

PRIVACY POLICY | First Credit Advice LIMITED

First Credit Advice Limited company number 8155619 and whose registered office is at Queens Court 9-17 Eastern Road Romford RM1 3NG (**'we', 'us' or 'our'**). We take the privacy of our customers very seriously. We ask that you read this Privacy Policy (**'the Policy'**) carefully as it contains important information about how we will use your personal data. Throughout this privacy policy, 'you' means the customer.

For the purposes of the Data Protection Act (**'DPA'**), we are the 'Data Controller' (i.e. the company who is responsible for, and controls the processing of, your personal data).

We are one entity and are not part of any group structure.

Information Commissioner's Office Registration Information;

- First Credit Advice Limited Limited – ICO Registration Number: **Z3299816**

Scope of the Policy

Our Privacy Policy only covers our websites, www.fcal.co.uk and our internal systems, controls and processes in how your personal data is used. The aims of our websites are to provide visitors with helpful information on solutions to Financial and Personal Injury Claim Management and Debt issues. The Policy covers the use of personal data by First Credit Advice Limited.

Your privacy is very important and we have set out below how we process any personal data collected from you or provided by you. If you access any other websites which may be linked to our websites, they are not covered by this Policy. We advise you to check the appropriate privacy policy when accessing linked websites.

Lawful Basis for Processing

Under the DPA there is a mandatory requirement for Data Controller's to set out what their lawful basis for processing personal data is.

First Credit Advice Limited Limited use a Legitimate Interest for the purposes of processing all personal data.

Legitimate Interest – Article 6(1)(f) of the GDPR – *“the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.”*

The Legitimate Interest relates to legal requirements for us to hold your personal data and financial information on record for up to a total of six years after which First Credit Advice Limited acted on your behalf. This six-year period satisfies the requirement of our regulators, The Financial Conduct Authority as well as the legal requirement to hold accounting information with Her Majesty's Revenue & Customs (HMR&C) and is also in line with other financial industry retention periods. Please also refer to a separate document – *“Legitimate Interest Assessment”* which can be provided by requesting it from us.

Personal data we may collect

We will obtain personal data about you, including your name, address, date of birth, contact information, information relating to any financial hardship, financial information not limited to creditors and debtors, income and expenditure from you (and in some cases, your household income) and those whose personal data of which you have express authority disclosed to us. By

submitting an online enquiry or making a telephone enquiry with us to enquire about the services that we offer, you agree to the terms of this Policy which include permitting us to contact you for the purposes of the enquiry via the contact method of which you provide us with the details of. e.g. email address, telephone number etc.

If you give us information about any third-party, you confirm that the third-party person has appointed you to act on his/her behalf and can provide evidence of such. This is also relevant where third-parties are concerned if you indeed ask another person to act on your behalf as a third party.

Under the third-party authorisation, the other person can:

- Give consent on his/her behalf to the processing of his or her personal data for the purposes and reasons set out in this Policy; and
- Receive on his/her behalf any data protection notices.

Such authorisation will remain in place until this has been revoked, either by verbal or written communication.

When you visit, register or access services on the websites you may be asked to provide certain information about yourself including your name, contact details and level of debt. We may also collect information about your usage of our websites as well as information about you from messages you post to the websites and e-mails or letters you send to us.

Use of Special Category data

We will obtain personal data when you (e.g. contact us for any reason or proceed with our services). In certain circumstances, we may hold special category data (also known as sensitive personal data) we will require this information in order to tailor our approach to how we can best assist you and your needs. For instance, you may have a medical condition which means that a third-party deal with your affairs, or you may have an impairment which would mean we would be best to contact you via a different method.

Any special category data held will be treated with the strictest of confidence and will be held purely based on your explicit consent to aid us in providing the best service to you. If you do not provide your explicit consent relating to any impairment or vulnerability, the information will not be recorded and will also not be disclosed to any third-parties.

Use of your information

Your information will enable us to provide you with access to all parts of our websites and to supply the services and advice you require. We will also use and analyse the information we collect so that we can administer, support, improve and develop our business and where necessary refer you to the most appropriate financial solution.

We may use your information to contact you for your views on our services and to notify you occasionally about important changes or developments to the websites or our services.

Furthermore, where you have consented, we might also use your information to let you know about other products and services we offer as well as those of carefully selected third parties which may be of interest to you or where they may offer services or solutions to improve your financial situation (also see *'Marketing & Opting-In'* below). If you change your mind about being contacted in the future, please let us know.

We will use the personal data you disclose to us for the purposes as described. These purposes include:

- to assist us in processing your enquiries and obtaining the services which you require;
- to help us identify you and any accounts that you hold with us;
- administration;
- fraud prevention and detection;
- customising our website and its content to your particular preferences;
- to notify you of any changes to our website or to our services which may affect you;
- security vetting; and
- Improving our services.

We may share your personal data with organisations as set out in the *'Disclosure of personal data'* section below. If you have opted-in to receive our marketing material, we will ensure that it is to your requirements and *granular*. We or they may contact you or other authorised third-parties (unless you have asked us or them not to do so) by mail, telephone, text message, email, (each contact method requires its own consent via an opt-in selection) The nature of these marketing communications relate to information on products and services which we believe may be of interest to you. If you would prefer not to receive any further direct marketing communications from us or our bus, it is possible to opt out at any time. See further *'Your rights'* below.

Disclosure of personal data

We may disclose personal data which you provide to us to:

- Our agents and service providers (e.g. providers of web hosting, maintenance services or creditors);
- Law enforcement agencies in connection with any investigation to help prevent unlawful activity;
- Our third-party affiliates in accordance with the terms of the Policy, specifically being:
 - finance companies with whom we deal for the purposes of providing our services to you; and
 - other third parties with whom we deal with in the course of providing our services to you; and
- Any regulators within whose jurisdiction we operate within from time to time.

Where we are making arrangements on your behalf we may need to pass your information to third parties to conclude those arrangements. For example, we may refer you to a finance broker if it appears that debt consolidation could form part of the solution to your debt issues.

Finally, if our business enters into a joint venture with or is sold to or merged with another business entity, your information may be disclosed to our proposed/new business partners or owners.

Please be aware that we will not sell or otherwise disclose any personal data provided to us to any other party.

Your Rights

You have the right to request access to your personal data which we process. This formal request is made under the DPA and is referred to as a Subject Access Request and is free of charge*. If you wish to exercise this right and make a Subject Access Request, you should;

- Put your request in writing; either by Email or by letter.

- Include proof of your identity and address (e.g. a copy of your driving licence or passport, and a recent utility or credit card bill);
- Specify the personal data you want access to, including any account or reference numbers where applicable.

You have the right to require us to correct any inaccuracies in your data free of charge. If you wish to exercise this right, you should:

- Either speak to us via telephone or put your request in writing;
- Provide us with enough information to identify you (e.g. account/order number, username, registration details); and
- Specify the information that is incorrect and what it should be replaced with.

Should you wish to unsubscribe from receiving our e-newsletters, blogs and technical updates simply click the “unsubscribe” link that is included at the bottom of every email we send you. You may also email info@fcal.co.uk with the subject line “Unsubscribe” and we will remove you from our newsletter within a maximum of 10 calendar days, but usually much sooner.

*Charges may apply to cover administration costs in order to prepare the release of the personal data where it is deemed to be excessive. This will be discussed with you if this is necessary.

International Transfers

In the normal course of business there may be a need for First Credit Advice Limited or any other firm associated to the business, usually when undertaking quality assurances assessments, personal data would have to be transferred outside of the European Economic Area (EEA) where those countries do not typically have the same protections and safeguards in place for the protection of personal data to those countries within the EEA.

We deal with a number of large, international corporations where data is likely to be transferred in this way. Assurances and processes will always be put in place and considered before any international transfer to a non-EEA country is undertaken to ensure the protection and security of the personal data.

Cookies

You should also read our [Cookie Policy](#) to find out more about how First Credit Advice Limited uses cookies, which is relevant to your online security.

Unsubscribing from our mailing lists

If you have shared your information with us including postal address, email address or home and mobile numbers and do not wish to receive communications and updates please notify us by email to info@fcal.co.uk and we will remove you from our marketing list immediately.

Security and data retention

We employ security measures to protect your information from access by unauthorised persons and against unlawful processing, accidental loss, destruction and damage. We will retain your information for a total of six years after we have ceased to act for you. If you make an enquiry with us, and we are not able to help you, for whatever reason, a record of your enquiry will be retained for 12 months.

We will take all reasonable steps to protect your personal information but cannot guarantee the security of any data you provide online. By using our websites and not advising us to the contrary,

you agree to our using data in the way set out above and to accept the inherent security risks of providing information online without holding us responsible for any breach of security unless due to our negligence or wilful default.

Changes to our privacy policy

Any changes to our privacy policy in the future will be posted to our sites and, where appropriate, through e-mail notification. This privacy policy was last updated May 2018.

Undertaking Anti-Money Laundering checks:

To comply with money laundering regulations, there are times when we need to confirm the identity of our customers in order to satisfy our requirements. To satisfy our requirements an electronic Anti Money Laundering check may be completed on our customers.

Contact

All comments, queries and requests relating to our use of your information are welcomed and should be addressed to The Operation Manager, First Credit Advice Limited, Queens Court 9-17 Eastern Road Romford RM1 3NG, by telephone on 08001700616 or email us at info@fcal.co.uk