

YOUR RIGHTS AS A DATA SUBJECT

RIGHT OF ACCESS

You have the right to request access to your personal data, to obtain confirmation that it is being processed, and to obtain certain prescribed information about how it is processed. You can do this by submitting an information request free of charge to our Data Protection Officer. The details of whom are at the end of this privacy notice.

RIGHT TO RECTIFICATION

If you find that any of the personal data is inaccurate or incomplete you have the right to ask for this to be corrected or completed.

RIGHT TO ERASURE (RIGHT TO BE FORGOTTEN)

In some circumstances you may ask us to erase your data from our system. Where you request this, we will make every attempt to comply, however, there are some situations whereby we would be unable to erase your data, such as;

- When you still want us to act on your behalf.
- When we need to comply with a legal obligation.
- When we may need to exercise or defend a legal claim.

Please note, this list is not exhaustive.

RIGHT TO RESTRICTION OF PROCESSING

If certain conditions apply, you have the right to restrict the processing of your information. This includes;

- When you contest it as being inaccurate (until the accuracy is proven);
- If you have objected to the data being processed but we need to decide if it was necessary for a legitimate interest.
- When processing your data has been unlawful but you decide against erasing your data.
- If we no longer need your data for the original purpose it was obtained, but you require us to hold it to establish, exercise or defend a legal claim.

RIGHT OF PORTABILITY

In certain circumstances you have the right to move, copy or transfer your personal data to another organisation. This works slightly differently to your rights of access as you may not be entitled to the same amount of information under the right of portability as you would be entitled to under the right of access.

RIGHT TO OBJECT

You can object to us processing your data unless;

- We can demonstrate legitimate grounds for processing your data such as you requesting that we continue managing your debt solution.
- The processing of your data is for the establishment, exercise of defence of a legal claim.

AUTOMATED DECISION MAKING

You have the right not to be subject to any decisions made solely by automated means. We will never make any automated decisions that will have any consequence to you or your debt solution.

CHANGES TO THIS PRIVACY NOTICE

This notice was last updated May 2018. We may amend this privacy notice from time to time to keep it up to date or to comply with legal requirements. If you have access to the internet, you should regularly check this privacy notice for updates. The privacy notice can be found at; www.angeladvance.co.uk/about/privacy If necessary, you may be notified of changes. The contact details that we hold for you will be used for this purpose, based on the legal basis of compliance with our legal obligations or legitimate interests.

HOW DO I CONTACT ANGEL ADVANCE ABOUT MY DATA?

We take data security seriously and we employ a series of measures to ensure that your data is kept safe. If you wish to find out more information about your personal data and how it is used, how it is kept safe, or you wish to exercise your rights as a data subject, you can contact our Data Protection Officer on the below details;

Data Protection Officer, Angel Advance, 850 Birchwood Boulevard, Birchwood, WA3 7QZ
EMAIL: DataProtectionOfficer@AngelAdvance.co.uk CALL: 01925 599400



PRIVACY NOTICE

You are a client of Angel Advance as you have consented for us to provide you with debt advice and provide you with a relevant solution for your debts. Your personal data is processed to help us provide you with a relevant solution. This Privacy Notice will provide you with the necessary information to explain how this data is collected, processed and stored with us.



WHAT IS THIS PRIVACY NOTICE ABOUT?

This notice will explain how we will use the personal data that we collect from you. It will also explain how this information is stored and used when you use our services. To provide you with a service, we need to collect certain information from you; if you would prefer that we did not have this information then we would not be able to carry out such a service and any account you hold with us would have to be closed.

WHAT DATA DOES ANGEL ADVANCE HOLD ABOUT ME?

In order to provide you with suitable advice and determine what solution would be applicable to you, we will need to hold the following information;

THE INFORMATION WE HOLD	WHY WE HOLD THIS INFORMATION
Your name and date of birth. Including proof of identity such as a copy of your Passport, Driving Licence or other widely accepted photographic ID	So we can address you properly and suitably identify you.
Contact details, including your address, telephone number, and email address.	So we can contact you in relation to the advice we will give you and any applicable solutions we may need to discuss.
In some cases we may need your previous contact details such as your previous address and any previous names you may have been known.	In case creditors do not hold your most up-to-date information, we can use this information to locate your debts.
Details of all your income(s), this may include any benefits or allowances that you're currently receiving.	
Details of all of your expenditures. This will include suitable proofs of priority bills such as your rent or mortgage, council tax payments and utility bills.	So we can prepare a financial statement which we can use to calculate what you can afford to pay to your creditors, and to provide you with advice about solutions for clearing your debts.
Details of your creditors, reference numbers, and the amount of money you owe	
Details of your household including marital status, number of dependents and if you're a home owner or tenant.	So we can ensure that any advice we give you takes into account any likely changes to your situation, and so we can provide you comprehensive information about how a debt solution may affect any assets you have.
Details of any assets you own including your home, motor vehicles, pensions or any other items of significant value.	

This information is collected so we can have as clear a picture of your situation as possible to enable us to offer you the best advice to deal with your financial situation.

WHO WILL MY INFORMATION BE SHARED WITH?

We will keep your personal information confidential and only share it with;

- Your creditors if you enter in to a debt solution with us.
- With any payment system we may use to process any payments you may make to us.
- With regulatory and governmental authorities, such as the Financial Conduct Authority, Financial Ombudsman Service or Institute of Chartered Accountants in England and Wales where we are requested to do so.
- Credit reference agencies in order to obtain credit reference information.

DOES ANGEL ADVANCE NEED PERSONAL INFORMATION ABOUT MY CHILDREN?

If you have children, we will ask if we can record their date/s of birth. This is to enable us to budget appropriately for them and anticipate and monitor any future changes that might occur due to their change in age e.g. if you stop receiving benefits relating to them, if they leave education or start further education, or if they start work and consequently start contributing to the household. You don't have to consent to us storing their dates of birth but we will need to ask their ages for budgeting reasons, and request that you keep us informed of any changes to your income or outgoings as it may affect your affordability.

WHAT IS THE LEGAL BASIS FOR USING MY DATA?

Prior to you signing and returning your authority form, we are allowed to process your data in order to take the relevant steps needed to enter in to a debt solution with you. Your authority form will give us ongoing

consent to process your data unless you enact one of your rights as listed in this notice.

We are also allowed to process your data without your consent if it is necessary to comply with the law or any other legal obligations. We may also process your data if it is in our legitimate interests, provided that such processing shall not outweigh your rights and freedoms.

WILL ANGEL ADVANCE NEED TO KNOW ABOUT MY SENSITIVE PERSONAL DATA?

Sensitive personal data can cover such things as:

- Health and disability
- Religious beliefs
- Sexual orientation
- Trade union membership
- Political opinions

In general, we will not need to record or have access to any of this data but we have detailed below some circumstances under which it may be useful to let us know.

If you pay a trade union membership fee or a political party membership fee we will ask you to include the cost in your expenditure to give a more accurate picture of your circumstances, but we will never ask you to disclose who your membership is with.

Certain health conditions and/or disabilities may affect how you deal with your finances or how we would deal with you. You are under no obligation to disclose any of these details but it is important to remember that disclosing this may prove beneficial for you.

If you do wish to divulge this information we will always ask your permission to store it on our system and ask if we can share it with your creditors. This will give you the option of making us aware so we can make any necessary adaptations to our arrangements with you, but without disclosing anything to your creditors. Certain religious practices, such as diet or specific prayer times, may have an effect on your expenditure or what times we can and can't contact you. We will never ask you to disclose your religious beliefs, however, if you decide to discuss this with us, we may be able to make adjustments to suit your specific needs.

HOW DOES ANGEL ADVANCE OBTAIN MY DATA?

If you sign up directly with us, the data we obtain will come mainly from you. We will take this information from you before we enter in to a solution with you.

We may receive personal data about you if you do any of the following:

- Submit or update information online through the customer portal
- Using our website or social media pages
- Contacting us through email, post, telephone or other means of communication
- Forwarding post to us that you have received from your creditors

If your debt management plan was transferred to us from another provider, we will have obtained most of your data from that company at the point of transfer. This would have been explained to you in your welcome letter. We will also collect data from your creditors relating to your debts such as balances and interest rates. It may also include historic information such as the date of any default notices or legal action that may have been taken. We may also obtain some data from public information registers such as the Insolvency Register or the Land Registry Office.

MARKETING FROM ANGEL ADVANCE

We will only use your personal data to recommend solutions that may be applicable to you. We will not forward your data to any third party company without your prior express consent.

When we recommend a solution, it will be your choice if you wish to follow the recommendation. We can pass your details to any other provider if you so wish, but this will only be done with your express prior consent.

HOW LONG IS YOUR PERSONAL DATA KEPT FOR?

Your data will be held and processed with us for the length of your arrangement with us. Once the arrangement has finished, or you have decided that you no longer require our assistance, your data will be held on our systems for a further 6 years. The reasons for this are;

- To respond to any future queries or complaints.
- For our internal research and statistical purposes.
- To comply with any legal obligations.

It may be possible to remove some of your personal information if you decide to exercise your rights as mentioned further on in this privacy notice.