

Ceverine

Privacy Policy

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This Privacy Policy sets out how Ceverine uses and protects your personal data. Ceverine may change this policy from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes. This policy is effective from 12 January 2021.

About Ceverine

Ceverine is a debt collection agency focusing on unsecured consumer credit and consumer receivables. We service customer accounts, which may be owned by a range of businesses, including retail banks, consumer credit and credit card companies, telecommunications companies and utilities.

Why we have access to and process your personal data

We maintain information, including personal data, for the purposes of managing accounts on behalf of the owner. This could include activities designed to support:

- Making the utmost effort to ensure our customer and account information is accurate. This involves regular data quality reporting, investigating data inaccuracies and making corrections should they arise;
- Arrears Management;
- Processing statutory documents, including Statements, Notice of Sums in Arrears and Notices of Default.

Tracing and debt recovery

We use data from Credit Reference Agencies (CRAs) and other 3rd party data providers to get updated contact information for the debtors, who are not responding using known contact details and to improve and enrich solutions offered to debtors.

An example of this activity could be when a customer moves home without informing the lender of their new address. We may then use the data we obtain from CRAs and other third-party data providers to inform our analytics to identify the customer's new address and contact details. We then use our analytics capability to help find unreachable individuals through updated addresses and contact details.

Credit reporting

We report the status of the accounts we own to the CRAs and any customer confirmed changes to contact details. The CRAs combine this data with that from other lenders to build a credit profile of an individual which in turn may be used to help inform future lending decisions.

An example would be where a customer settles their account with us. This information would be reported back to the CRAs which may be used by other lenders to assess an individual's creditworthiness.

Statistical analysis, analytics and profiling

We will use and allow the use of personal data for statistical analysis and analytics purposes. Personal data can be used to create scorecards, models and variables in connection with the assessment of credit, fraud, risk or to verify identities. It can also be used to monitor and

predict market trends, to allow use by Ceverine for refining recovery and trace strategies, and for analysis such recovery forecasting.

In accordance with our legitimate interest we may also undertake activities such as:

- Tracing;
- Scoring to ensure compliance with good debt collection practices;
- Enrichment of the data from different sources e.g. Credit Reference Agencies;
- Obtain data from suppliers where our legal grounds for processing permits us to do;
- Review historical cases we hold on you (from previous accounts serviced by us); and
- Search public registers.

We will verify that the data we hold on you is correct and share your data with approved third parties such as other debt collection agencies, process servers, solicitors and Credit Reference Agencies. Your data will be held securely in compliance with data protection legislation.

Our legal grounds for handling personal data

Our primary grounds for handling data are the legitimate interests of our business, supplemented by both the compliance with our legal obligation to manage customers' accounts and fulfil the terms of such contracts.

The UK's data protection laws allow the use of personal data where the organisations legitimate interests aren't outweighed by the interests, fundamental rights or freedoms of data subjects (customers). The law calls this the 'Legitimate Interests' condition for personal data processing. The below outlines the activities we undertake in relation to your data, the appropriate legal grounds for processing as well as an explanation of what our legitimate interests are when this is our reason for processing.

Interest	Reason(s) for Processing	Explanation
Managing your account	<ul style="list-style-type: none"> • Legitimate interests • Compliance with a legal obligation 	We have an obligation to appropriately manage your account in line with any credit agreement, and with respect to our duty to our clients.
Recovery of funds owed	<ul style="list-style-type: none"> • Legitimate interests • Compliance with a legal obligation 	<p>Our business is primarily the recovery of funds owed by individuals in the consumer credit and receivables market. As such, our customers typically have overdue funds that we are seeking to be repaid, either actively or by awaiting a change to customers' personal circumstances.</p> <p>This explicitly requires us to understand our customers and their circumstances in order to conduct ourselves in an appropriate way.</p>

<p>Promoting responsible lending and helping to prevent over-indebtedness</p>	<ul style="list-style-type: none"> • Legitimate interests 	<p>Responsible lending means that lenders only sell products that are affordable and suitable for the borrowers' circumstances. We help to ensure this by sharing personal data about our customers, their circumstances where applicable, and their financial history with the CRAs.</p> <p>A comprehensive range of regulatory and statutory measures exists in the UK to underpin the UK's financial services industry, which helps address the balance of our legitimate interests so that they aren't outweighed by the interests, fundamental rights and freedoms of data subjects. Further explanation about this balance is set out below.</p>
<p>Complying with and supporting compliance with legal and regulatory requirements</p>	<ul style="list-style-type: none"> • Legitimate interests • Compliance with a legal obligation • Fulfilment of a contract 	<p>We must comply with various legal and regulatory requirements and help other organisations comply with their own legal and regulatory obligations.</p>
<p>Maintenance of data for use in defending legal actions</p>	<ul style="list-style-type: none"> • Legitimate interests 	<p>We need to be able to investigate and respond to customer claims and to provide appropriate disclosure in the event of proceedings being issued. This requires it to maintain information for a period after its original legitimate purpose has expired.</p> <p>This is subject to the retention of personal information, described below.</p>
<p>Training and Quality</p>	<ul style="list-style-type: none"> • Legitimate interests • Compliance with a legal obligation 	<p>To ensure the good quality of the service we provide, customer data is used while training staff and reviewing the quality and output of ourselves and our partners.</p>

Our use of this personal data is subject to an extensive framework of safeguards that help make sure that people's rights are protected. These include the information given to people about how their personal data will be used and how they can exercise their rights to obtain their personal data, have it corrected or restricted, object to it being processed, and complain if they are dissatisfied. These safeguards help sustain a fair and appropriate balance so that our activities don't override the interests, fundamental rights and freedoms of data subjects.

The kinds of personal data we use, and how we source it

We obtain and use information from different sources, so we often hold different information and personal data about each customer. All information we hold about our customers falls into the below categories:

Information Type	Description	Source
Customer Identifiers	<p>We hold personal data that can be used to identify people; this includes:</p> <ul style="list-style-type: none"> • Name, including Title, Forename and Surname. • Address, including current and previous addresses, if these are marked as no longer resident. Additionally, we will hold address confirmed as inaccurate to prevent these being reused. • Contact details, including telephone and email information, past and present. Additionally, we will hold contact details marked as inaccurate to prevent these being reused. 	<p>This personal data is included with all the other data sources. For example, names, addresses and dates of birth are attached to financial account data, so it can be matched and associated with all the other data Ceverine holds about the relevant person.</p> <p>Data is first obtained from the lender of the debt. Data is also provided by customers directly in their daily interactions with us or our agents. Data about UK postal addresses is also obtained from sources like Royal Mail.</p> <p>We also obtain copies of the Edited Electoral Register containing the names and addresses of registered voters from local authorities across the UK in accordance with specific legislation.</p> <p>We also have access to public data sources on people and businesses, including from the Insolvency Service, Companies House, the CRAs and commercial business directories.</p>
Customer Circumstances	<p>We hold personal data relating to individual's circumstances including mental and physical health, financial status (including hardship) and difficulties relating to communication.</p> <p>The purpose of this information is to ensure all circumstances are taken into account when managing your account(s).</p>	<p>This information will be obtained from:</p> <ol style="list-style-type: none"> 1. You, the customer, during an interaction directly with Ceverine, 2. A third party you have authorised to work on your behalf, or 3. You, the customer, directly during an interaction with an agency working on our behalf. <p>We do not actively obtain data from external sources relating to customer circumstances.</p>

<p>Financial data</p>	<p>We receive information that includes personal data from credit accounts and other financial accounts that people hold with other organisations. This includes data about bank accounts, credit card accounts, mortgage accounts and other agreements that involve credit agreements such as utilities and communications contracts (including mobile and internet).</p> <p>The collected data includes the date the account was opened, the amount of debt outstanding (if any), any credit limits and the repayment history on the account, including late and missing payments.</p> <p>We may also receive data about financial accounts like current accounts, credit cards or loans and may receive payment information that businesses hold from the organisations who maintain other accounts belonging to you.</p> <p>We also use external data services from the CRAs to validate customers' stated income.</p>	<p>Banks, building societies, lenders and other financial services providers supply data including personal data about people's financial accounts and repayments to CRAs.</p> <p>Other credit providers, such as hire purchase companies, utilities companies, mobile phone networks, retail and mail order, and insurance companies also provide this data when they agree credit facilities with their customers to the CRAs.</p> <p>These are then provided to us with regards to our customers, to assist us in our legitimate purposes.</p>
<p>Court judgments, decrees and administration orders</p>	<p>We obtain data about court judgments that have been issued. This may include, for example, the name of the court, the nature of the judgment, how much money was owed, and whether the judgment has been satisfied. Additionally, we may receive information about enforcement taken, such as Charging Orders on properties held by customers.</p>	<p>Judgments and some other decrees and orders are made publicly available through statutory public registers. These are maintained by Registry Trust Limited, which also supplies the data on the registers to the CRAs, and in turn Ceverine.</p> <p>Charging Order information may also be provided by the Land Registry.</p>

<p>Bankruptcies, Individual Voluntary Arrangement (IVAs), debt relief orders and similar events</p>	<p>We obtain data about insolvency related events that happen to our customers and may also obtain this type of data about businesses. This includes data about bankruptcies, IVAs and debt relief orders, and in Scotland it includes sequestrations, trust deeds and debt arrangement schemes. This data includes the start and end dates of the relevant insolvency or arrangement.</p>	<p>We obtain this data from our customers, their representative (Insolvency Practitioner), The Insolvency Service, and the CRAs.</p>
<p>Search footprints</p>	<p>We have access to credit application information where a financial institution uses a CRA to make enquiries about a particular person, the CRA keeps a record of that enquiry which appears on the person's credit file.</p> <p>This includes the name of the application, the date, and the reason they gave for making the enquiry.</p> <p>Additionally, it may include such information as contact details, address information, income and employment situation of the applicant when they applied for the credit.</p>	<p>CRAs generate search footprints when enquiries are made about a particular person by other lenders. The lender making the enquiry provides some of the data in the footprint (such as the reason for the enquiry).</p> <p>We in turn obtain this information from the CRAs.</p>
<p>Scores and ratings</p>	<p>We will use the data they receive to produce scores and ratings including potential affordability, risk, fraud and identity checks, screening, collections, litigation and insolvency scores about our customers.</p>	<p>We produce their scores and ratings using the data available to them detailed in this section only.</p> <p>This is sometimes supplemented by CRAs' own scores.</p>
<p>Public interest data</p>	<p>We receive data from commercial sources which includes lists of politically exposed persons (PEPs) and sanctions data; this is to</p>	<p>We receive this data from reputable commercial sources as agreed from time to time.</p>

	ensure we meet our regulatory requirements.	
Other derived data	<p>We produce other kinds of data ourselves to manage our databases efficiently and ensure that all the relevant data about a person is on the correct credit file.</p> <p><i>Address links:</i> when we detect that a person seems to have moved to a different residence, it may create and store a link between the old and new address.</p> <p><i>Flags and triggers:</i> through analysis of other data, we can add indicators to a customer's account file. These aim to summarise particular aspects of a person's financial situation. For example, a Potential Insolvency flag protects those who may be insolvent by inviting additional checks as a defence against further fraud risk.</p>	Ceverine generates this data from the data sources available to them.

Who do we share your personal information with?

We may share your personal information with the following organisations:

- Third party agents and advisers who we use to administer your account, such as other debt collection agencies, tracing agents, process servers and solicitors.
- The creditor to comply with our obligations under the assignment (where we are the data controller).
- Credit Reference Agencies (CRAs).

Please refer to the CRA's information below:

- <https://www.transunion.co.uk/crain>
- <https://www.experian.co.uk/crain/index.html>
- <https://www.equifax.co.uk/crain.html>

In many circumstances, it will be necessary for Ceverine to continue processing data, to protect the rights of another natural or legal person, or because it's an important public interest of the union or member state. As CRA data is required to ensure responsible lending, it may be appropriate to continue processing data whilst a request for restriction is investigated.

- Ombudsmen, regulators and other authorities. This may include law enforcement agencies and other local and government agencies (including social and welfare organisations).
- Fraud prevention agencies.
- Ceverine's independent financial and professional advisors.
- Consultants or approved parties.
- Executors of an estate.
- Print and mail services.
- Land Registry.
- Legal advisors, insolvency practitioners and the courts in the event we pursue or defend legal actions in connection with your account.
- Your nominated Debt Management Company or third party appointed to act on your behalf.
- Approved subcontractors (suppliers who provide goods and services to us). Where this is necessary, we will take all appropriate steps to safeguard your data and relevant rights and freedoms under the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.
- Customer survey and research organisations to assist us in measuring your customer experience with Ceverine.

Our employees have been extensively vetted and will have access to your personal data. Access will be granted only if necessary, for the purposes described and only where an employee is bound by an obligation of confidentiality.

What categories of personal data we process about you and why?

We hold the necessary categories of personal data for the management of your account. To be able to communicate with you and to ensure correct identification, we process your name, date of birth, contact details such as address history, telephone number(s) and e-mail address.

In order to evaluate your ability to repay we process financial information such as your payment history, default details, credit history information, information on your debt, income, assets, credit agreements, loans and credit rating. This is processed in order to undertake risk analysis and risk management, to agree repayment plans, to assess affordability and your current circumstances.

To understand your circumstances and to make an informed decision on how to manage your account, we also process your reasons for non-payment subject to information you provide to us e.g. individual or family circumstances, work situation and/or any health conditions that may affect your ability to repay.

The personal data we hold is also required to enable us to pursue legal action and/or to obtain enforcement. Legal action is, however, used as a last resort having first exhausted all other available options to agree repayment. We also use your personal data to ensure good debt collection practices such as through scoring activities based on historic and performance-based information; by recording telephone conversations to train our employees and to document communications received from you.

We have a legal obligation to provide your personal data when we are audited by regulatory authorities to prevent, monitor and evidence any fraud, money laundering and other criminal activities.

As part of our corporate responsibility we also provide anonymised statistics, scorecards and analysis where your data may be used to assist in the accurate pricing of portfolios, or to assist in the identification of new customer contact strategies to enable us to ensure fair customer outcomes.

The information we hold on you may be anonymised and used for developing our business. However, where necessary to secure your personal data and to ensure appropriate development of and changes in our IT system, your personal data may be used on an “as is” basis.

Unless otherwise agreed with you or there is a legal requirement, we will not include special categories of personal information (see below).

Are you processing any sensitive data (special categories of data) on me?

Unless otherwise agreed with you or where there is a legal requirement, or Ceverine believes it is in your ‘vital interests’, we will not process special categories of personal information on you (often known as ‘sensitive personal data’ such as data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, and the processing of data concerning health or sex life).

It may however benefit you to notify us of any health condition, disability and/or personal information relating to your private life that may impact on your ability to repay your account. This will allow us to take reasonable steps to accommodate your needs or requirements such as allowing sufficient breaks in your payment arrangement, providing breathing space (suitable time) to seek free independent debt advice, or adjusting your payment arrangement.

This information will be used by us to assist you and will be kept as long as it is required for this purpose, or until such time as you notify us that you no longer consent to its processing or it is unnecessary for the establishment, exercise or defence of legal claims. This is not a blanket right and Ceverine will review your request to ensure its compatibility with Ceverine's legal grounds for processing.

When collecting any special categories of data disclosed by you in helping us understand your circumstances, we will obtain your specific and informed consent to process the data. We will also inform you at the point of capturing this data to whom the data will be disclosed. In most cases, this information may be disclosed to the original creditor as part of their ongoing auditing or as part of a dispute that you may raise that necessitates Ceverine sharing this data accordingly.

Withdrawal of consent

You have the right to withdraw your consent where Ceverine is processing your data using consent as the legal basis. In the context of administering your account, this legal basis is only likely to apply, where you have disclosed ‘special categories’ of personal data to Ceverine. We will (where our legitimate interest does not override this right) consequently stop processing the data.

Ceverine reserves the right to continue processing the data, where we believe that it would not be in your ‘vital interests’. For example, where Ceverine believes that to stop processing the data may result in significant harm to your well-being.

Do you have to provide us with your personal data?

Most (if not all) personal data that we process about you comes from another source other than yourself, such as the client, Credit Reference Agencies and approved data suppliers.

You may choose to provide us with additional personal data or special categories of personal data. Such information helps us to manage your account with due care and diligence for your benefit.

Will your personal data be transferred to another country?

Generally, your personal data will not be transferred outside of the UK. However, in cases of international debt collection, your personal data may be transferred to one of our representatives working in the relevant country.

Transfers under an exception

In the absence of an adequacy decision or appropriate safeguards, we may transfer personal information to a third country where an exception applies under relevant data protection law, e.g.:

- you have explicitly consented to the proposed transfer after having been informed of the possible risks;
- the transfer is necessary for the performance of a contract between us or to take pre-contract measures at your request;
- the transfer is necessary for a contract in your interests, between us and another person; or
- the transfer is necessary to establish, exercise or defend legal claims.

We may also disclose information to help prevent fraud, or if required to do so by law.

How long do we store your personal data?

We will retain your data as long as required for the lawful purpose for which it was obtained, as long as we have a legitimate interest to keep it e.g. to ensure good debt collection practices and to be able to defend ourselves against legal claims. We are also legally obliged to keep your personal data for a period of time to prevent and detect fraud, detect and evidence money laundering and for financial audits. For statistical purposes we will keep pseudonymised and anonymised data.

Where a debt is due and payable, this data will be retained until such time the debt is either extinguished (Scotland), paid (settled) or closed.

Data will be maintained in accordance with the following retention timescales:

- Customer data (including correspondence) will be retained for six years following account closure to allow for the defence of legal claims;
- Customer call recordings will be retained for a period of six months from the date of the call (this may be extended where a complaint or legal case necessitates the holding of the call recording for a longer period);
- Ceverine will process data for statistical purposes to help improve its debt collection practices. Where this is undertaken, personal details will be anonymised and retained for up to nine years;
- We will also delete your data in our backups, but only when the backup tape comes up for destruction, according to our backup policy. Data on backups will be retained for a period of five years.

Will you be subject to automated decision-making?

Ceverine uses automated decision making extensively to be able to reduce collection costs and improve customer experiences. You have the right to ask for a human to review an automated decision or profiling action where:

1. There has not already been a human intervention;
2. The decision or profiling is based solely on automated activity; and

3. The outcome of the profiling or decision making produces legal effects concerning you or similarly significantly affects you.

What rights do you have?

It is important you understand that it is your personal data that we process and that we want you to be comfortable with us doing so. Even if we do not need your permission to process your personal data, you have certain rights in relation to the processing of your personal data.

Your rights - what does it mean?

Right to be informed:

You have the right to be informed about the collection and use of your personal data. This is a key transparency requirement under the Data Protection Act 2018. Ceverine's Privacy Policy provides you with information including: our purposes for processing the personal data, retention periods for that personal data, and who it will be shared with.

Right to access:

You may request information on how we process your personal data, including information on:

- Why we process your personal data.
- What categories of personal data we process.
- Who we share your personal data with.
- How long we store your personal data or the criteria for determining this period.
- What rights you have.
- From where we have received your personal data (if we have not received it from you).
- If the processing includes automatic decision making (also known as profiling).
- If your personal data has been transferred to a country outside of the UK and EEA, how we ensure the protection of your personal data.

All the above information is available in this Privacy Policy.

You may also request a copy of the personal data we process about you. This is known as your Right to Access. Additional copies where considered manifestly unfounded may be combined with a fee or rejected where deemed appropriate.

Right to rectification:

It is important that we have the right information about you, so we encourage you to let us know if any of your personal data is incorrect, e.g. if you have changed your name or moved address.

Right to erasure (to be forgotten):

If we process your personal data in an unlawful manner, you may ask us to delete this information. It is however unlikely that we will delete your data unless you have settled the account, or it is closed.

Right to restrict processing:

From the time you have requested we correct your personal data or if you have objected to the processing, and until we have been able to investigate the issue or confirm the accuracy of your personal data (or changed it in accordance with your instructions), you may be entitled to the restriction of processing. This means that we (except for storing the personal data) may process your personal data only in accordance with your consent, if necessary, with reference to legal claims, to protect someone else's rights or if there is an important public interest in the processing.

In many circumstances, it will be necessary for Ceverine to continue processing data, to protect the rights of another natural or legal person, or because it's an important public interest. As CRA data is required to ensure responsible lending, it may be appropriate to continue processing data whilst a request for restriction is investigated.

Please note that once we believe that we have resolved the dispute or validated the accuracy of the data we hold; we will continue to process your data in accordance with our overriding legitimate interest.

Right to object:

If you believe that we do not have the right to process your personal data, you may object to our processing. In such cases, we may continue processing only if we can show our overriding legal grounds for processing out-weigh your rights and freedoms under the Data Protection Act 2018. However, we will process your personal data if it is required for the determination, exercise or defence of legal claims (note that this right only provides you with the ability to raise your objections, not a blanket right to have any and all processing ceased).

Right to data portability:

Where processing is based on your consent or for the performance of a contract and where the processing is carried out by automated means, you have the right to data portability. As outlined within this Privacy Policy, Ceverine will in most circumstances process your data under its legitimate interest to do so. As your account will be subjected to a manual review at periodic points throughout its lifecycle, our processing is not solely carried out by automated means. Whilst it is unlikely that this right will apply in the context of our processing, Ceverine will consider requests where you feel this right applies.

If you would like to exercise any of those rights, please:

- Send your request to hello@ceverine.com or Ceverine (UK) Limited, Suite 606, 8 Shepherd Market, London W1J 7JY; and
- let us have enough information to identify you e.g. your full name, address and Ceverine reference number;
- where we have not verified your identity let us have proof of your identity and address (a copy of your driving licence or passport and a utility bill); and
- let us know what right you want to exercise and the information which your request relates.

How to complain about the use of your data or exercise my rights?

If you wish to raise a complaint about how we handle your personal data, including in relation to any of the rights outlined above, you can contact our Data Protection Officer at Hello@ceverine.com or write to Data Protection Officer, Ceverine (UK) Limited, Suite 606, 8 Shepherd Market, London W1J 7JY and we will investigate your concerns.

If you are not satisfied with our response, or believe we are processing your data unfairly or unlawfully, you can complain to the Information Commissioner's Office (ICO). You can find further information about the ICO and their complaints procedure [here](#)

Security

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.