Hambury Tilmond Privacy Notice

Who we are & contact details

For the purposes of this Privacy Notice, references to The Company or we/us refers to Hambury Tilmond Limited, who are registered in England & Wales under company number 0810205, Registered Office address 90 London Road, Southend-on-Sea, Essex, SS1 1PG. Email info@hamburytilmond.co.uk. Telephone 01702 436032.

Should you require any further details regarding how we process your data, you should write to our Data Protection Officer.

Collecting of Personal information

Personal information means information or data from which someone else would be able to identify you as an individual. We collect personal information about our customers from our clients, approved tracing agents and credit reference agencies, publicly available data sites and any information customers provide to us. This information will be limited to name, contact details, reference number, Date of Birth, National Insurance number, Employment details, banking details, audio and video recordings, vehicle registration details and any other additional information you have provided to us in order to fulfil the service we have been instructed to carry out. We will only request information necessary for this task.

Call Centre Recording: To help improve efficiency and effectiveness of some of the services provided to you by telephone, we may keep a record of calls and SMS messages that you make to us.

Video Badges: In line with good practice within the enforcement industry our Enforcement Agents may record video of their interactions with you.

Legal Basis for Processing Your Information

Data Protection regulations says that we are allowed to use personal information only if we have a proper reason to do so. This includes sharing it outside Hambury Tilmond. The law says we must have one or more of these reasons:

- We have a contractual obligation
- We have a legal obligation
- We have a vital interest
- We need it to perform a public task
- We have a legitimate interest

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Who we share your information with

We may disclose your personal data to our instructing Clients and to third party agents who we use to facilitate collection of the debts we have been directed to collect, in order to fulfil a contract, where we have a legal obligation or where we have a legitimate interest to do so.

Hambury Tilmond may also share your personal information with the police and other government agencies for the purposes of crime prevention or detection.

If we disclose your information, we always ask the organisation to confirm the legal basis for their request, or that Hambury Tilmond is legally obliged to disclose it, and written authority is required to ensure we comply with the Data Protection Act.

We will never sell your data or share it for marketing purposes. We confirm we will not send your information outside the EEA.

How long we keep your personal information

Hambury Tilmond will not keep personal information for any longer than is necessary given the purpose or purposes for which that personal information was originally collected, held, and processed. The period of retention is generally limited to 6 years since the last contact but may be extended due regulation or legitimate business need. When personal information is no longer required, all reasonable steps will be taken to erase or securely dispose of it without delay.

Protecting your information

Hambury Tilmond have put measures in place to ensure that all personal information collected, held, and processed is kept secure and protected against unauthorised or unlawful processing and against accidental loss, destruction, or damage. Only those with a genuine need to access and use personal information and who are authorised to do so may access and use it. All technical and organisational measures taken to protect personal information are regularly reviewed and evaluated to ensure their ongoing effectiveness and the continued security of personal data.

Your legal rights

Under the UK GDPR, you have the right to:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be in a position to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.

How to get a copy of your personal information

You can obtain a copy of your personal information we hold by writing to the Data Protection Officer, Hambury Tilmond Limited, 90 London Road, Southend, SS1 1PG. This constitutes a Subject Access Request (SAR). There is no charge for obtaining a SAR unless your request is excessive or manifestly unfounded, but we will require proof of your identity before releasing the information.

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What if your personal information is incorrect?

You have the right to question any information we hold about you that you think is wrong or incomplete. Please contact us if you want to do this. If you do, we will take reasonable steps to check its accuracy and correct it.

Letting us know if you want us to stop using your personal information?

You have the right to object to our use of your personal information, or to ask us to delete, remove, or stop using your personal information if there is no need for us to keep it. This is known as the 'right to object' and 'right to erasure', or the 'right to be forgotten'. You can also withdraw any consent you have given. However, there may be legal or other official reasons why we need to keep or continue to use your data.
If you want to object to how we use your data or ask us to delete it or restrict how we use it, please contact us.

How to complain

If you have any concerns or complaints regarding the processing of your personal data please contact the Data Protection Officer, Hambury Tilmond Limited, 90 London Road, Southend, Essex, SS1 1PG, or email info@hamburytilmond.co.uk and your complaint will be investigated. Hambury Tilmond are registered with the information commissioner's office (registration Z3235969), and you also have the right to complain directly to the ICO (tel. 0303 123 1113) regarding the processing of your personal information.

Changes to this Privacy Notice

We reserve the right to amend or modify this Privacy Notice at any time. Any changes will be published on the website.

This Notice was last updated in November 2022