



ANCHORAGE CHAMBERS PRIVACY POLICY

This privacy policy will apply to you if you provide your personal information to us, even if you decide not to go ahead with any product or service we offer. Within this privacy policy we have set out how we will use your personal data to provide service to you.

At Anchorage Chambers, we're committed to protecting and respecting your privacy. This Policy explains when and why we collect your personal information. The policy also explains how we use your personal information, the conditions under which we may disclose it to others and how we keep it secure.

Any questions regarding this Policy and our privacy practices should be sent by email to **compliance@anchoragechambers.co.uk** or by writing at **Anchorage Chambers, Anchorage House, 252 The Quays, Salford Quays, Salford, M50 3SD**. Alternatively, you can telephone on **0161 786 0917**.

If you are not happy with how we process your personal information you should contact us in the first instance. If you're not happy with how we have dealt with your complaint you have the right to lodge a complaint with the Information Commissioner's Office. You can find their details on their website at <https://ico.org.uk/>

WHO ARE WE?

We are Anchorage Chambers LTD, company registration number 09164704 whose registered office and trading premises are at Anchorage House, 252 The Quays, Salford Quays, Salford M50 3SD. We are a business which specialises in assisting people who have unmanageable debts to propose Individual Voluntary Arrangements (IVAs) to their creditors to resolve their financial difficulties. Our business administers IVAs from their commencement until their conclusion.

HOW DO WE COLLECT INFORMATION FROM YOU?

We obtain information about you when you use our website, for example, when you contact us about our services. We also collect information directly from you by email, SMS, WhatsApp, post or any other form of communication, and from companies or businesses who have advised you regarding your debts before you were introduced to us. We use publicly available online resources to obtain additional information and this is likely to include information for Anti Money Laundering purposes to confirm your identity and information from organisations such as H M Land Registry to confirm details of property ownership as well as other sources of information which may be directly relevant to your financial circumstances. Where online searches are completed, we will obtain your verbal and/or written consent from you or your initial adviser, first.

WHAT TYPE OF INFORMATION IS COLLECTED FROM YOU?

The personal information we collect is likely to include your date of birth, full name, any former names, gender, address, email address, employment details, and details of any dependants. We are likely also to collect information concerning your domestic and family circumstances which is directly relevant to your financial circumstances. We will also use this information to confirm your identity and to comply with anti-money laundering legislation.

We will also require information about your finances for example your bank account details, evidence of your household income and expenditure, details regarding ownership of assets e.g. property, cars or savings, and the names of your creditors, reference numbers and balances.



We may ask for your consent to obtain information from a third party reference agency to obtain information about your financial situation, including information about your creditors, their status, outstanding balances and account numbers.

Data protection law defines some personal information as “special categories of data”. This includes information about physical or mental health, sexual life, religious beliefs, race or ethnic origin, political opinions, trade union membership or biometric data. In some circumstances we may need to collect special personal data however we will only do so where it is necessary for the purposes of assisting with your financial situation or where we have a legal right to do so. Where we need to collect and process this type of data about you, by providing this information to us you give your explicit consent for us and any other third party to process this special data as set out in this privacy policy, unless we have a legal obligation to process this type of data.

When you contact us by telephone, your call may be recorded for training and monitoring purposes. We also keep any e-mail, or any other form of electronic communication, to help us to manage your IVA.

HOW IS YOUR INFORMATION USED?

We will use your personal information where it falls into some of one or more of the following categories:

- it is necessary to enter into or fulfil a contract we have with you;
- you have provided your consent;
- we have a legal or regulatory obligation to do so;
- it is necessary to carry out a task which is in the public interest;
- it is necessary to protect your vital interests; or
- it is in our legitimate interest to do so and it is not against your rights.

For example this may be to:

- prepare a statement of your financial position
- enable us to advise you if an IVA is an appropriate solution for your financial difficulties
- prepare your IVA proposal for consideration by your creditors
- monitor your ongoing compliance with your obligations once your IVA has been approved
- comply with our statutory obligations under the terms of the Insolvency Act 1986 and the Insolvency Rules 2016 and also to comply with best practice guidance issued by insolvency licensing bodies from time to time.
- seek your views or comments on the services we provide;
- notify you of changes to our services and also perform services for you in your best interest;
- send you communications which you have requested and that may be of interest to you.

DATA RETENTION

We will keep your data to ensure that we provide you with our services and comply with our legal and regulatory obligations. Your data will be stored for 6 years from the date that we cease to provide you with our services. We cannot delete this data if you ask us to because we are required to keep it by law. We will delete your data after the 6-year period.

If you do not sign your IVA proposal and your application stops there, we will delete your details or anonymise the data so that it cannot be linked back to you, 12 months after we close your file on our system.



WHO HAS ACCESS TO YOUR INFORMATION?

We will not sell or rent your information to third parties. We will not share your information with third parties for marketing purposes.

Your personal data will be shared with your creditors, their agents, debt collectors, bailiffs and solicitors dealing with the debts. This is key to allow us to provide the service we have agreed to provide you and also ensures that we comply with our regulatory obligations. If your IVA is accepted then details of about you and

Your IVA will be recorded on the Insolvency Register which is accessible by the public. The information we share includes your name, gender, date of birth and address. We have a legal obligation to supply this information. From time to time we may have to share your information with regulatory bodies. These include the Institute of Chartered Accountants in England and Wales, the Information Commissioners Office or any other regulatory body or authority who may request certain information as part of their supervisory role. We are under legal and regulatory obligations to provide this. We may from time to time need to instruct solicitors to assist with the administration of your IVA or to assist us with legal, regulatory and contractual obligations.

If you enter into a service jointly with another person (for example, interlocking Individual Voluntary Arrangements), your personal information and any information about the service provided to you will be shared with the other person.

We may also share your personal information where we have your consent to do so, or where we are required to do so under a legal or regulatory obligation, for example where we are required to do so by a court order, the police, local authorities or the courts. We might share some of your information with the emergency services if we think you are in any immediate danger.

The personal information we have collected from you may be shared with law enforcement agencies and fraud prevention agencies who will use it to prevent fraud, money-laundering and terrorist financing and to verify your identity. If fraud is detected, you could be refused certain services, finance or employment. Further details of how your information is used by us and these fraud prevention agencies, and your data protection rights, can be found by contacting us or email us at

THIRD PARTY SERVICE PROVIDERS WORKING ON OUR BEHALF

We may pass your information to our third party service providers, agents, subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf (for example to assist with preparing financial projections for your business, or our IT Service Providers who provide IT platforms or other IT services). However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own direct marketing purposes.

When you are using our telephone or online payment process, your payment is processed by a third party payment processor, who specialises in the secure online capture and processing of credit/debit card transactions. If you have any questions regarding secure transactions, please contact us.

We may transfer your personal information to a third party as part of a sale of some or all of our business and assets to any third party or as part of any business restructuring or reorganisation, or if we're under a duty to disclose or share your personal data in order to comply with any legal obligation or to enforce or apply our terms of use or to protect the rights, property or safety of our supporters and customers. However, we will take steps with the aim of ensuring that your privacy rights continue to be protected.



HOW YOU CAN ACCESS AND UPDATE YOUR INFORMATION

The accuracy of your information is important to us. We're working on ways to make it easier for you to review and correct the information that we hold about you. In the meantime, if you change your email address, or any of the other information we hold is inaccurate or out of date, please email us at: compliance@anchoragechambers.co.uk or write to us at: Anchorage Chambers, Anchorage House, 252 The Quays, Salford Quays, Salford, M50 3SD. Alternatively, you can telephone us on 0161 786 0917.

You have the right to ask for a copy of the information Anchorage Chambers hold about you. This is often called a "Data Subject Access Request" and this will be provided to you on request without charge. If you require a copy of the information Anchorage Chambers holds about you, please email at: compliance@anchoragechambers.co.uk or write to us at: Anchorage Chambers, Anchorage House, 252 The Quays, Salford Quays, Salford, M50 3SD.

Before providing this information to you or to another person or company where you have requested this personal information to be sent to, we may ask for proof of identity or ask sufficient questions to enable us to locate the information and ensure that we're only providing it where you have given your agreement.

You may request that your personal information is deleted or that we stop processing the information if we're no longer entitled to process it. There may be occasions where we are unable to delete the data due to our legal or regulatory obligations. We will however discuss this with you if you request for your information to be deleted.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

SECURITY PRECAUTIONS TO PROTECT THE LOSS, MISUSE OR ALTERATION OF YOUR INFORMATION

We take the protection of personal information very seriously and we will maintain appropriate measures to maintain the confidentiality, integrity and availability of the information you have provided. Such measures include:

- company security policies and standards
- staff security awareness
- role based access controls to prevent unauthorised access to the information
- encryption and anonymisation technology
- anti-malware technologies
- security monitoring
- security testing
- secure archiving and deletion
- compliance with industry regulation and legislation

Non-sensitive details (your email address etc.) are transmitted normally over the Internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk.



PROFILING

We may analyse your personal information to create a profile of your interests and preferences so that we can contact you with information relevant to you. We may make use of additional information about you when it is available from external sources to help us do this effectively. We may also use your personal information to detect and reduce fraud and credit risk.

USE OF 'COOKIES'

Like many other websites, the Anchorage Chambers website uses cookies. 'Cookies' are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. They collect statistical data about your browsing actions and patterns and do not identify you as an individual. This helps us to improve our website and deliver a better more personalised service.

It is possible to switch off cookies by setting your browser preferences. Turning cookies off may result in a loss of functionality when using our website.

LINKS TO OTHER WEBSITES

Our website may contain links to other websites run by other organisations. This privacy policy applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website.

In addition, if you linked to our website from a third party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and recommend that you check the policy of that third party site.

TRANSFERRING YOUR INFORMATION OUTSIDE OF THE UK

Our services are only provided to individuals in the United Kingdom. We will not transfer any personal information we hold about you outside of the UK.

This Policy will be reviewed on an annual basis.