



## **Data Privacy Notice**

This Privacy Notice was reviewed and updated in March 2023.

Peak Collections Limited (“Peak”) takes data privacy seriously. It is committed to protecting your personal data and respects your privacy.

In the course of providing various services to you, or in the course of your employment/work with PEAK, we may process your personal data. Your personal data may include information like your name, email address or telephone number and processing could mean collecting, storing, using or disclosing your personal data.

PEAK is bound to comply with UK data protection law. This Privacy Policy forms part of PEAK’s obligation to be open and fair with all individuals whose personal data we process and to provide full information on how we process such personal data and what we do with it.

This Privacy Policy relates to the processing of your personal data by PEAK. Unless otherwise stated, all references to “PEAK”, “we” or “our” in this statement shall include all Peak Collections Limited entities that process personal data.

If you receive other services or products from PEAK, or use any of our specific websites or applications, you may be provided with further privacy notices or statements which may be contained in a separate supplemental policy or within our website/ application terms and conditions. These additional privacy notices or statements shall supplement this Privacy Policy.

### **Links to other websites**

This Privacy Policy only relates to processing carried out by PEAK. PEAK is not responsible for the processing of any personal data which you may provide directly to third parties. Third party websites accessed via a PEAK website or application are not covered by this Privacy Policy and any links to other websites have been provided merely for convenience.

### **What this Privacy Policy covers:**

- What personal data we collect about you
- How we collect your personal data
- What we use your personal data for
- Communications with you
- How we use cookies and other similar technology on our websites and applications
- When we may disclose your personal data
- How we protect your personal data and where we store it
- Your rights in relation to the personal data we collect
- How long we will hold your data for



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- How we update or change this Privacy Policy
- How you can contact us?

Please read the following carefully to understand our practices regarding your personal data and how we will treat it. Please note that none of the lists or examples below are exhaustive, nor will they be fully representative for every individual.

### **What personal data we may collect about you**

If you deal with PEAK in your private capacity or are referred by a lender, we typically process the following types of personal data about you:

- Personal details, such as name, date of birth, occupation, country of residence and agreement number, or equivalent.
- Contact details for your work and personal details, such as email address, postal address and/or telephone number.
- Identification documentation, such as a photocopy of your passport, driving license, ID card or other documentation required by law. Copies of these documents may include a photograph of your face and shoulders.
- Details of your visits to our websites and applications including, but not limited to, traffic data, location data and other communication data including emails and recorded calls, and the resources that you access.

If you deal with PEAK in your private capacity (which does not include employees, contractors, temporary workers or other personnel of PEAK), for example if you take part in PEAK recruitment, we typically process the following types of personal data about you:

- Personal details, such as name, date of birth, occupation, marital status, country of residence and national insurance number, or equivalent.
- Contact details for your work and personal details, such as email address, postal address and/or telephone number.
- Identification documentation, such as a photocopy of your passport, driving license, ID card or other documentation required by law. Copies of these documents may include a photograph of your face and shoulders.
- Information provided through our recruitment process.
- Details of your visits to our websites and applications including, but not limited to, traffic data, location data and other communication data, and the resources that you access.
- Details of your visits to our premises.

If you deal with PEAK in the capacity of an officer, representative, employee or director of one of our clients, we typically process the following types of personal data about you:

- Your name, work email address and other work contact details.
- Your role, position and/or job title within your employment.
- Your area of employment.



- In some circumstances, identification documentation, such as a photocopy of your passport, driving license, ID card or other documentation required by local law. Copies of these documents may include a photograph of your face and shoulders.
- Details of your preferences for types of marketing events.
- Details of your visits to our websites and applications including, but not limited to, traffic data, location data and other communication data, and the resources that you access.
- Details of any mobile devices you use to access our websites and applications including, but not limited to, the type of device and operating system.
- Details of your visits to our premises.

If you deal with PEAK in your capacity as an employee, contractor, temporary worker or other personnel, we typically process the following types of personal data about you:

- Personal details, such as name, address, date of birth, marital status, emergency contact details, country of residence, national insurance number, salary, bank details.
- Professional details, such as email address, postal address, telephone number, your CV, qualifications, relevant experience and skills.
- Identification documentation, such as a photocopy of your passport, driving license, ID card or other documentation required by local law. Copies of these documents may include a photograph of your face and shoulders.
- HR related records, such as training, performance assessments, absence and time-keeping records, disciplinary, grievance or capability proceedings, and background checks.
- Details of your access to our premises and to systems, software, websites, and applications including access and location data and communications data.

These types of personal data may include sensitive personal data.

We may also record telephone calls and store emails, application and internet logs in connection with your dealings with us. See section below 'When we record communications with you'.

In certain circumstances it may be mandatory for you to provide us with your personal data, to enable us to provide services to you or to comply with our legal obligations. In other circumstances, it will be at your discretion whether you provide us with personal data or not. However, failure to supply any of the personal data we may request may mean that we are unable to maintain or provide services or products to you or your employer and/or you may be unable to take part in any of our recruitment campaigns, or fully access and use our internal systems and resources.

PEAK makes every effort to maintain the accuracy and completeness of your personal data which it stores and to ensure all of your personal data is up to date. However, you can assist us with this considerably by promptly contacting us if there are any changes to your



personal data or if you become aware that we have inaccurate personal data relating to you (see section below 'Your rights in relation to the personal information data we collect'). PEAK shall not be responsible for any losses arising from any inaccurate, inauthentic, deficient or incomplete personal data or sensitive personal data that you provide to us.

### **How we collect your personal data**

PEAK usually collects your personal data from the information you submit during the course of your, or your employers, or your lenders relationship with us. This will typically be through the forms and documents used when you sign up to our marketing or market data news lists, are named as an authorised person to trade on behalf of your employer, sign up to access any of our products or services either on your own behalf or on behalf of your employer, take part in a recruitment campaign, when you become an employee, contractor, temporary worker or other personnel, or when we are dealing with you at the request of your lender or finance provider. We will also collect personal data when we monitor or record communications and/or through use of technology, please see further information set out below.

### **What we use your personal data for**

PEAK and/or persons acting on our behalf may process your personal data for any of the following purposes, depending on the capacity in which you deal with PEAK:

- to ensure the content on our websites and applications is presented in the most effective manner for you;
- for general HR administration, including payroll and benefits, training and development, performance management, sickness and absence management, grievance and disciplinary procedures, equal opportunities monitoring, business continuity planning;
- for internal finance management, including personnel expense reimbursement, travel and time-keeping;
- for monitoring and assessing compliance with PEAK's policies and standards;
- for promotional and marketing materials and activities, including photos and videos;
- to carry out money laundering, financial and credit checks and for fraud and crime prevention and detection purposes;
- to provide you with requested products or services;
- to identify persons authorised to trade on behalf of our clients;
- for administrative purposes in relation to the security and access of our systems, premises, platforms and secured websites and applications;
- to contact you about the services and products we offer;
- to consider your suitability for any of our current or future employment opportunities and to confirm your references and educational background;
- to comply with our legal and regulatory obligations and requests anywhere in the world, including reporting to and/or being audited by national and international regulatory, enforcement or exchange bodies;
- to comply with court orders and exercise and/ or defend our legal rights;
- to carry out services provided to our clients in dealing with their accounts



- for any other legitimate business purpose; and
- as otherwise permitted by any applicable law or regulation.

We may also use automated decision making processes in some circumstances.

### **When we record communications**

PEAK and persons acting on our behalf may record and/or monitor communications (including telephone conversations over landlines and mobile phones, emails, instant messaging, chat rooms, fax and other electronic communications) between our employees, agents, consultants, contractors or other personnel and non-PEAK personnel/ individuals (such as employees and customers of our clients). PEAK only does this to the extent

permitted by applicable law for legitimate business purposes or other purposes permitted by law. PEAK collects this type of personal data for several reasons including but not limited to:

- recording facts;
- complying with applicable law and regulation;
- complying with internal procedures and policies;
- facilitating administration and support;
- carrying out the services provided to our clients
- assisting with security, crime prevention and fraud purposes; and
- investigating or detecting unauthorised use, wrongful use or abuse of our services, systems or other materials.

### **How we use cookies and other similar technology on our websites**

We may collect information about your computer or mobile device, as applicable, including where available your IP address, device type, operating system and browser type, for system administration purposes. This is statistical data about our users' browsing actions and patterns, and does not identify any individual. We may also collect information about your general internet and application usage, and about your access to and use of any PEAK services made available to you/ your employer. This may be done through the use of cookies or any other similar technology, including technology that tracks and monitors your activities on some of our sites and systems.

### **When we may disclose your personal data**

PEAK does not and will not sell, rent or trade your personal data. We will only disclose your personal data in the ways set out in this Privacy Policy and in the following circumstances:

- To any entity within the PEAK group.
- To our clients.



- To third parties who process your personal data on our behalf (such as our systems providers, or employee payroll provider).
- To third parties who process your personal data on their own behalf but through providing us or you with a service on behalf of us
- To other financial institutions or regulatory bodies with whom information is shared for money laundering checks, credit risk reduction and other fraud and crime prevention purposes.
- To any third party to whom we assign or novate any of our rights or obligations.
- To any prospective buyer in the event we sell any part of our business or its assets or if substantially all of our assets are acquired by a third party, in which case your personal data could form part of one of the assets we sell.
- To any national and/or international regulatory, enforcement or exchange body or court where we are required to do so by applicable law or regulation or at their request.
- To any central or local government department and other statutory or public bodies (such as HMRC, DWP).

### **How we protect your personal data and where we store it**

PEAK is committed to safeguarding and protecting your personal data and maintains appropriate security to protect any personal data you provide us with from improper or accidental disclosure, use, access, loss, modification or damage.

We will take all steps reasonably necessary to ensure that your personal data is treated securely and in accordance with applicable law and regulation and with PEAK's policies and standards.

### **Your rights in relation to the personal data we collect**

If you wish to update or modify any of your personal data we store, access a copy of this personal data, or you would like us to stop processing any of your personal data which we hold, subject to applicable law, you can make such a request by writing to the address set out below. You may also request that we transfer your data to a third party of your choice, or to erase your data, subject to applicable law. We will process your request within the time prescribed by applicable law.

In any of the situations listed above, in order for us to comply with our security obligations and to prevent unauthorised disclosure of data, we may request that you prove your identity by providing us with a copy of a valid means of identification.

### **How long we will hold your data for**

We will only retain your personal data for as long as necessary to fulfill the purpose for which it was collected or to comply with legal, regulatory or internal policy requirements. However, if you wish to have your personal data removed from our databases, you can make such a request by writing to the address set out below. Subject to any legal or regulatory requirements, we will then delete this information.



## **How we update or change this Privacy Policy**

We may change or update parts of this Privacy Policy in order to maintain our compliance with applicable law and regulation or following an update to our internal practices. We will do this by updating the wording of this Data Privacy Notice or on our website, although, please be aware, you will not necessarily be directly notified of such a change. Therefore, please ensure that you regularly check this Privacy Policy so you are fully aware of any changes or updates.

## **How you can contact us**

If you would like to contact us in relation to this Privacy Notice or anything else in connection with the personal data we collect on you, including, without limitation, where you would like to update your personal data, would like a copy of the data we collect on you or would like to raise a complaint or comment, please contact us using the details set out below.

Email: [admin@peakcollections.com](mailto:admin@peakcollections.com)

The Data Protection Officer, Peak Collections Limited, Manson House, Shaw Street, Macclesfield, Cheshire, SK11 6QY.

## **How to complain**

If you have any concerns about our use of your personal information, you can make a complaint to us at the address above.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:  
Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1113 ICO website: <https://www.ico.org.uk>