to you provide advice which is suitable.
- Special personal information – only with your permission and where this is relevant to your financial situation

With your permission, we may obtain and use information from your credit file to confirm certain information about your debts and address history.

Our partners where we place your application and their regulators, such as the Financial Conduct Authority, the Information Commissioner's Office or any other regulatory body or authority may request certain information as part of supervising us. We have a legal or regulatory obligation to provide this.

If you have provided your authority, if we have a legitimate interest to do so or where we may be legally entitled to, we will share information with credit reference agencies to obtain information about your financial history or your credit commitments.

Providing you are happy with the solution discussed we will introduce you to a regulated third party debt solution company. We use a panel of companies depending on the solution you chose. We may share your information with any regulated debt partner:

If you do not go ahead with a debt solution your information will normally be deleted after 1 year, however if we introduce you to one of our debt partners to proceed with a debt solution then your information will be retained for six years. Telephone calls will be retained for 395 days

## Reviews and Market Research

Under our legitimate interests, where we have a copy of your personal information, or you have agreed to be contacted, we may contact you to ask you to provide a review about the services you've received. Although this information would really help us, you wouldn't be required to provide us with this information unless you were happy to.

## Legal or Regulatory Obligation

We will be required to process your personal information where we have a legal or regulatory obligation to do so, for example, to adhere to anti-money laundering regulations, financial crime, fraud and terrorist financing detection and prevention purposes, and any regulatory commitments set out by the Financial Conduct Authority.

## Responding to complaints or enquiries

If you make an enquiry or complaint with us, we will use your personal information to investigate the complaint and deal with your enquiry. We have a legal and regulatory obligation to deal with your complaint appropriately.

## Who will we share your information with?

In addition to the companies, organisations and other third parties set out in Section 3; we may also share your personal information with the following organisations:

Regulators such as the Financial Conduct Authority, the Information Commissioner's Office or any other regulatory body or authority may request certain information as part of supervising the entities where we place your application. We have a legal or regulatory obligation to provide this.

Technology/ IT Service Providers who provide IT platforms or other IT services

Communication providers (e.g. telephone line providers, and email and text service providers)

Third parties who may have introduced you to our services

These companies help us to provide our services to you. We will have a contract in place with any provider who directly provides us with such services to ensure that they comply with their data protection obligations and ensure that they have appropriate security measures in place.

We may also share your personal information where we have your consent to do so or where we're required to do so under a legal or regulatory obligation or court order, such as the police, local authorities or the courts.

## Fraud Prevention Agencies

The personal information we have collected from you may be shared with law enforcement agencies and fraud prevention agencies who will use it to prevent fraud, money-laundering and terrorist financing and to verify your identity.

## Social Media

We use publicly available social media platforms to promote our services, to provide updates and to share any news and promotional updates. We may collect personal information from these social media platforms, for example, if you post a message on our Facebook page. By providing any of your information to us through these platforms, you should be aware that:

the social media web pages are publicly available, and you must not provide any personal or sensitive information on our pages that are accessible to the public, such as your account information. We may ask you for your account information via a private message to identify you and to service any request you make; and

each social media platform will process any personal information you provide through the platform and will be processed in accordance with their own privacy policy. The privacy policies will be available to view on each social media platform.

## International Transfers

We will only send your data outside of the European Economic Area (EEA) to:

- Follow your instructions
- Comply with a legal duty
- Work with our outsourcing partners

If we do transfer information to our agents or advisers outside of the EEA, we will make sure that it is protected in the same way as if it was being used in the EEA. We'll use one of these safeguards:

Transfer it to a non-EEA country with privacy laws that give the same protection as the EEA. Learn more on the European Commission Justice website.

Put in place a contract with the recipient that means they must protect it to the same standards as the EEA. Read more about this here on the European Commission Justice website.

## Security

We take the protection of personal information very seriously, and we will maintain appropriate measures to maintain the confidentiality, integrity and availability of the information you have provided. Such measures include:

Company security policies and standards. Staff security awareness. Role-based access controls to prevent unauthorised access to the information. Encryption and anonymisation technology. Anti-malware technologies. Security monitoring. Secure archiving and deletion. Compliance with industry regulation and legislation.

How we may contact you about the products and services we provide you

To help us keep you up to date about the products and services that we provide to you and to ensure that you're kept fully informed we may contact you by letter, telephone, email, text message, push notifications, social media or may send you messages by any online customer platforms or other electronic means.

If you don't want to be contacted in a particular way, then you can request this at any time by contacting us, but if we are providing a service to you, we do need to be able to send you communications. This can often be due to a legal or regulatory requirement.

It is important that you keep us up to date when you change your contact details to ensure that we use your up to date contact information.

## Your Rights

Right to Access – You have the right to request access of the data we hold about you.

Right to Rectification – You have the right to request we correct any inaccurate information held about you

Right to Erasure – You have the right to request that we delete your personal information from our records. There may be occasions where we are unable to delete the data due to our legal or regulatory obligations. We will however discuss this with you if you request for your information to be deleted.

Right to Restrict Processing – You have the right to restrict how we use your personal information

Right to Object – You have the right to object to the collection and use of your personal data at any time.

Right to Portability – You have the right to request that your information you in a format that can be processed electronically.

How long do we keep your personal information for?

Whilst you continue to be our customer, we will keep a record of your personal information to ensure that we provide you with the best service possible and where we're required to keep your personal information to meet our legal and regulatory obligations.

If you do not go ahead with a debt solution your information will normally be deleted after 1 year however if we introduce you to one of our debt partners to proceed with a debt solution then your information will be retained for six years. Telephone calls will be retained for 395 days from the date the call was made.

After this time we will delete the information or anonymise the information so that it cannot be linked back to you.

## How we may contact you about other product and services

If you have provided us with your consent or if we are legally entitled to do so, we may contact you about other products and services that we offer which we think may interest you. We may do this through post, emails, text messages, telephone, social media or other electronic means.

You can easily let us know at any time if you would no longer like to receive these messages. You can contact us using the details below or by emailing us at [steve.gibbon@yourdebtsolution.co.uk](mailto:steve.gibbon@yourdebtsolution.co.uk)

## Other types of advertising

When you visit our website or similar websites, Google may use our advertisements promoting our products and services which, may appear on other third-party websites you visit across the internet for remarketing purposes, including cross-device remarketing. Google and other third parties will use cookies to tailor advertisements for website users based on their previous visit to our website. More information about cookies can be found below.

We do not have any control over the advertisements you see on other third party websites however you can request to opt out or customise these advertisements by using the Google Ads Preferences Manager.

## Recording Calls

We will record any telephone calls you make to us, or we make to you or any other third party. This is for training, monitoring and quality purposes and to meet ours and our partners where we may introduce your application for legal and regulatory obligations. Some telephone calls may be observed by staff for training and development purposes.

We will keep a copy of the telephone calls for 395 days from the date the telephone call was made.

## Contact us

If you have any questions or queries about how we use your personal information you can contact us or our Data Protection Officer using the address or email below:

## Data Protection Officer

Your Debt Solution Ltd, 71-75 Shelton Street, Covent Garden, London, WC2H 9JQ

If you are not happy with how we process your personal information you should contact us. If you're not happy with how we have dealt with your complaint, you have the right to make a complaint with the Information Commissioner's Office. You can find their details on their website at <https://ico.org.uk/>.

## Updates to this Privacy Policy

Any updates to this privacy policy will be found on this page. If we make any important or significant changes to the way in which we collect and use your personal information we will endeavour to notify you of this change

## Cookies

When using this website, some information may be collected automatically using 'cookies' or other similar technologies. These are small text files that facilitate the processing of your information and enable us to analyse how the website is being used. Some cookies are essential and are needed to ensure the website functions correctly, for example, to allow us to store the data you input during an application to allow for your application to be submitted. Other cookies may be non-essential, for example, to allow us to track the number of users to the website or for online advertising.

### Why are cookies used?

Cookies can be used for a number of reasons, including:

enabling us to recognise your device so that we can remember your log-in details and settings

providing advertising that is relevant and more interesting to you by collecting statistical and behavioural data

monitoring traffic to our websites to understand how they are being used and to ensure there's enough capacity to run fast

providing us with information about our website users, for example, which search engine a visitor used to find the website, how often they visit the website and how long they spend on the website.

You can turn cookies off. This won't stop a website from working, but it might mean it won't work as well as it could, or that you have to do the same thing more than once.

Last Updated 4th January 2023