

Data Protection Information Notice ("Fair Processing Notice")

1. **The Data Controller** of your personal data is PRA Group (UK) Limited located at PO Box 26249, Kilmarnock, KA3 1HA (*hereinafter "PRA" "we" "our" and "us"*). We are registered with the Information Commission and our registration number is Z6115807. Our registered office is Level 11, Riverside House, 2A Southwark Bridge Road, London, SE1 9HA.

Where your debt is not owned by PRA directly, PRA is appointed as a servicer on behalf of, and as authorised by, the legal owner of your debt, such as PRA Group UK Portfolios Ltd.

2. **Contact point** for matters concerning data protection or any questions you may have about this Notice:

- a) Post: PO Box 26249, Kilmarnock, KA3 1HA
- b) E-Mail: privacy@pragroup.co.uk

3. **Purpose of processing personal data and legal basis:**

Purposes of data processing	Legal basis
Collection of outstanding debts , including trace activities, payment processing, behavioural scoring, evaluation of your circumstances and financial situation including affordability to provide you with solutions, evaluation, facilitation and administration of remediation actions in respect of your outstanding debt	Article 6(1)(f) of the UK GDPR ¹ - we process your personal data based on our legitimate interest in debt collection Article 6(1)(f) of the UK GDPR - we process your personal data based on our legitimate interest to comply with rules and guidelines issued by regulatory authorities Article 6(1)(b) of the UK GDPR - we process your personal data based on performance of the terms of any payment or settlement arrangement that you may enter into in connection with such debt
Communicating with you , including customer support, complaints handling	Article 9(2)(a) of the UK GDPR - we process your personal data where you have given us your explicit consent to process special categories of personal data Article 6(1)(f) of the UK GDPR - we process your personal data based on our legitimate interest Article 6(1)(c) UK GDPR - we process your personal data where required or permitted by law
Marketing. We may communicate with you for marketing purposes. We may also profile your personal data for marketing purposes before we reach out to you, to ensure our communications are focused on services that meet your needs and interests	Article 6(1)(a) of the UK GDPR - we process your personal data based on your consent for one or more specific purposes Article 6(1)(f) of the UK GDPR - we process your personal data for marketing purposes based on our legitimate interest, where consent is not required by law
As a company, we use the data for our internal business purposes , i.e.: customer satisfaction monitoring, risk assessments, analysis, reporting and management information, due diligence and audits, market and product research, consideration and development of future business service offerings which support our customers' needs, compliance with contract terms (including portfolio acquisition contracts and third party partner contracts), ensuring the quality, efficiency and effectiveness of our processes , i.e.: optimisation and improvement of our debt collection processes, training and quality assurance of staff, administrative purposes, developing the IT tools we use (including teaching artificial intelligence)	Article 6(1)(f) of the UK GDPR - we process your personal data based on our legitimate interest
Evaluation of portfolios of debts - as part of this purpose, we may use your data as part of a larger data set to assist us in assessing risk and informing the valuation of other receivables portfolios	Article 6(1)(f) of the UK GDPR - we process your personal data based on our legitimate interest
Ensuring information security and counteracting violations of the law , including securing our IT systems and network, confidential information, and prevention and detection of crime	Article 6(1)(f) of the UK GDPR - we process your personal data based on our legitimate interest Article 6(1)(c) UK GDPR - we process your personal data where required or permitted by law
Processing necessary for the establishment, exercise or defence of legal claims	Article 6(1)(f) of the UK GDPR - we process your personal data based on our legitimate interest
Compliance with other obligations under the law	Article 6(1)(c) UK GDPR - we process your personal data where required or permitted by law

¹ the General Data Protection Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC applicable in the UK pursuant to the European Union (Withdrawal) Act 2018 ("UK GDPR")

4. Categories of personal data:

The scope of data that we obtain includes:

- a) information **relating to your identity** (e.g. first name, maiden name, last name, username or similar identifier, title, date of birth),
- b) information in order for **us to be able to communicate with you** (e.g. residential address, email address and telephone numbers, communication preferences),
- c) information relating to **your debt and payments** (e.g. bank account and payment card details),
- d) information about your **financial circumstances** (e.g. details about payments you have made to us as well as credit score and other flags and indicators that help us present you with suitable repayment options and/or financial products),
- e) information about **your personal circumstances** (e.g. marital status, dependants, heirs, employment and income).

5. Data sources:

- a) Personal data that we hold about you, where not collected from you directly, has been collected from **PRA Group UK Portfolios Ltd** or the **original creditor** identified in the notice of assignment provided to you when your debt was acquired.
- b) **We also obtain additional data in the course of servicing your debt.** This may be data about you or other people associated with you. Depending on the circumstances, we may obtain data of a spouse, heir, family member or joint and several debtor. Each case is different but here are some of the most common sources from which we obtain data:
 - i. Credit Reference Agencies (CRAs) and their affiliated companies;
 - ii. financial institutions, e.g. banks, insurance companies;
 - iii. fraud prevention agencies and law enforcement agencies;
 - iv. public information sources such as the Electoral Register, Companies House, published media and social networks;
 - v. Organisations you ask to share data with us, such as debt advice or debt management companies, another third party you have engaged to help support you with your debt or through a "tell us once" service or similar scheme In connection with **offering financial products that support your needs**, we may obtain additional information about your financial situation from external financial institutions, including banks, insurance companies, credit reference agencies and their affiliated companies.

6. Data recipients:

Your personal data may be shared with:

- a) the entity who is the legal owner of your debt;
- b) any of our related affiliates within the PRA Group of companies;
- c) CRAs. Information shared may be recorded by the CRAs in your credit history record. CRAs will record all outstanding debt and may disclose this information to other organisations to perform further checks, trace your whereabouts or recover a debt. If you pay your account in full then we will update the CRAs accordingly. From time to time, we may also ask a CRA to carry out a search for us and a record of that search may appear on your credit file, although any such record will only be visible to you and not any other parties. To read the Credit Reference Agencies' Information Notice ("CRAIN") explaining how CRAs process your personal data, please see the following web pages: (i) <https://www.experian.co.uk/legal/crain/>; (ii) <https://www.equifax.co.uk/crain/>; (iii) <https://www.transunion.co.uk/legal/privacy-centre>
For details on how you can contact the CRAs please visit our website at <https://pragroup.co.uk/cra> or contact us;
- d) any intermediaries or third parties who provide services to us, including companies used to send information to you or that provide us with support and technical assistance, IT service providers, debt collection agencies, law firms, insolvency practitioners, dispute resolution service providers and intermediaries determining the whereabouts of debtors, companies that assist us with market and product research, and to develop future business service offerings which support customers' needs;
- e) fraud prevention agencies and law enforcement authorities, including: Cifas, National Crime Agency, Action Fraud, Police, HM Revenue and Customs;
- f) land registries, courts, governmental and non-governmental regulatory bodies and ombudsmen to the extent required or permitted by law (including to comply with a legal summons or similar legal process or government request) or where we believe in good faith that disclosure of that information is legally required, or we have a legitimate interest in disclosing the information; for example, where it is necessary to protect our rights and property;
- g) to the original creditor of your debt or any party previously holding legal or beneficial title to your debt, or an agent appointed by them (for example to enable them to conduct audits on us);
- h) debt advice or debt management companies or with any other third party you have engaged to help support you with your debt.

7. Data transfers:

Your personal data may be **transferred to a recipient in a third country**. A third country is a country located outside the United Kingdom, including the United States of America and the European Economic Area. A third country may not have data protection laws equivalent to those in the UK. In such case, we will take all necessary steps to ensure the safety and security of your personal data in accordance with applicable data protection laws.

We may only transfer your personal data outside the UK if: (i) the UK Government has confirmed that the country to which we transfer the personal data ensure an adequate level of protection for your rights and freedoms; or (ii) appropriate safeguards are put in place such as binding corporate rules or standard contractual clauses approved for use in the UK.

At your request we will electronically provide you with a copy of the concluded contractual provisions and information on the scope of your personal data that has been transferred. Where necessary and upon explicit request, a paper copy of this information may be sent to you.

8. Data Storage:

Generally, your personal data will be retained by us while we service your outstanding debt until 6 years after your account is closed, however different periods for keeping your personal data will apply in the event that we need to:

- a) immediately cease to process your data after you withdraw your consent to our processing (to the extent that our processing is based on your consent for one or more specific purposes); or
- b) respond to any queries by you or any regulatory authority, including but not limited to the FCA or to comply with any legal, contractual and regulatory obligations which PRA may have, including those requirements imposed by HM Revenue and Customs, Information Commission and other governmental, law enforcement and regulatory bodies; or
- c) protect, establish or exercise our legal rights or defend against legal claims, including to collect a debt, or to comply with a legal summons, court order, legal process or other legal requirement.

Once the retention period has ended, we will either delete or anonymise your data. If we decide to keep some data for research, analysis purposes, or to improve our services, we anonymise it to prevent identifying you. This involves removing information such as your name, contact details, and other personal data that could lead to your identification. We have implemented additional measures to prevent re-identification. Our anonymisation processes are regularly reviewed to help ensure the security of your data. We do not use anonymised data to make decisions about you as an individual.

9. Your Rights.

We also inform you that, subject to restrictions under applicable regulations, you have the following rights:

- a) right to **access your personal data**;
- b) right to **rectification of your personal data**;
- c) right to **erasure** (right to be forgotten);
- d) right to **restriction of processing** - You have the right to request temporary limitation of the processing of your data. Please be informed that this right applies in specific circumstances listed in the UK GDPR;
- e) right to **data portability**;
- f) right to **object to processing** of your personal data based on our legitimate interest, including processing data for marketing purposes. An objection to the processing of data for marketing purposes does not require justification. In other cases, we will weigh your interests or fundamental rights and freedoms against our legitimate interests. Please be informed that we may refuse your request;
- g) right **not to be subject to a decision based solely on automated processing**, including profiling, which produces legal effects concerning you or similarly significantly affects you;
- h) right to **withdraw consent** – at any time. Withdrawal of the consent does not affect the lawfulness of the processing based on consent before its withdrawal. You can find our contact details in section 2 above;
- i) right to **lodge a complaint** if you consider that the processing of your personal data by us infringes your rights or applicable data protection laws. You can find our contact details in section 2 above;
- j) right to **lodge a complaint to the supervisory authority** if you believe that your personal data has been processed incorrectly. The relevant competent supervisory authority is the Information Commission, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. You can also complain using their website at <https://ico.org.uk>. Please note that the Information Commission now expects that you will have given us an opportunity to resolve your concerns, before raising the matter with them.

10. Profiling and automated decision making.

We sometimes analyse your account by comparing it with accounts that show similar payment, engagement and financial behaviours. This **profiling** helps us decide the most suitable ways to manage your debt and improve the services we offer. Profiling helps us also better understand your needs, to provide services that are more closely aligned with your individual circumstances. Profiling does not, on its own, have any legal impact on you.

In certain cases, we also use **automated decision-making**. Our system will review the information you provide—such as your proposed payment amount—and, if this amount falls within a pre-approved settlement range, the settlement will be automatically accepted without the need for human intervention. If you think the automated outcome is wrong or unfair, you can: (i) tell us what you think about the decision, (ii) ask for a real person to review the decision, (iii) ask us to explain how we made the decision, (iv) give us any additional information you want us to consider.

11. Requirement to provide personal data.

Providing your personal data to us is voluntary, except where the ground for the processing of personal data is a legal obligation, in which case providing your personal data is mandatory. To the extent that the processing of your personal data takes place for the purpose of concluding or performing a contract, failure to provide your personal data will result in the inability to conclude and perform the contract.

12. EU Representative.

We have appointed PRA Group Polska Holding sp. z o.o to act as our representative in the EU/EEA. Contact details for our European Representative are as follows:

- a) e-mail: eu_uk-dprepresentative@pragroup.eu
- b) post: Prosta 68, 00-838 Warsaw, Poland

13. Data Protection Officer.

Contact details for our Data Protection Officer are as follows:

- a) e-mail: privacy@pragroup.co.uk
- b) post: PO Box 26249, Kilmarnock, KA3 1HA