

PRIVACY NOTICE

Data Subject Access Requests

On-Line Partnership Group Limited understands its obligations regarding your fundamental right to a private life and has implemented systems and controls to ensure your rights and freedoms are protected.

On-Line Partnership Group Limited undertakes to meet its obligations under the Data Protection Act, the Privacy and Electronic Communications Regulations and the UK General Data Protection Regulation (GDPR).

On-Line Partnership Group Limited will support customer understanding by ensuring any communication meets the information needs of customers and any person with a vulnerability is not disadvantaged with the use of format, layout, fonts and language used. Text should be easy to read and without jargon.

<p>WHAT PERSONAL DATA DO WE COLLECT?</p>	<p>On-Line Partnership Group Limited on behalf of its subsidiary companies The On-Line Partnership Limited and The Whitechurch Network Limited will collect the following data specific for the purpose of carrying out a Data Subject Access Request (DSAR):</p> <p>Your name, address, contact telephone numbers and email address.</p> <p>A current photo driving license or passport, together with one form of identification from the list below (dated within the last three months):</p> <ul style="list-style-type: none"> • Instrument of a court appointment (such as liquidator or grant of probate) • Current council tax demand letter of statement • Current bank statements, or credit/debit card statement, issued by a regulated financial sector firm in the UK, EU, or comparable jurisdiction (but not ones printed off the internet) or • Utility bills (but not ones printed off the internet or mobile telephone bills).
<p>HOW WE COLLECT YOUR PERSONAL DATA</p>	<p>You directly provide On-Line Partnership Group Limited with the personal data we collect by the following methods:</p> <p>Original physical copy, scanned certified email copy, scanned certified postal copy.</p>
<p>WHO WILL PROCESS YOUR PERSONAL INFORMATION?</p>	<p>Your personal information will be processed by On-Line Partnership Group Limited on behalf of its subsidiary companies The On-Line Partnership Limited and The Whitechurch Network Limited who act as the Principal for regulatory purposes. All parties will process your personal data in accordance with this privacy notice.</p>



WHY IS YOUR PERSONAL INFORMATION REQUIRED?	Your personal information is required to satisfy the legal requirement to verify a person's identity and subsequent processing of the DSAR.
WHAT HAPPENS IF WE WANT TO PROCESS YOUR INFORMATION FOR OTHER REASONS?	Though there are some legal exceptions, if we wish to process your personal data for any other unrelated purpose than those we have informed you about we will notify you.
WHAT ARE THE CONSEQUENCES IF YOU DO NOT PROVIDE YOUR PERSONAL INFORMATION?	Your personal data is essential to enable us to take steps at your request prior to performing a DSAR to satisfy the legal requirement of identity verification. Without this information we will not be able to proceed.
WHAT MAKES THE PROCESSING LAWFUL?	Because the processing is necessary: <ul style="list-style-type: none">• Consent. You can remove consent at any time by contacting our Data Protection Representative (details below)• For compliance with a legal obligation to which we are subject• For the purposes of the legitimate interests pursued by us.
KEEPING YOUR INFORMATION UP TO DATE	We will record your information exactly as you provide it. You may ask us to update it at any time and we will action your request promptly and where possible notify relevant third parties of any changes.
WHAT ABOUT SENSITIVE PERSONAL DATA?	Unless we are processing because it is necessary for reasons of substantial public interest, we will only process sensitive personal data, such as data concerning health, with your explicit and informed consent for specific processing activities. In such cases you will be asked to sign a separate consent form to evidence this and that you understand the purpose(s) of the processing of such data. Your consent may be withdrawn at any time.
HOW WILL WE FURTHER USE YOUR PERSONAL INFORMATION (OUR LEGITIMATE INTERESTS)?	<ul style="list-style-type: none">• To contact you to ensure that our records of your personal information are correct.• To respond to questions or complaints you have about our services• To update you with changes in our terms• For statistical or research analysis relating to the performance of your business or that of the network and understanding the changing needs of clients• To review, improve and develop services we offer or handle complaints• To pursue debts or unpaid fees



	<ul style="list-style-type: none">• To evidence company practices, for example to fulfil our legal requirement to provide independent audit undertakings.• To evidence the standards and processes carried out conform to the company's ethical standards and expectations• For direct marketing activities• To protect the business from risks which might be introduced by an individual. <p>You have the right to object to processing for these purposes and we shall cease unless we can show we have compelling legitimate grounds to continue.</p>
<p>PROCESSING WHEN PERFORMING A TASK CARRIED OUT IN THE PUBLIC INTEREST</p>	<p>We will use the information provided to protect members of the public against dishonesty, money laundering or fraudulent activities. This must necessarily be carried out without your explicit consent to ensure this function is not prejudiced. Part of this processing involves verifying your identity.</p>
<p>WHAT INFORMATION IS REQUIRED?</p>	<p>We only collect information that is necessary to carry out the purposes listed above. This includes information you supply and data we receive from appointed agencies. Where practical and lawful we will inform you about any personal data we receive about you from third parties that you may be unaware of.</p>
<p>HOW SECURE WILL YOUR DATA BE?</p>	<p>We will ensure that your data is only accessible to authorised people in our firm and will always remain confidential. Appropriate security measures will be in place to prevent unauthorised access, alteration, disclosure, loss, damage, or destruction of your information. If we have a contract with another organisation to provide us with services or a service on our behalf to process your personal information, we will make sure they give reassurances regarding appropriate security measures in place and only process your information in the way we have authorised them to. These organisations will not be entitled to use your personal information for their own purposes. If necessary, our security teams will check them to make sure they meet the security requirements we have set. Please contact our Data Protection Representative below if you would like further information.</p>
<p>WILL WE SHARE YOUR INFORMATION WITH ANYONE ELSE?</p>	<p>We may share your information with:</p> <ul style="list-style-type: none">• Appropriate staff such as those who carry out compliance functions.• Organisations that need your information because we are required to provide it by law (e.g., The FCA, ombudsman services, HMRC, ICO etc).



	<ul style="list-style-type: none">• Law enforcement agencies, courts, or other public authorities if we must, or are authorised to by law.• Where we go through a business transaction, such as a merger, being acquired by another company or selling a portion of its assets, your information will, in most instances, be part of the assets transferred.
TRANSFERRING DATA OUTSIDE THE EUROPEAN UNION	<p>We do not usually transfer any of your personal data outside of the EU except when we need to perform pre-contractual measures (credit and identity checks) or because the checks we request are necessary for important reasons of public interest. Some companies, like Creditsafe Business Solutions Ltd, may transfer data outside of the EU to countries which do not, in the view of the EU Commission, offer an adequate level of protection. In such cases Creditsafe encrypts any data it sends to other agencies and only transfers information necessary to carry out checks.</p> <p><i>(A list of countries used to perform checks include Germany, Netherland, Belgium, France, Sweden, Norway, Finland, Luxembourg, Switzerland, Liechtenstein, Spain, USA, Estonia, Latvia, Lithuania, Poland, Slovakia, Czech Republic, Hungary, Slovenia, Bosnia, Serbia, Montenegro, Croatia, Macedonia, Kosovo, Albania, Bulgaria, Romania, Ukraine, Austria, Denmark, Moldova, Portugal, Italy, Canada, Brazil, Greenland, China, India, Australia, Russia, South Korea, Taiwan, Mexico, South Africa, New Zealand, Hong Kong, UK.)</i></p> <p>Furthermore, we will occasionally use third parties for the processing of personal data in third countries. However, we shall put in place appropriate safeguards to ensure your data is safe before such transfers.</p>
TELEPHONE CALL RECORDING	<p>In line with The Telecommunications (Lawful Business Practice) (Interception of Communications) Regulations 2000 we may record incoming or outgoing telephone conversations for the following purposes:</p> <ul style="list-style-type: none">• Establishing facts and evidence for business transactions• Ensuring compliance with regulatory or self-regulatory practices• Ascertaining and demonstrating that standards are being met• Preventing or detecting crime• Investigating or detecting the unauthorised use of that or any other telecommunication system• Safeguarding the effective operation of the telecommunications system.
HOW LONG WILL WE KEEP YOUR INFORMATION FOR?	<p>The Financial Conduct Authority lays down rules relating to how long information should be held for and we will keep your information to meet these requirements. We will not keep your information for longer than is necessary.</p>



REQUESTING A COPY OF THE INFORMATION WE HOLD	<p>You may at any time ask for a copy of the information we hold about you – it is your legal right. We will provide you with a copy of any non-exempt personal information within one month unless we ask you for an extension of time. To protect your personal data, we will ask you to verify your identity before we release any information. We may refuse your request if we are unable to confirm your identity. Information will be provided to you in a concise, transparent, intelligible, and easily accessible form, using clear and plain language, in particular for any information addressed specifically to a child.</p>
IMPORTANT RIGHTS	<p>You have the right, on grounds relating to your situation, at any time to object to processing which is carried out as part of our legitimate interests or in the performance of a task carried out in the public interest. We will no longer process your data unless we can demonstrate there are compelling legitimate grounds which override your rights and freedoms or unless processing is necessary for the establishment, exercise, or defence of legal claims.</p> <p>You have the right to object at any time to processing your personal data for marketing activities. In such a case we must stop processing for this purpose.</p>
WHAT ARE YOUR OTHER LEGAL RIGHTS?	<p>In addition to the rights above the additional following rights:</p> <ul style="list-style-type: none">• Where you have given consent, you have the right to withdraw previous consent to processing your personal data at any time• You have the right to request from us access to and rectification or erasure of personal data or restriction of processing concerning your data• You have the right to receive data you have provided to us in a structured, commonly used, and machine-readable format and in a concise, transparent, intelligible, and easily accessible form, using clear and plain language• You have the right to object• You have the right to lodge a complaint with the regulator (see below) <p>To exercise any of these rights please contact our Data Protection Representative.</p>
HOW TO CONTACT OUR DATA PROTECTION REPRESENTATIVE	<p>You can contact our Data Protection Representative about any data protection or marketing issues by:</p> <ul style="list-style-type: none">• Writing to: The Data Protection Representative, On-Line Partnership Group Limited, On-Line House, 50-56 North Street, Horsham, West Sussex, RH12 1RD



IN PARTNERSHIP

Working Together

	<ul style="list-style-type: none">• Telephoning: 01403 214200• Emailing: dpo@inpartnership.net
HOW DO YOU MAKE A COMPLAINT TO THE REGULATOR?	<ul style="list-style-type: none">• By writing to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF• By telephoning: 0303 123 1113• By emailing: casework@ico.org.uk• By using their website: https://ico.org.uk/for-organisations/report-a-breach/