

# North Insolvency Limited

## Privacy Notice

Effective from 1 December 2023

The following information is provided to comply with the requirements of the General Data Protection Regulation.

This privacy statement describes why and how we collect and use personal data and provides information about individuals' rights. It applies to personal data provided to us, both by individuals themselves or by others. We may use personal data provided to us for any of the purposes described in this privacy statement or as otherwise stated at the point of collection.

<b>Identity and contact details of the controller and where applicable, the controller's representative and the data protection officer</b>	<p>Where an insolvency practitioner of North Insolvency Ltd is not appointed as office holder, the data controller is either the company/individual on whose instructions North Insolvency Ltd is acting or it is North Insolvency Ltd. The contact details of North Insolvency Ltd are: 264 Banbury Road, Oxford, OX2 7DY, tel. 01865 292200, email: <a href="mailto:hayley@northinsolvency.co.uk">hayley@northinsolvency.co.uk</a></p> <p>Where an insolvency practitioner of North Insolvency Ltd is appointed as office holder and the data processing is carried out as part of their statutory duties, the office holder is the data controller. The Insolvency Practitioner can be contacted at: North Insolvency Ltd, 264 Banbury Road, OX2 7DY, tel. 01865 921570, email: <a href="mailto:hayley@northinsolvency.co.uk">hayley@northinsolvency.co.uk</a></p>
<b>How we use your personal information</b>	<p>We collect information about you in order to:</p> <ul style="list-style-type: none"><li>• deliver services to you</li><li>• perform our contract with you</li><li>• carry out identity and anti-money laundering checks</li><li>• ensure we are providing appropriate services to you</li><li>• provide you with information, products or services that you request from us or which we feel may interest you</li><li>• notify you about changes to our services</li><li>• comply with our legal obligations</li><li>• to collect information from credit reference agencies and fraud prevention agencies</li><li>• maintain our records for administrative purposes</li></ul> <p>Where we are required to obtain your consent for any of the above, we will obtain it. Otherwise, we will be relying on our legitimate business interests to use your data, or using your data to perform our contract with you or comply with our legal obligations.</p>
<b>Lawful basis for the processing</b>	<p>Most processing is carried out to comply with our legal obligations under statute and other regulatory obligations related to the insolvency process. We also believe our processing is for the legitimate interests of all stakeholders in the insolvency process, as</p>

	<p>they are entitled to be kept informed and may wish to engage in the insolvency process. Where North Insolvency Ltd has engaged with a client to perform a service, we will be required to process data to provide the service in accordance with the contractual terms.</p>
<p><b>What personal information we hold</b></p>	<p>We collect information about you when you register with us or engage us to provide products or services, or otherwise when you do business with us. We also collect information when you voluntarily complete customer surveys, provide feedback and participate in competitions. We will collect some or all of the following information from you:</p> <ul style="list-style-type: none"> <li>• Your name</li> <li>• Your postal and email address and telephone number(s)</li> <li>• Your date of birth</li> <li>• Financial information including taxation affairs and you National Insurance number</li> <li>• Your family members</li> <li>• Information relevant to the [products or] services you engage is to provide</li> <li>• Information relevant to the products or services you provide to us</li> <li>• Information you provide to us when you register for events or to receive other communications from us</li> <li>• We may also obtain information about you from other sources in order to help us provide the required services or comply with our legal and regulatory obligations, for example for anti-money laundering purposes</li> <li>• Your internet protocol address, operating system and web browser of visitors to our website. The IP address indicates the location of your computer on the Internet and may be used to provide statistical information about the users of our website. This information does not include data identifying you as an individual</li> <li>• Website usage information is collected using cookies – please see our cookie policy for further details.</li> </ul> <p>If you share other people's data with us, you will need to check that person consents to you providing that information to us.</p>
<p><b>Who we share our data with</b></p>	<p>We may use third parties located in other countries to help us run our business. As a result, personal data may be transferred outside the countries where we and our clients are located.</p> <p>This includes countries outside the EU and countries that do not have laws that provide specific protection for personal data.</p>

	<p>We have taken steps to ensure all personal data is provided with adequate protection and that all transfers of personal data outside the EU are done lawfully. Where we transfer personal data outside of the EU to a country not determined by the European Commission as providing an adequate level of protection for personal data, the transfers will be under an agreement which covers the EU requirements for the transfer of personal data outside the EU.</p> <p>Personal data held by us may be transferred to:</p> <p><b>Third party organisations that provide applications/functionality, data processing or IT service to us</b></p> <p>We use third parties to support us in providing our services and to help provide, run and manage our internal IT systems. For example, providers of information technology, cloud based software as a service providers, identity management, website hosting and management, data analysis, data back-up, security and storage services. The servers powering and facilitating that cloud infrastructure are located in secure data centres around the world, and personal data may be stored in any one of them.</p> <p><b>Third party organisations that otherwise assist us in providing goods, services or information</b></p> <p><b>Auditors and other professional advisers</b></p> <p><b>Law enforcement or other government and regulatory agencies or to other third parties as required by, and in accordance with, applicable law or regulation</b></p> <p>Occasionally, we may receive requests from third parties with authority to obtain disclosure of personal data, such as to check that we are complying with applicable law and regulation, to investigate an alleged crime, to establish, exercise or defend legal rights. In addition, as part of our statutory duties, we may be required to share some personal data with government agencies (e.g. Companies House and the Insolvency Service) and this may result in some data being made available by these agencies in the public domain. We will only fulfil requests for personal data where we are permitted to do so in accordance with applicable law or regulation.</p>
<b>Marketing</b>	<p>We would like to send you information about products and services of ours and other companies in our Group which may be of interest to you.</p>

	<p>If you have consented to receive marketing, you may opt out at a later date.</p> <p>You have a right at any time to stop us from contacting you for marketing purposes.</p> <p>If you decide to opt out and stop receiving our marketing information, we will add you to a 'do not contact' list against which we screen all our marketing. The list is ring-fenced and used only for the purpose of ensuring that we comply with your request and that you are not added back into our lists at a later date.</p> <p>If you no longer wish to be contacted for marketing purposes or wish to change your preferences, please email <a href="mailto:hayley@northinsolvency.co.uk">hayley@northinsolvency.co.uk</a></p>
<b>How long we retain your personal information</b>	<p>We will retain your personal data only for so long as we need it to perform our contract with you, to comply with our legal and regulatory requirements and otherwise in accordance with the minimum period as directed by our supervisory body - Insolvency Practitioners Association. Different retention periods apply for different types of data. For further information, please see our <a href="#">Data Retention Policy</a>.</p>
<b>Your rights</b>	<p>Under the UK GDPR and The Data Protection Act 2018 (DPA) you have a number of rights with regard to your personal data.</p> <p>You have the right to ask us not to process your personal data for marketing purposes. If you have provided consent for the processing of your data, you have the right (in certain circumstances) to withdraw that consent at any time which will not affect the lawfulness of the processing before your consent was withdrawn.</p> <p>You may also have a right to:</p> <ul style="list-style-type: none"> <li>• request a copy of your information</li> <li>• correct any mistakes in your information</li> <li>• ask for your personal data to be erased</li> <li>• restrict processing</li> <li>• request data in a machine-readable re-useable form</li> <li>• object to data processing</li> </ul> <p>Please note these rights are not absolute and on occasion these rights may be overridden by our need to comply with our legal obligations. If you would like to exercise any of your rights</p> <ul style="list-style-type: none"> <li>• please contact: <ul style="list-style-type: none"> <li>○ Hayley Simmons North Insolvency Limited 264 Banbury Road Oxford OX2 7DY <a href="mailto:hayley@northinsolvency.co.uk">hayley@northinsolvency.co.uk</a></li> </ul> </li> <li>• let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and</li> <li>• let us know what right you are exercising and the data it relates to.</li> </ul> <p>If you complain to us and you are not satisfied with our response or believe we are processing your personal data not in accordance with the law, you can contact the Information Commissioner's Office (ICO). This link will take you to the ICO's website: <a href="https://ico.org.uk/">https://ico.org.uk/</a></p>

<b>Cookies</b>	<p>Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of the website and to compile statistical reports on website activity. For further details on how we use cookies please refer to our <a href="#">Cookie Policy</a>.</p>
<b>Right to withdraw consent</b>	<p>Where an insolvency practitioner is appointed the data received was based upon obtaining consent and therefore the right to withdraw consent does not apply. Where an Insolvency Practitioner is not appointed the right to withdraw consent may apply.</p>
<b>Changes to our privacy statement</b>	<p>We keep this privacy statement under regular review and will place any updates on our website. Paper copies of the privacy statement may also be obtained by writing to us at North Insolvency Ltd, 264 Banbury Road, Oxford, OX2 7DY.</p> <p>This privacy statement was last updated on 1 December 2023.</p>
<b>Complaints</b>	<p>Should you want to complain about our use of personal data, please contact us <a href="mailto:hayley@northinsolvency.co.uk">hayley@northinsolvency.co.uk</a></p> <p>You also have the right to lodge a complaint with the Information Commissioner's Office ("ICO") (the UK data protection regulator). For further information on your rights and how to complain to the ICO, please refer to the ICO website.</p>
<b>Who provided the personal data</b>	<p>The personal data we have used to contact you was provided by the company/individual (or persons acting on their behalf) on whose instructions we are acting or in relation to which our insolvency practitioner has been appointed. We also access information from the Registrar of Companies and other similar public-access data providers.</p>