

MOORCROFT DATA SUBJECT RIGHTS REQUEST PROCEDURE

Erasure of Personally Identifiable Data (PII)

You are entitled in the following specific circumstances to request that we erase your personal data:

1. The data is no longer necessary in relation to the original purposes for which it was collected and processed.
2. The subject withdraws consent for the processing with which they previously agreed to (and the controller no longer has legal grounds for processing)
3. The data subject uses their right to object (Article 21) to the data processing and there is no overriding legitimate grounds for processing.
4. The controller and/or its processor is processing the data unlawfully
5. There is a legal requirement for the data to be erased
6. The data subject was a child at the time of collection

Enquiries relating to the Right to Erasure (Be Forgotten):

Where the account is acting as a Data Controller:

Moorcroft have a data retention schedule in place which is designed to be fully compliant and in line with all relevant regulations. We will process the data we hold on the basis that we have an overriding legitimate interest to do so and as such Moorcroft will not erase or cease to process data at the request of the data subject. However all requests will be reviewed on a case by case basis.

Where Moorcroft are acting as a Data Processor:

As Moorcroft are the Data Processor and our client remains the Data Controller, any decision to cease processing or permanently delete data would rest solely with our client. As such any request of this nature would need to be made directly to our client whose contact details will be available via their website.

Enquiries relating to the Right to Restriction of processing, including but not restricted to automated processing and profiling:

Where the account is acting as a Data Controller:

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Enquiries relating to the Right to Object to processing and auto decisions:

We sometimes use automated decision making and profiling in our processing activities, however this would not have a legal impact on an individual. We acknowledge a data subject's right not to be subject to automated decision making and profiling, should this activity have legal or similarly significant implications.

Enquiries relating to the Right to Object to profiling for the purposes of Marketing:

We do not share information for marketing purposes. Objection to profiling for the purposes of marketing will be exercised via opting out of marketing within original contracts with our client and or the original creditor.

Enquiries relating to the Right to Data Portability:

Moorcroft acknowledge a Data Subject's right to Data Portability.

Any further clarification regarding the above can be made in writing to:

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

We may require that you supply proof of ID with your written request, where you have not previously made contact via telephone to complete our verbal data protection checks.

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.

If you are not satisfied with our resolution of your concern then please contact the Information Commissioner's Office on 03301239765

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.