



Privacy Policy

How we will use your information



Please read the following Privacy Statement carefully, as it explains what personal information we collect about you and how we use this information.

Data protection law has changed in the UK with the Data Protection Act 1998 ('DPA') being replaced with the European General Data Protection Regulation ('GDPR') from 25 May 2018. This Privacy Statement explains how we process your information and your rights under GDPR.

The Debt Managers Standards Association Limited (DEMSEA) will use your information to:

- contact you to discuss your complaint against a member firm; or
- to undertake surveys relating to the conduct of our member firms; or
- to undertake quality assurance services on behalf of a member. This may be undertaken by a data processor on behalf of DEMSEA outside of EEA.

Where the service you have requested is provided on our behalf by a third party then we will notify you of that fact. We will treat all your Personal Information as previously defined by the Data Protection Act 1998 and the General Data Protection Regulation as confidential (although we reserve the right to disclose this information in the circumstances set out below). We will keep it on a secure server and we will fully comply with all applicable UK data protection and consumer legislation from time to time in place.

Where you provide the name(s) or other personal information about family/household members then you confirm that you have their consent to do so for the purposes set out in our Privacy Policy. For example, this may relate to a complaint about a joint Debt Management Plan being operated by one of our authorised members.

Any information that we collect and record is used to help us improve the quality of our service as a trade association, including electronic call recordings and secure messages between you and us.

We confirm that any Personal Information that we collect about you, from which we can identify you, is held in accordance with the requirements of GDPR. We use your information only for the following purposes:

- Delivering membership services as a trade association, which includes handling complaints about our members, undertaking surveys with customers of our members and undertaking quality assurance services on behalf of our members
- Debt administration and factoring
- To administer our websites
- Accounts and records
- For the prevention and detection of crime and the prosecution of offenders

We do not undertake marketing activities to individuals. Our members are regulated firms and individuals that have a qualification provided through DEMSEA where they have enrolled in a CPD programme. Sufficient information will be retained to allow on-going communication with an individual member to maintain their CPD programme.



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You should be aware that if we are requested by the police or any other regulatory or government authority investigating suspected illegal activities to provide Your Personal Information and/or User Information, We may be legally required to do so.

We do not use Cookies to personalise your experience on the DEMSA website at www.demsa.co.uk.

Any changes to this policy will be posted on our website.

Your rights under Data Protection Law

We operate under the European General Data Protection Regulation ('GDPR') from 25 May 2018.

The GDPR apply to 'personal data' we process and the data protection principles set out the main responsibilities we are responsible for.

We must ensure that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. accurate and where necessary kept up to date;
- e. kept for no longer than is necessary for the purposes for which the personal data are processed. We only retain personal data for the purposes for which it was collected and for a reasonable period thereafter where there is a legitimate business need or legal obligation to do so. For detail of our current retention policy contact our Data Protection Officer at DEMSA email address privacy@demsa.co.uk; and
- f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

We ensure lawful processing of personal data by obtaining consent or where processing the data is necessary for the purposes of our legitimate interests in providing appropriate member services. To meet data protection obligations, we have established proportionate governance measures.

Our Data Protection Officer (DPO) oversees compliance across the association through:

- a. implementing appropriate technical and organisational measures including internal data protection policies, associate training, internal audits of processing activities and reviews of internal policies.
- b. maintaining relevant documentation on processing activities.
- c. implementing measures that meet the principles of data protection by design and data protection by default including data minimisation, pseudonymisation, transparency, deploying the most up-to-date data security protocols and using data protection impact assessments across our association and in any third party arrangements.



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Your rights under Data Protection Law

You have a right to receive a copy of the personal data that we hold about you. We do not charge for this service.

To obtain a copy of the personal information we hold on you, please write to us at the address below or ring us on 0330 057 8532 and provide Us with Your details or ask for a Subject Access Request form.

Under GDPR, you also have a number of additional rights in respect of your personal data. The Information Commissioner's website provides guidance on these at www.ico.org.uk.

Questions regarding this Privacy Statement should be directed to:

Data Protection Officer
Debt Managers Standards Association Limited
11 Coopers Yard
Curran Road
Cardiff CF105NB

Under the **GDPR** you have the following specific rights in respect of the personal data we process:

1. The right to be informed about how we use personal data.

This Privacy Statement explains who we are; the purposes for which we process personal data and our legitimate interests in so doing; the categories of data we process; third party disclosures; and details of any transfers of personal data outside the UK.

2. The right of access to the personal data we hold. In most cases this will be free of charge and must be provided within one month of receipt.
3. The right to rectification where data are inaccurate or incomplete. In such cases we shall make any amendments or additions within one month of your request.
4. The right to erasure of personal data, but only in very specific circumstances, typically where the personal data are no longer necessary in relation to the purpose for which it was originally collected or processed; or, in certain cases where we have relied on consent to process the data, when that consent is withdrawn and there is no other legitimate reason for continuing to process that data; or when the individual objects to the processing and there is no overriding legitimate interest for continuing the processing.
5. The right to restrict processing, for example, while we are reviewing the accuracy or completeness of data, or deciding on whether any request for erasure is valid. In such cases we shall continue to store the data, but not further process it until such time as we have resolved the issue.



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6. The right to data portability which, subject to a number of qualifying conditions, allows individuals to obtain and reuse their personal data for their own purposes across different services.
7. The right to object in cases where processing is based on legitimate interests, where Our requirement to process the data is overridden by the rights of the individual concerned; or for the purposes of direct marketing (including profiling); or for processing for purposes of scientific / historical research and statistics, unless this is for necessary for the performance of a public interest task.
8. Rights in relation to automated decision making and profiling.

Please contact the our DPO for more information about the GDPR and your rights under Data Protection law.

If you have a complaint about data protection at the IET contact our data protection officer at In Control email.

Alternatively contact Our supervisory authority for data protection compliance (www.ico.org.uk):

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate)

About cookies

Cookies are pieces of information that a website transfers to your computer's hard disk for record-keeping purposes. Cookies can make the internet more useful by storing information about Your preferences on a particular site, such as Your personal preference pages.

We don't use cookies.

Links to other web sites

This Privacy Statement only covers the web services offered from this site. Other websites are governed by their own privacy statements.

Updates to this Privacy Statement

This Privacy Statement will be kept under continual review and changes may be made from time to time.

Updated: May 2018