



## Sopra Steria Financial Services Limited Privacy Notice

Sopra Steria Financial Services Limited are a credit control, recoveries management and business process outsourcing company.

Sopra Steria Financial Services undertakes collection management of accounts on behalf of our clients / your creditor. The client who has passed your account details to us will have informed you that they utilise our services separately. Your account data is assigned to Sopra Steria Financial Services Limited, however, our client / your creditor remain the controllers of your data. Sopra Steria Financial Services are acting as a data processor.

This Privacy Notice aims to give you information on how Sopra Steria Financial Services Limited collects and processes your personal data, including any data you may provide to our third-party clients through various services or websites we develop for them.

This Privacy Notice should be considered alongside any other Privacy Notices, Informed Consent Notices, or Fair Processing Statements which we may provide relating to particular activities and is not intended to override them.

### Who We Are

This Privacy Notice is issued by Sopra Steria Financial Services Limited so when we mention "Company," "we", "us", "our" or "Sopra Steria" in this privacy notice, we are referring to Sopra Steria Financial Services Limited.

Sopra Steria Financial Services Limited is a private limited company registered in England and Wales with company number 13181306 and is authorised and regulated by the Financial Conduct Authority. Where we are responsible for your personal data Sopra Steria are registered as a data with the Information Commissioner's Office (registration number ZB073728).

### Data Protection Officer

We have appointed a Data Protection Officer (DPO) who is responsible for overseeing questions in relation to this Privacy Notice. If you have any questions, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

If you have any queries regarding this policy, please contact us at; Data Protection Officer, Sopra Steria Limited, Three Cherry Trees Lane, Hemel Hempstead, HP2 7AH. Their email address is [dpo.uk@soprasteria.com](mailto:dpo.uk@soprasteria.com).

If you are not happy with how we have processed your data in the first instance you should contact the DPO. If you're not happy with how we have dealt with your complaint you have the right to complain to the Information Commissioners Officer who are the UK Supervisory Authority. Details are at <https://ico.org.uk/>

### Third Party Links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy notice. When you leave our website, we encourage you to read the privacy notice of every website you visit.

For the Privacy Notice of the Data Controller please refer to the Privacy Notice shared in correspondence relating to your debt.

### Our Commitment to your privacy

Sopra Steria respects your privacy and is committed to protecting your personal data. As such, this Privacy Notice will tell you about how we collect and look after your personal data, whilst informing you of your Data Protection rights and how the law protects you.

We provide this information in a layered format so you can click through to the specific areas set out below. Alternatively, you can download a full [pdf version](#). Please see the 'Definitions' section to further understand some of the terms used in this Privacy Notice.

Every time you wish to use our services or websites we develop for our clients, please check this Notice to ensure you understand the terms that apply at that time. Any changes since the publication date will be listed in section 12 of the Notice.



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### 1. Purpose

The purpose of this Privacy Notice is to notify and be transparent with you about when and how your personal data is used by us, to outline your rights, and to comply with data protection law, including the Data Protection Act 2018 (DPA 2018) and UK General Data Protection Regulation (UK GDPR), and the Privacy in Electronic Communications Regulations 2003 (PECR).

We are the "data processor" in terms of your personal data, and only process your personal data on documented instructions we receive from our clients, who are the "data controllers" and are responsible for actions related to how we hold and use personal information about you.

### 2. Data protection principles

As a data processor, we actively comply with the data protection principles set out in data protection law, including the DPA 2018, and the UK GDPR. Together, these say that personal information we hold about you must be:

- used lawfully, fairly and in a transparent way;
- collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
- relevant to the purposes we have told you about and limited only to those purposes;
- accurate and kept up to date;
- kept only as long as necessary for the purposes we have told you about;
- kept securely and where shared with third parties, inform you, particularly if this is outside of the UK.

### 3. The types of information we hold about you

Personal data, or personal information, means any information about an individual from which a living person can be identified, directly or indirectly. It does not include data where your identity has been removed (anonymous data).

As a site user, we may collect, use, store and transfer various kinds of personal data about you which we have listed together as follows:

- **Identity Data** including first name, last name, title.
- **Contact Data** including physical address, email address and telephone numbers, location/country.
- **Financial data** including transaction data, account information, debt management data, or payment card information.
- **Publicly Available Data** including Information from sources such as: Insolvency Register, Electoral Register, Internet
- **Call Recordings** We record any telephone calls you make to us or we make to you or any other third party. This is for training, monitoring and quality purposes and to meet our legal and regulatory obligations. Some telephone calls may be observed by staff for training and development purposes.
- **Technical Data** including internet protocol (IP) address, login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Usage Data** including information about how you use our websites.
- **Client Data** where we perform a service on behalf of our clients.



- **Health data vulnerability data** including information about your health, mental health, emotional wellbeing, disability information, and vulnerability information.

We may also use your personal data to generate Aggregated Data. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. Aggregated Data, being anonymised, is not considered personal data under the law.

There are "Special Categories" of more sensitive personal data which require a higher level of protection, such as details about your race or ethnicity, religious or philosophical beliefs, sexual orientation, financial wellbeing, together with information about your health and vulnerabilities. In rare cases, data relating to children and criminal offence information may be processed as part of the services we offer.

### 3.1 Maintaining data accuracy

It is important to us that the information we hold about you is accurate and current. Please keep us informed of any changes at [info.uk@soprasteria.com](mailto:info.uk@soprasteria.com).

## 4. How your personal information is collected

We use different methods to collect data from and about you including through:

- **Direct interactions:** You may give us your identity, contact, financial, health, vulnerability and other data by filling in forms or use of our website or portal, or by corresponding with us by post, phone, email or otherwise.
- **Third party sources:** We may receive personal data about you from various third-party sources set out below,
  - Identity, contact details, financial information, health, and vulnerability information from our clients for whom we provide a service, or other third parties in the provision of those services.
- **Automated technologies or interactions:** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns, which might be used with other identifying data to establish other personal information about you. We collect this data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our Cookie Policy for further details.

## 5. How we may use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where it is necessary in the performance of a contract, between us and our clients or suppliers;
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override our legitimate interests (or those of the relevant third party), such as to communicate with you about the services you use;
- Where we need to comply with a legal or regulatory obligation.
- Vital Interests - There can be rare occasions where it becomes necessary to use your personal information to protect your vital interests (or someone else's vital interests).

## 6. Purposes for which we may use your personal data

We have set out below, in a table format, a description of all the ways we may use your personal data, and the lawful bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Generally, we do not rely on consent as a lawful basis for processing your personal data. Where we do use consent, you have the right to withdraw consent to marketing any time by contacting us at [info.uk@soprasteria.com](mailto:info.uk@soprasteria.com), or by **unsubscribing within any email communication we may send to you (found at the footer of each email)**.

Note that we may process your personal data for more than one lawful basis depending on the specific purpose(s) for which we are using your data.

Purpose/Activity	Lawful basis
To deliver services to our clients	(a) In the performance of a contract



Purpose/Activity	Lawful basis
<p>To manage our relationship with you and provide the correct help and advice including:</p> <p>(a) Notifying you about changes to our terms</p> <p>(b) Asking you to provide feedback</p> <p>(c) Collecting health and vulnerability data</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) In the performance of a contract with our client</p> <p>(d) The data subject has given consent to the processing of his or her personal data</p>
To administer and protect our business and websites (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>(b) Necessary to comply with a legal obligation</p>
To use data analytics to improve our website and related services	Necessary for our legitimate interests (to define types of customers for services, to keep our website updated and to develop our business)
To meet our legal obligations and defend our interests in the event of a dispute.	We may be subject to legal and regulatory obligations to disclose data and may also have a legitimate interest in using the data to defend ourselves in the event of legal action

## 6.1 Marketing

Where we do not currently have your consent to send you marketing communications:

- you are an existing customer (or have negotiated to buy a product or service from us), we use soft opt-in under PECR rules to deliver content to you. This means we do not ask for you to 'opt-in' via a checkbox, and instead provide you with the ability to 'opt out' at any time, for example at the footer of each email we send to you;
- you are not an existing customer or prospective candidate, we use either your explicit consent (via an opt-in checkbox), or another positive action, such as completing a registration form.

If you would like to know about your marketing preferences, please contact [info.uk@soprasteria.com](mailto:info.uk@soprasteria.com). We retain your data for 18 months after your last digital interaction with our organisation after which your records will be removed from our marketing database. Where you opt out of our communication, we will retain this instruction for a period of 18 months after which your data will be deleted.

We may use your identity, contact, technical, usage and profile data to form a view on what we think may be of interest to your organisation.

We do not actively market directly to customers of our clients.

## 6.2 Cookies

When you visit our websites or portals, they may leave a packet of information about your visit on your computer, and in return your computer may leave its IP address on the websites you visit - these are called cookies. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. You can find more information [here](#). For more information about the cookies we use, please see our Cookie Policy. You can opt out of cookies on this site at any time via our integrated "Cookie Management" link available in the footer on all pages and as a banner when you access our sites.

If you refuse the cookies, they will not be installed unless they are strictly necessary (a cookie to save your refusal).

If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.



### 6.3 Change of purpose

We will only use your personal data for the purposes for which we collected it.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the lawful basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with this notice, where this is required or permitted by law.

### 6.4 Automated decision-making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making unless we have a lawful basis for doing so and we have notified you.

### 6.5 Recording Calls

We record some of the telephone calls you make to us, or we make to you or any other third party. This is for training, monitoring and quality purposes and to meet our legal and regulatory obligations. Some telephone calls may be observed by staff for training and development purposes.

We may keep a copy of the telephone calls for up to 3 years from the date the telephone call was made.

## 7. Data sharing

We may in some circumstances have to share your data with third parties, including third-party service providers and other Sopra Steria Group entities. We require third parties to respect the security of your data and to treat it in accordance with the law.

We may in some circumstances transfer your personal information outside the UK or EU. Where this is required, we will ensure your rights are adequately protected through:

- Findings of adequacy (countries deemed by the European Commission and the ICO to have adequate protections for personal data);
- Standard Contractual Clauses (EU Model Clauses with UK the International Data Transfer Addendum)
- Or any other protection deemed adequate by the ICO.

### 7.1 Why might we share your personal data with third parties?

When required, we will share your personal information with third parties. This may, in some circumstances, involve sharing special categories of personal data or, where relevant, data relating to criminal allegations.

We may also share your personal information with:

- **Suppliers and Clients** involved in providing services as part of their contract with you or for the purpose of communications or events;
- **Professional advisers** including lawyers, bankers, auditors, and insurers who provide consultancy, banking, legal, insurance and accounting services;
- **Government Authorities** like HM Revenue & Customs, regulators and other authorities who require reporting of processing activities in certain circumstances;
- **Third parties** to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy Notice.

### 7.2 Which third-party service providers process your personal information?

Some of our group systems are hosted by third parties who also process the data for the purposes set out in this Privacy Notice. This includes Oracle, and our site hosting provider. Our site also contains cookies set by third parties, as set out in our [Cookie Policy](#).

### 7.3 How secure is your information with third-party service providers?

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We only permit them to process your personal data for specified purposes and in accordance with our instructions.



#### 7.4 When might we share your personal data with other organisations within the Sopra Steria Group?

All Sopra Steria Financial Services Limited hosted websites are hosted in the UK or EU. Your personal information may be transmitted to, stored, and processed in EU. We may share your personal information with other companies in the UK group or with wider Sopra Steria Group organisations for the purposes set out in 'Purposes for which we will use your personal data' above.

#### 7.5 Transferring personal data outside of the UK or EU/European Economic Area (EEA)

We do not transfer or process personal data outside of the UK or the EU/European Economic Area (EEA)

### 8. Data security

We have put in place measures to protect the security of your information.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

### 9. Data retention

#### How long will we keep your information for?

We will retain your personal information in line with our clients Data Retention Schedule or for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

### 10. Legal rights

#### Your rights in connection with personal information processed by a Sopra Steria Client or ourselves

We act as a Data Processor and our client is the Data Controller. It is advised that you approach the Data Controller in the first instance to exercise your legal rights;

You have the following legal rights in connection with your personal information. You are legally entitled to:

- **Request access to your personal data.** This enables you to receive a copy of the personal data we or our client hold about you as well as information on how your Personal Data will be processed and the lawful basis for this processing.
- **Request correction of the personal data that we hold about you.** You can request to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request deletion of your personal data.** You can ask us to delete or remove personal data where there is no other reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing. Please note, however, that the right to erasure is not absolute. We may not always be able to comply fully with your request of erasure due to specific legal obligations which will be notified to you at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party), or automated decision making, and you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the absolute right to object where we are processing your personal data for direct marketing purposes. In some cases (with the exception of direct marketing), we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
  - (a) if you want us to establish the data's accuracy;
  - (b) where our use of the data is unlawful, but you do not want us to erase it;
  - (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims;
  - (d) you have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.
- **Ask not to be subject to automated processing or profiling** in relation to your personal data. Typically, this means decision-making by automated means, including Artificial Intelligence in order to make business decisions. Here, you have the right to ask for a living person to be involved in decision-making, called 'person-in-loop.' You also have the right to ask us to review any decision made by automated means.
- **Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing conducted before you withdraw your consent. If you withdraw your consent, we may not be



able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you want to exercise any of these rights, please contact our Data Protection Officer, Sopra Steria Limited, Three Cherry Trees Lane, Hemel Hempstead HP2 7AH in writing, or email [dpo.uk@soprasteria.com](mailto:dpo.uk@soprasteria.com).

Please note that exemptions set out in the Data Protection Act 2018 may apply, meaning that we do not have to grant your request in full. However, we will always meet your request as far as we are able.

### No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we are allowed under the law to charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we can refuse to comply with the request in such circumstances.

### What we may need from you

We sometimes need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it. If you do not provide such information in a timely manner, this may delay or deny your request.

## 11. Data Protection Officer

We have appointed a Data Protection Officer (DPO) to oversee compliance with this Privacy Notice. If you have any questions about this Privacy Notice or how we handle your personal information, please contact the DPO at Data Protection Officer, Sopra Steria Financial Services Limited, Three Cherry Trees Lane, Hemel Hempstead HP2 7AH or [dpo.uk@soprasteria.com](mailto:dpo.uk@soprasteria.com).

## 12. Changes to this Privacy Notice

We reserve the right to update this Privacy Notice at any time. We will notify you from time to time about the processing of your personal information within our communications. Any material changes to the privacy are listed below.

- Initial document created February 2024.
- Slight grammatical amendments January 2025

## 13. Definitions

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation to which we are subject.

**In the performance of a contract** is where we process personal information upon instructions contained within a contract (i.e., to provide a contractual service), between ourselves and third parties (typically our clients or our suppliers).

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us..

**If you have any questions about this privacy notice, please contact Data Protection Officer, Sopra Steria Limited, Three Cherry Trees Lane, Hemel Hempstead HP2 7AH or [dpo.uk@soprasteria.com](mailto:dpo.uk@soprasteria.com).**

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**Policy Authorised by:** Ruth Walkden, Legal Director (UK Data Protection Officer)

**Policy Issued by:** This document is issued by **Ruth Walkden**, who is the owner and to whom any change requests or queries should be directed.

**Policy Document Control:**

Version	Date	Policy Review Details	Reviewed by
0.1	February 2024	Initial document	Ann Ashley
0.2	January 2025	Updated DPN	Scott Brown

