



## **DATA PROTECTION AND CONFIDENTIALITY**

### **PRIVACY POLICY**

Please read the following Privacy Policy to understand how we use and protect the information that you provide to us.

#### **Introduction**

Ditch Debt with Dignity are what is known as the 'Data Controller' of the personal data that you provide to us. We are committed to protecting the privacy of your personal information and are registered with the Information Commissioners Office (ICO), in order to make transparent our data handling practices.

We comply with the General Data Protection Regulation (GDPR) legislation (2018) which regulates the way in which we collect, handle and store personal information, both in paper and electronic form.

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements.

When you leave our website, we encourage you to read the privacy notice of every website you visit.

Ditch Debt with Dignity may choose to amend the content of this policy on occasion which will be posted on this website. Please visit this policy on a regular basis to make sure you understand what we do with your information.

By registering on this site, you consent to the collection, use and transfer of your information under the terms of this policy.

We reserve the right to amend or modify this Privacy Policy at any time and any changes will be published on the Site. The date of the most recent revision will appear on this page.

Ditch Debt with Dignity must be able to demonstrate that any personal data we handle is:

- processed lawfully, fairly and transparently
- collected for specified, explicit and legitimate purposes (Process Limitation)
- adequate, relevant and limited to what is necessary (Data Minimisation)
- accurate and kept up to date
- kept for no longer than is necessary (Storage Limitation)
- processed securely and protected against accidental loss, destruction or damage.

#### **Personal Data**

Ditch Debt with Dignity will only collect data that is adequate, relevant and necessary, and we go to great lengths to keep your personal data secure.

We collect the following personal data from you so that we can provide you with the various services and support available to help you manage your financial challenges. This involves



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engaging with creditors and other debt support agencies to help you deal with unmanageable debt:

- Personal data including name, address, date of birth
- Bank details
- Loan/Credit Information
- Employment details, including your salary and benefits
- Expenditure reports
- Health information
- Marital status and dependents
- Assets and liabilities
- Housing status

### **Storage of Data**

Clients details will be held electronically and in hard copy in the main office to ensure its security. All colleagues must comply with the following rules for handling Ditch Debt with Dignity information and equipment:

- Files and e-mails should be organised logically in folders for quick retrieval and reference
- Paper documents should not be left out where unauthorised people can see them
- When not required, paper or files should be kept in a locked drawer or filing cabinet
- Cabinets will be locked outwith office hours and the building is secured and alarmed.
- Password-protected screensavers that regularly activate must be used and passwords changed regularly
- Data must be backed-up monthly onto an external hard drive or disks
- All laptops are encrypted
- Laptops and any other owned equipment must not be left unattended in any public place.

### **Consent to Process Data**

Ditch Debt with Dignity must give clients a genuine and free choice to give their consent, and they must be able to refuse or withdraw their consent without detriment. However, If consent is not given then Ditch Debt with Dignity will not be able to provide full services and support to a client.

On these grounds we will require completion of a signed authorisation/mandate form from each client before any action is agreed to be taken on his or her behalf. We will also seek confirmation of what methods of contact are acceptable such as phoning at home or work, email and personal visitation, before any contact is made in these ways.

There are several grounds for the lawful processing of personal data including in order to:

- perform an employment contract
- comply with legal obligation
- protect someone's vital interests (eg medical data during a health emergency)
- carry out a task in the public interest



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- allow that it is in the legitimate interests of the business to do so

### Data Sharing

Any data held at Ditch Debt with Dignity will be for management and administrative use only and will not be released to a third party without first obtaining the written consent of any party concerned. However, in order to provide a robust and helpful support service, we are often required to communicate with your creditors and other complimentary debt management agencies, which involve us sharing your personal data. This is done so with your consent, but, on occasion, we are required by law to share your personal data. We will only share essential data and will ensure that any third parties are GDPR compliant.

### What are Your Rights?

Clients have the right to:

- be informed about the personal data that Ditch Debt with Dignity processes on you
- request access to the personal data that Ditch Debt with Dignity processes on you. This is called a 'Subject Access Request' and should be made in writing. No reason is required. This must be produced within 40 days from the date of receipt and provided free of charge. There is no restriction on the number of SARs a data subject can make.
- request rectification of your personal data immediately if it is incorrect or inaccurate, unless there is a regulatory requirement to retain the data.
- be forgotten – by requesting deletion or removal of your personal data, where there is no compelling reason to continue to process it.
- object to the processing of their data.
- to withdraw consent at any time by contacting Data Representative.

### Data Breaches

Personal data breaches must be reported immediately. If you wish to raise a complaint on how we have handled your personal data, you can contact our Data Representative to have the matter investigated. If you are not satisfied with our response, you can complain to the Information Commissioner's Office (<https://ico.org.uk>). This is the UK's supervisory authority for data protection issues.

Breaches could be:

- Letter or email sent to wrong client
- Laptop stolen or lost
- Paperwork lost or mixed up

Any breach of confidentiality or concern over data protection should be highlighted to the Data Representative – Wendy Fleming. Her contact details are [wendy.fleming@ditchdebtwithdignity.com](mailto:wendy.fleming@ditchdebtwithdignity.com).

There may be situations where there is good reason to break the basic rules of confidentiality. This might be where someone is at risk of serious harm or involved in some kind of illegal activity. In this situation the individual concerned will be, wherever possible, informed and an explanation of the action given.



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### **Data File Destruction**

Data should only be kept for as long as is necessary to fulfil the purposes for which it is collected, including satisfying any legal, accounting or reporting requirements. Casework and related documentation must be stored (either in electronic or hard copy format) for 6 years (12 years for mortgage arrears debt) from the closure of a client's case. After this period, paper destruction must take place securely and effectively, by shredding or incineration.

The recommendation (not a legal requirement) is that emails should be kept for only 6 months on an email client (e.g. Outlook). Important e-mails should be transferred to the client's case file.

### **Website Cookies**

Cookies are small amounts of information which we store on your computer. Unless you have indicated your objection when disclosing your details to us, our system will issue cookies to your computer when you log on to the site. Cookies make it easier for you to log on to and use our site during future visits. They also allow us to monitor website traffic and to personalise the content of the site for you. You may set up the browser on your computer to reject cookies although, in that case, you may not be able to use certain features on our Website. If you do not wish to receive cookies in the future, please let us know.