

How we use your personal information



This leaflet provides a summary of how we will use the personal information we collect about you, and the types of organisations we will share your personal information with.

You can also read our **privacy policy** for more information on how we will process your personal information. The privacy policy is on our website or you can contact us to ask for a copy of it. Our contact details are as follows.

Who we are and how you can contact us

Address	Gregory Pennington Limited Think Park Mosley Road Trafford Park Manchester M17 1FQ
Phone	0161 672 89 89
Email	PersonalFinanceManager@gregorypennington.co.uk
Website	www.gregorypennington.co.uk

Special personal information

Data protection law defines some categories of personal information as 'special categories of data'. This includes information about health, religious beliefs, race or ethnic background, political opinions, trade union membership or biometric data (that is, computerised details used to identify a person through their unique characteristics, for example through fingerprint scanning and facial recognition). We will only collect and store this information if we:

- Have agreed this with you first; or
- have a legal obligation to do so; and
- need to do so to provide our service.

What personal information will we collect about you?

To help us to provide our services, we will collect the following personal information.

- Your personal details (for example, your name and date of birth)
- Your address
- Your contact details (for example, your phone number and email address)
- **'Special personal information'** (see below), such as information about your health
- Financial information
- Employment information
- Information on how you use our website, products and services

Using your personal information

We can only use your personal information if:

- this is necessary to fulfil a contract we have with you;
- you have given us permission;
- we have to do so under any law or regulation;
- we need to do so to carry out a task which is in the public interest;
- we need to do so to protect your fundamental interests; or
- it is in our legitimate interest to do so and it is not against your rights.

We can only use personal information relating to criminal convictions or offences if we are authorised to do so by law.

How we use your personal information

This table explains more about how and why we may use your personal information.

How we may process your personal information	Why we process your personal information in this way
<ul style="list-style-type: none">• Assessing your circumstances and giving you advice about dealing with your debts• Negotiating new payment terms with your lenders and updating them about your circumstances and your debt management plan• Setting up and processing payments from you and to your lenders• Keeping you updated about your debt management plan• Responding to any complaints• Checking your personal information against information held by credit reference and fraud prevention agencies.	<p>To meet our contractual obligation to set up and manage your debt management plan, and to meet our legal and regulatory obligations.</p>
<p>Reviewing the service we have provided to you or carrying out marketing research</p>	<p>We have a legitimate interest in;</p> <ul style="list-style-type: none">• developing our products and services;• identifying where we may need to improve our service; and• understanding what you like about our services.
<p>Sharing information with regulators</p>	<p>We have a legal and regulatory obligation to provide information to our regulators if they ask us to do so.</p>
<p>Recording calls and storing your personal information</p>	<p>To meet our legal and regulatory obligations, we record our phone calls with you. We will keep copies of our calls and the other personal information we hold, usually for at least six years after you stop being our customer, or from the date of your last call.</p>
<p>Providing you with updates about other products, services and promotions</p>	<p>We will provide you with this information if you have agreed to receive it, or if it is in our legitimate interest to carry out direct marketing activities.</p>

Who we'll share your personal information with

The table below sets out who we may share your personal information with and why.

Who	Why
You and any joint applicants	<p>To keep you informed about your debt management plan, and to give you advice about managing your debt each time we review your plan.</p> <p>If your debt management plan is in joint names, we will also share your information with the person you share your plan with. If you don't want us to share your information in this way, tell us and we can set up a separate debt management plan in just your name.</p>
Your lenders	To help us try to agree new repayment terms and to update them about your circumstances and your debt management plan.
Banks and other financial institutions	To allow us to send and receive payments in connection with your plan.
Trusted business partners	<p>We will share your personal information with other companies whose services we need to use so we can provide our services to you. This will include IT service providers, professional advisors and insurers, communication service providers, printers, advertisers and social media platforms. We'll only share your information with them if they've agreed to keep it confidential.</p> <p>If your plan is covered by payment protection insurance or the income safeguard plan, we will tell the plan or policy provider about changes to your level of cover, the premiums you have paid or claims you have made.</p>
Credit-reference agencies and fraud-prevention agencies	<p>If you have given your permission, we are legally entitled or we have a legitimate interest in doing so, we will share information with credit reference agencies so we can get information about your financial history or your debts.</p> <p>The credit reference agency will add details of any searches to your credit record, which may then be seen by other organisations. You can find out more about how credit reference agencies use your personal information in the Credit Reference Agency Information Notice. This is set out in our Privacy Policy and is available from any of the three main agencies – Callcredit, Equifax and Experian.</p> <p>We will share your personal information with fraud-prevention agencies, who use it to prevent fraud, money laundering and funding terrorism.</p>

How we use your personal information

Where the personal information we hold about you comes from

As well as the information you provide when you apply for and use our services, we will also collect information from other parties, such as any joint applicants, your lenders, credit reference agencies and fraud prevention agencies.

With your permission, we will use information from your credit file, including information about your lenders, your accounts (including balances and account numbers), previous addresses and any past insolvency. We will also use details of any county court judgments (CCJs). The information from your credit file will be provided by Callcredit Consumer Ltd. The information about CCJs will be provided by Callcredit Ltd.

Using your information outside the European Economic Area (EEA)

We will only share your personal information outside the EEA if:

- You give us permission;
- any of the business partners we use process information for us outside the EEA; or
- this is necessary to meet our legal obligations.

If we do share your information outside the EEA, we will make sure it has the same protection as when it is used inside the EEA. You can find out more about how we can make sure your information is protected in our privacy policy and on the European Commission Justice website at:

(https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu_en).

Your rights

You have a number of rights over how your personal information is used. You can ask us to correct the information we hold, to delete it or not to use it in a particular way. You can withdraw any permission you have given, ask for copies of the personal information we hold about you or ask us to share it with somebody else. Our privacy policy has more information about these rights and how to use them.

If you're not happy with how we process your personal information

If for any reason you are not happy with how we are using your personal information, you should contact us. If you're not happy with how we deal with your complaint, you have the right to complain to the Information Commissioner's Office.

There is more information on the website at: (<https://ico.org.uk>)

