

ACCESS TO PERSONAL DATA

Subject Access Request (SAR):

You are entitled to access the information that we retain about you, in order to do so you must make a Subject Access Request (SAR).

Where Moorcroft is the owner of your account and therefore data controller of the account information, you must make your request directly to Moorcroft. We will begin to process request upon receipt, however In order to carry out your request we may require you provide **proof of your identity** in one of the following formats:

- A photocopy of a current valid driving licence
- A photocopy of a current passport;
- Or utility bill issued in the last three months
- Telephone our Contact Centre to complete our verbal security check.

While it is mandatory that we fulfil your request within one month of receipt, the guidance provided by the Information Commissioners Office (ICO) does state that this timeframe begins once the identity of the data subject has been verified.

You can request a SAR in writing at the following address:

The Data Protection Officer

PO Box 17

Moorcroft House

2 Spring Gardens

Stockport

SK1 4AJ

You may alternatively send your request via email: DPO@moorgroup.com

Or by telephone: 0161 475 2834

Where a SAR is considered manifestly unfounded or excessive (you have made multiple requests for data) we may decline to respond to your request or charge a proportionate fee. This would be in line with regulatory guidance.

Moorcroft will not provide copies of telephone calls or voice recordings unless specifically asked to do so. In this case we will provide all recordings between yourself and our telephone/ field operatives which have taken place in the past 3

months. Calls which pre-date this time frame may be requested specifically. Moorcroft operates a 3 year retention policy for telephone call and voice recordings.

Telephone call and voice recordings may be provided via email in the form of an encrypted digital file or via post in the form of an encrypted disc.

Statute requires that a SAR be fulfilled within one month from the date that it is received. Where Moorcroft Debt Recovery Limited is data controller of the information you are requesting we will endeavour to supply the information requested.

Where Moorcroft is an appointed agency instructed to collect debt on the behalf of our client we would normally be seen as the data processor. As such we would be obliged to follow the process stipulated to us by our client. We may be able to pass our request on to our client as the legal owner and data controller of the account we hold, who would fulfil the request on our behalf, providing all the data held by Moorcroft directly to you. In some instances however, you may be required to contact our client directly as the legal owner and data controller of the account with your Subject Access Request. Each Client's Subject Access Request process can be located on their website via their Privacy Policy. You can also email DPO@moorgroup.com and we will endeavour to provide our client's contact details directly to you.

When fulfilling a SAR Moorcroft must reserve the right not disclose information should it "adversely affect the rights and freedoms of others". This would apply for example with regards to our members of staff who are Data Subjects in their own right. As such some records may be redacted where third parties are detailed.

Please note that although we will seek to answer any and all legitimate queries, we must reserve the right to decline to respond to requests made within letters which we believe to be standard template letters based upon information supplied on specific web-sites.

However, we would confirm we would send an appropriate response to any such letters received and seek to fully explain matters

COMPLAINTS

If you wish to raise any complaint about how we are processing your personal information please contact us at the following address:

Compliance Department

PO Box 17

Moorcroft House

2 Spring Gardens

Stockport

SK1 4AJ

Or via email at: customerrelations@moorgroup.com

Please note that we will not accept any complaint where the content is abusive and threatening.

Should you remain dissatisfied with our response you are entitled to refer your complaint to the Information Commissioners Office (ICO) and details of how you can complain can be located on their website www.ICO.org.uk.