

Data Protection Information Notice ("Fair Processing Notice")

1. **The Data Controller** of your personal data is PRA Group UK Portfolios Ltd 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 ZB639961. Our registered office is Level 11, Riverside House, 2A Southwark Bridge Road, London, SE1 9HA.

Note that your personal data will be processed on our behalf by another data controller, PRA Group (UK) Limited, which is our servicer, or any other servicer appointed by us from time to time ("Servicer"). Further details of how our Servicer will process your personal data can be found in our Servicer's data protection information notice.

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
Supervision of the fulfilment of contractual obligations by PRA Group (UK) Limited as our Servicer in the collection of outstanding debts due to us as the creditor including administrative record-keeping in connection with the purchase and legal ownership of debts and placement of the debt with our Servicer	Article 6(1)(f) of the UK GDPR ¹ - we process your personal data based on our legitimate interest in collection of debts due to us 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 agree with our Servicer, acting on our behalf, in connection with your debt Article 9(2)(f) of the UK GDPR we process your personal data where it is necessary for the establishment, exercise or defence of legal claims
As a company, we use the data for our internal business purposes , i.e.: analysis, reporting and management information, audits, compliance with portfolio acquisition contract terms,	Article 6(1)(f) of the UK GDPR - we process your personal data based on our legitimate interest
When processing is 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

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 needed to **communicate with you** (e.g. billing 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),
- e) information about **your personal circumstances** (e.g. marital status, dependants, heirs, employment and income),

5. **Data sources:**

Personal data that we hold about you has been collected from:

- a) the **original creditor** identified in the notice of assignment provided to you when PRA acquired your debt,
- b) **our Servicer**.

6. **Data recipients:**

Your personal data may be shared with:

- a) our Servicer;
- b) any of our related affiliates within the PRA Group of companies;
- c) fraud prevention agencies and law enforcement authorities, including: Cifas, National Crime Agency, Action Fraud, Police, HM Revenue and Customs;
- d) to land registries, courts, governmental and nongovernmental regulatory bodies;

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 (hereinafter the "**UK GDPR**")

- e) to the original creditor of your debt or any party previously holding legal or beneficial title to your debt (for example to enable them to conduct audits on us).

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) respond to any queries by you or any regulatory authority or to comply with any legal, contractual and regulatory obligations which we may have, including those requirements imposed by HM Revenue and Customs, the Information Commission and other governmental, law enforcement and regulatory bodies; or
- b) 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.

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.
- 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.
- j) right to **lodge a complaint to 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. 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.

11. 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

12. 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