



Privacy Notice

This privacy notice tells you what to expect us to do with your personal information.

- [Contact details](#)
- [What information we collect, use, and why](#)
- [Lawful bases and data protection rights](#)
- [Where we get personal information from](#)
- [How long we keep information](#)
- [Who we share information with](#)
- [How to complain](#)

1. Contact details

Email: DPO@hollymcalpine.com

2. What information we collect, use, and why

We collect or use the following information to **provide and improve products and services for clients**:

- Names and contact details
- Addresses
- Gender
- Pronoun preferences
- Occupation
- Date of birth
- Marital status
- Third party information (such as family members or other relevant parties)
- Payment details (including card or bank information for transfers and direct debits)
- Financial data (including income and expenditure)
- Transaction data (including details about payments to and from you and details of products and services you have purchased)
- Usage data (including information about how you interact with and use our website, products and services)
- Employment details (including salary, sick pay and length of service)
- Credit history and credit reference information
- Health information (such as medical records or health conditions)
- Criminal records data (including driving or other convictions)
- Information relating to compliments or complaints
- Audio recordings (eg calls)
- Records of meetings and decisions
- Account access information
- Website user and device information

We also collect or use the following information to **provide and improve products and services for clients:**

- Racial or ethnic origin
- Religious or philosophical beliefs
- Trade union membership
- Health information
- Sexual orientation information

We collect or use the following personal information for the **operation of client or customer accounts:**

- Names and contact details
- Addresses
- Purchase or service history
- Account information, including registration details

We also collect or use the following information for the **operation of client or customer accounts:**

- Racial or ethnic origin
- Religious or philosophical beliefs
- Trade union membership
- Health information
- Sexual orientation information

We collect or use the following personal information to **comply with legal requirements:**

- Name
- Contact information
- Identification documents
- Client account information
- Any other personal information required to comply with legal obligations
- Criminal offence data

We also collect or use the following information to **comply with legal requirements:**

- Racial or ethnic origin
- Religious or philosophical beliefs
- Trade union membership
- Health information
- Sexual orientation information

We collect or use the following personal information for **dealing with queries, complaints or claims**:

- Names and contact details
- Payment details
- Account information
- Purchase or service history
- Witness statements and contact details
- Relevant information from previous investigations
- Customer or client accounts and records
- Financial transaction information
- Correspondence

3. Lawful bases and data protection rights

Under UK data protection law, we must have a “lawful basis” for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO’s website.

Which lawful basis we rely on may affect your data protection rights which are in brief set out below. You can find out more about your data protection rights and the exemptions which may apply on the ICO’s website:

- **Your right of access** - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. [You can read more about this right here.](#)
- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. [You can read more about this right here.](#)
- **Your right to erasure** - You have the right to ask us to delete your personal information. [You can read more about this right here.](#)
- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information. [You can read more about this right here.](#)
- **Your right to object to processing** - You have the right to object to the processing of your personal data. [You can read more about this right here.](#)
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. [You can read more about this right here.](#)
- **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time. [You can read more about this right here.](#)

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information to **provide and improve products and services for clients** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - Reference and case studies.
 - Marketing and business development.
- Vital interests – collecting or using the information is needed when someone’s physical or mental health or wellbeing is at urgent or serious risk. All of your data protection rights may apply, except the right to object and the right to portability.

Our lawful bases for collecting or using personal information for the **operation of client or customer accounts** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

- Vital interests – collecting or using the information is needed when someone’s physical or mental health or wellbeing is at urgent or serious risk. All of your data protection rights may apply, except the right to object and the right to portability.

Our lawful bases for collecting or using personal information to **comply with legal requirements**:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Our lawful bases for collecting or using personal information for **dealing with queries, complaints or claims** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Vital interests – collecting or using the information is needed when someone’s physical or mental health or wellbeing is at urgent or serious risk. All of your data protection rights may apply, except the right to object and the right to portability.

4. Where we get personal information from

- Directly from you
- Legal bodies or professionals (such as courts or solicitors)
- Debt collection agencies
- Publicly available sources
- Previous employment
- Credit reference agencies
- Suppliers and service providers

5. How long we keep information

For information on how long we keep personal information, see our retention schedule at <https://hollymc Alpine.com/data-retention-schedule/>

6. Who we share information with

- Professional or legal advisors
- Emergency services
- Organisations we're legally obliged to share personal information with
- Previous employers
- Suppliers and service providers
- Professional consultants

7. How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>

8. Document Control

Version	Date	Author	Reason
1.0	1 September 2024	Holly McAlpine	New document