

Privacy Notice

Walker Love is the trading name of George Walker & Co, a partnership having its principal place of business at 16 Royal Exchange Square Glasgow G1 3AB (D-U-N-S number 42-366-8698). A list of all Partners can be obtained in writing from our principal place of business. We are fully aware of the importance of managing your personal data, in accordance with current data protection legislation and industry standards. We are registered with the Information Commissioner's Office (Reference Number: Z5326407).

Please refer to the following Q&A which explains when, why and how we and companies in our group collect personal information about individuals and how this information is used, the conditions under which it may be disclosed to others and how it is kept secure.

Whenever dealing with our group companies, the relevant company that corresponds with details in Schedule 1 is the data controller in relation to the processing activities described below. A "data controller" is an organisation that decides why and how your personal information is processed. Where this policy refers to "we", "our" or "us" below, unless it mentions otherwise, it's referring to the particular company that is the controller of your personal information.

We may use your personal information when we are performing contractual services for clients. Depending on the service provided, we will act as a data processor or data controller.

Typically, where we are providing debt collection services or preparing legal documents, only using data provided by our client, then we are acting as a data processor and in such circumstances, our client is legally responsible for explaining how your personal data will be used, within the scope of their Privacy Notice, which will typically be available on their website. Failing which, we recommend that you contact them directly.

Where we are providing debt collection or enforcement services, which require that we obtain additional data, or use your data to determine the most appropriate litigation or enforcement strategy, then in such circumstances we will be acting as a data controller and this Privacy Notice will be applicable.

How do we collect your personal information?

When you use our website, to access our services, the categories of information that we may collect about you are as follows:

Personal information you give to us.

This is information about you that you provide to us by entering information via:

- our site (www.walkerlove.com);
- social media platforms;
- corresponding with us by phone, email, SMS or otherwise,

This includes information provided at the time of registering to use our site, subscribing to the services we provide through our site, posting material or requesting further services, managing your account online (including accessing documentation and engaging in correspondence with us by phone, email or otherwise). We may also ask you for information when you report a problem with our site. If you complete any surveys that we request you complete for research purposes, we will collect information in such circumstances as well. The information you give us includes your name, address, email address and phone number, enquiry details and may include records of any correspondence and responses to any surveys.

Personal information we collect about you:

We may automatically collect the following information: details of transactions you carry out through the site, and your visits to our site, including, but not limited to, traffic data, location data, weblogs and other communication data, and the resources you access. We may also automatically collect technical information, including anonymous data collected by the hosting server for statistical purposes, the Internet protocol (IP) address used to connect your computer or device to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform. Please see the Cookies section within our

website. We may also collect any personal information which you allow to be shared that is part of your public profile or third-party social network, type and version, time zone setting, browser plug-in types and versions, operating system and platform. We may also collect any personal information which you give to us directly on email, SMS, in correspondence or over the telephone about your personal circumstances and your financial history and situation.

Personal information we may receive from other sources:

We obtain certain personal information about you from sources outside of our business which may include our group companies or other third-party companies. We offer some of our services on or through other websites and the personal information that you provide to those sites may be sent to us in order to deliver the service. The third parties that may send us personal information about you are as follows:

Source of personal information	Privacy policy	The categories of personal information we obtain from these sources
<p>Walker Love group of companies:</p> <p>Walker Love Messengers-at-Arms & Sheriff Officers</p> <p>Walker Love Revenue Collections</p> <p>Walker Love Collections</p> <p>Walker Love Investigations</p> <p>W L Payment Distributors</p> <p>WL Recoveries Limited trading under the following brand – Walker Love Recoveries</p>	<p>This policy</p>	<p>Names dates of birth personal and business contact details and home addresses. Information relating to financial status including account balances, payment history, employment, potential avenues for enforcement, details of orders granted/sought info relating to individuals’ activities, Criminal offenses data, health and medical information.</p>
<p>Credit agencies</p>	<p>Third party privacy policy</p>	<p>Financial history, bank details, employer’s details, residential status and history, credit history, employment history, judgments, date of birth.</p>
<p>Creditors / Clients</p>	<p>Third party privacy policy</p>	<p>Names, dates of birth, personal and business contact details, and home addresses. Info relating to financial status including account balances, payment history, employment, potential avenues for enforcement, details of orders granted/sought info relating to individuals’ activities, criminal offences, data health and medical information.</p>
<p>Landlords, property agents, neighbours and cohabittees</p>	<p>Third party privacy policy, where applicable</p>	<p>Residential details, current former occupiers, previous and forwarding addresses. Residential and or employment/business contact details, including postal, email addresses and or telephone numbers.</p>

Public court records	Third party privacy policy	Judgements and insolvency details.
Employers	Third party privacy policy	Salary details, NI, employment details, previous and forwarding addresses. Residential and or employment/business contact details, including postal, email addresses and or telephone numbers.
Local Authorities	Third party privacy policy	Residential details, current former occupiers, previous and forwarding addresses. Residential and or employment/business contact details, including postal, email addresses and or telephone numbers.
Government Departments	Third party privacy policy	Residential details, current former occupiers, previous and forwarding addresses. Residential and or employment/business contact details, including postal, email addresses and or telephone numbers. Judgements and insolvency details. Property ownership, Registered Keeper Information of Vehicles, Electoral information. Details of births, deaths, marriages, civil partnerships and divorces.
Scottish Prison Service	Third party privacy policy	Prison number, location, liberation address.

The reasons for holding your data are to ensure that we can effect the service of legal documents, enforce court orders, collect sums due, trace or contact and communicate with you, as quickly and conveniently as possible. Typically, this may include written correspondence, a visit to your home or business, telephone contact, SMS or consented email.

How do we use your personal information?

The purposes for which we use your information and the legal basis under data protection laws on which we rely to do this are explained below.

Legal Obligation: We will use your personal information to comply with our legal obligations: (i) to assist the court or other public authority or criminal investigation body; (ii) to identify you when you contact us; and/or (iii) to verify the accuracy of data we hold about you; and (iv) to comply with Messengers at Arms and Sheriff Officers Rules.

Public Task: We will use your personal information where necessary in the exercise of official authority or to perform specific tasks in the public interest by virtue of our public office and statutory role in the administration of justice.

Consent: We may use and process your personal information where you have consented for us to do so for the following purposes:

- Marketing; by, post, email or text concerning details of our services
- Where you have volunteered certain special category data, such as health information, to help us better understand your personal or financial circumstances, we will seek your explicit consent to process this information.

You may withdraw your consent for us to use your information in any of these ways at any time. Please see [Withdrawing your consent](#) for further details.

Contractual Obligation: We may use and process your personal information where we have supplied you (or continue to supply you) with any services, where we have arranged for the supply of another company's products or services to you, or where you are in discussions with us about any new product or service. We will use this information in connection with the contract for the supply of products or service, when it is

needed to carry out that contract with you or for you to enter into it. Please see the type of personal information we process about you above, and for details of the types of personal information we process for these purposes.

Legitimate Interest: We may use and process your personal information where it is necessary for us to pursue our legitimate interests as a business, or that of a third party, for the following purposes:

- to undertake relevant and proportionate enquires to assess your personal and financial circumstances, including establishing your current location and or employment status and location
- for analysis to inform our marketing strategy, and to enhance and personalise your customer experience (including to improve the recommendations we make to you on our website)
- to correspond or communicate with you
- to verify the accuracy of data that we hold about you and create a better understanding of you
- for network and information security in order for us to take steps to protect your information against loss or damage, theft or unauthorised access
- for prevention of fraud and other criminal activities
- to comply with a request from you in connection with the exercise of your rights (for example where you have asked us not to contact you for marketing purposes, we will keep a record of this on our suppression lists in order to be able to comply with your request)
- to assess and improve our service through recordings of any calls with our contact centre
- for the management of queries, complaints, or claims
- for the establishment and defence of our legal rights

In respect of our marketing activities (other than where we rely on your consent to contact you by e-mail or text with information about our products and services or share your details with third parties to do the same, as explained above)

Vital interests: Where we reasonably believe that the processing of your personal information will prevent or reduce any potential harm to you. It is in your vital interests for us to use your personal information in this way.

Data anonymisation and use of aggregated information: Your information may be converted into statistical or aggregated data in such a way as to ensure that you are not identified or identifiable from it. Aggregated data cannot be linked back to you as a natural person. We may use this data for analytical and research purposes.

Where the personal information will be shared and with whom?

Group Companies

We may share your information with other companies or departments within our organisation. They may use your personal information in the ways set out in **How do we use your personal information?**

Please see the start of this policy for the details of our group companies with whom we may share your personal information.

Our clients

In accordance with normal business practice, be it in relation to debt collection, investigation or Sheriff Officer activities, we will provide our clients with relevant and proportionate information, which has been discovered or provided within the scope of the service provided.

Our suppliers and service providers

We may disclose your information to our third-party service providers, agents, subcontractors and other organisations for the purposes of providing services to us or directly to you on our behalf. Such third parties may include cloud service providers (such as hosting, telephony services and email management), the court, lawyers, debt advice and debt management agencies, process servers, mail houses, printing services, credit reference agencies, banks, potential employers and administrative services.

When we use third party service providers, we only disclose to them any personal information that is necessary for them to provide their service and we have a contract in place that requires them to keep your information secure and not to use it other than in accordance with our specific instructions.

Credit/debit card payment processors

When you make a payment, your credit/debit card 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 using the details at the end of this policy.

Other ways we may share your personal information

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. We may also transfer your personal information if we're under a duty to disclose or share it in order to comply with any legal obligation, to detect or report a crime, to enforce or apply the terms of our contracts or to protect the rights, property or safety of our visitors and customers. We will always take steps with the aim of ensuring that your privacy rights continue to be protected.

Where do we store your personal information?

All information you provide to us is stored on our secure servers which are located within the UK and European Economic Area (EEA).

If at any time we transfer your personal information to, or store it in, countries located outside of the EEA (for example, if our hosting services provider changes) we will ensure that appropriate safeguards are in place for that transfer and storage as required by applicable law. This is because some countries outside of the UK and EEA do not have adequate data protection laws equivalent to those in the EEA.

If you use our services whilst you are outside the UK or EEA, or you require us to do so your information may be transferred outside the EEA in order to provide you with those services

How long your personal information will be kept?

If we collect your personal information, the length of time we retain it is determined by a number of factors including the purpose for which we use that information and our obligations under other laws. We do not retain personal information in an identifiable format for longer than is necessary.

We may need your personal information in case of queries from you, to establish, bring or defend legal claims or in accordance with legal and regulatory requirements. For this purpose, we may retain your personal information for up to 7 years, after the date it is no longer needed by us for any of the purposes listed under How do we use your personal information? above. The only exceptions to this are where:

- the law requires us to hold your personal information for a longer period, or delete it sooner;
- you exercise your right to have the information erased (where it applies) and we do not need to hold it in connection with any of the reasons permitted or required under the law (see further Erasing your personal information or restricting its processing below); or
- in limited cases, the law permits us to keep your personal information indefinitely provided we put certain protections in place.

Will the Data be used for profiling or to make any automated decisions?

We may undertake enquiries and profiling activities to establish whether or not it would be appropriate to proceed with litigation or enforcement. To do this, we may use third party credit reference agencies (CRA) to obtain a better understanding of your current financial circumstances. This process will be managed by trained and experienced agents with no reliance on automated decision-making processes.

Security and links to other sites

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your information transmitted to our website and any transmission is at your own risk. Once we have received your personal information, we put in place reasonable and appropriate controls to ensure that it remains secure against accidental or unlawful destruction, loss, alteration, or unauthorised access.

Where we collect any special category information about your ethnic background, health and criminal proceedings, we will apply additional security controls to protect that data.

Where we have given (or where you have chosen) a password which enables you to access an account, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Our website may contain links to other websites run by other organisations. This policy does not apply to those other websites, so we encourage you to read their privacy statements. We cannot be responsible for the privacy policies and practices of other websites even if you access them using links that we provide. In addition, if you link to our website from a third-party website, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party website and recommend that you check the policy of that third party website.

Your Rights

You have a number of rights in relation to your personal data under data protection legislation. To ensure that we are communicating with the correct person, we may ask you for information to verify your identity and enable us to find your personal data.

You are not obliged to provide us with any personal data under any statutory or contractual obligation but it is in your best interests to co-operate in order to reach a mutually agreeable solution and avoid any further costs or fees being incurred by you. Your rights are summarised as follows: -

Accessing your personal data: To obtain a copy of your personal information (this is constituted as a Subject Access Request – SAR), please make contact by email: DPA@walkerlove.com or write to Subject Access Request, Walker Love, 16 Royal Exchange Square Glasgow G1 3AB. There is no charge for obtaining a SAR, however, please note that we prefer that you complete our template form, in order to provide proof of your identity before releasing this information.

Correction of personal information: If you become aware that any of the information which we hold about you is out of date or otherwise inaccurate, then please make contact by email or post at the above address. We undertake to review and correct any such anomaly as quickly as possible.

Withdrawing your consent: Where we rely on your consent as the legal basis for using your personal information, you may withdraw your consent at any time by emailing or writing to us at the above address (Please use “Withdrawal of Consent” as the subject heading of your email or letter).

Objecting to our use of your personal data: Should you disagree with our reason for processing your data, then you can object, by emailing or writing to us at the above address. Except for the purposes for which we are certain that we can continue to process your personal data and where our interests override yours, we will temporarily stop processing your personal data, until we have investigated the matter. If we agree that your objection is justified, then we will stop using your data. Alternatively, we will provide you with our justification as to why we need to continue to process your data.

Marketing: We will only use data for marketing in respect of business development, where we are communicating with an established client or potential new client.

Erasing your personal data or restricting its processing: You may request that your personal data be removed from our systems by emailing or writing to us at the above address. Please note that this right is not an absolute right. Provided we do not have any continuing legitimate reason to continue processing or holding your personal data, we will make reasonable efforts to comply with your request. You may also request that we restrict the processing of your personal data, where you believe our processing is unlawful, you contest its accuracy, you have objected to its use and our investigation is pending.

Data Portability: Given the nature and scope of the services we provide; it is unlikely that data portability rules will apply to the data we process on the grounds of Legitimate Interest. However, we will consider, on an individual basis any such request, to transfer data you have provided to us as a Data Controller. We will cooperate as much as reasonably practicable. Where appropriate, this information will be provided in a commonly used and machine-readable format.

Automated Decision Making: In the course of normal business activities, be it debt collection, investigation or Sheriff Officers services, at no time will we conduct automated decision-making activities which fall within the scope of Article 22 of GDPR.

How to complain about the processing of your personal data

If you would like a copy of this privacy notice, have any questions, concerns, or complaints about the way we have processed your personal data, then please email: DPA@walkerlove.com or write to the Data Protection

Officer, Walker Love, 16 Royal Exchange Square Glasgow G1 3AB. We will endeavour to resolve your query or complaint as quickly and amicably as possible.

If thereafter, you remain unhappy with the way we have handled your complaint or are still concerned about our handling of your personal information, then you have a right to take your complaint to the Information Commissioner's Office at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF and www.ico.org.uk.

This Privacy notice will be reviewed on a regular basis and at least annually to ensure that it remains relevant and compliant with current data protection legislation, industry standards and good business practice. Last update July 2023.

Schedule 1 Group Companies

Group Company	Registered Address	Registration Number
George Walker & Co T/A Walker Love under the following brands Walker Love Messengers-at-Arms & Sheriff Officers Walker Love Revenue Collections Walker Love Collections Walker Love Investigations W L Payment Distributors	A partnership, having its principal place of business at 16 Royal Exchange Square Glasgow G1 3AB	N/A
WL Recoveries Limited trading under the following brand Walker Love Recoveries	16 Royal Exchange Square Glasgow G1 3AB	SC084578