



TREMARK

Data Processing Statement

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COMPLIANCE | COMPETENCE | CONFIDENTIALITY



Data Processing Statement

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1. Introduction

Tremark Associates Limited and Tremark ASP Limited (**Tremark/we/us/our**) processes personal data in connection with its professional investigatory services, process agent services and debt recovery activities.

- 1.1 Tremark are committed to properly protecting and processing the data that it holds. The following is a broad description of the way we process personal information.
- 1.2 This document supplements Tremark's top level Information Security Policy and should be read in conjunction with it and all of the supporting sub-policies and documents listed within it.

2. Responsibility

- 2.1 Responsibility for the production, maintenance and communication of this document lies with the Information Security Manager. It is also the responsibility of the Information Security Manager to ensure that annual reviews of this document take place to ensure that it remains internally consistent and that the document is version controlled.
- 2.2 Any substantive changes made to any of the documents in the set will be communicated to all relevant personnel.

3. Reasons and purposes for processing information

- 3.1 Tremark process personal information to enable us to:

- i. provide investigatory services and to collect commercial debts on the written instructions of a data controller (our client);
- ii. provide services to our clients;
- iii. maintain our own accounts and records;
- iv. support and manage our employees; and/or
- v. act in the best interest of the data subject.

4. Types and classes of information processed

4.1 We process information relating to the above reasons/purposes. This information may include:

- i. personal details;
- ii. the investigation brief, results and related information;
- iii. lifestyle and social circumstances;
- iv. family details;
- v. goods and services;
- vi. financial details; and/or
- vii. education and employment and/or business details.

4.2 We also process sensitive classes of information that may include:

- i. physical or mental health details;
- ii. racial or ethnic origin;
- iii. trade union membership;
- iv. religious or other beliefs; and/or
- v. criminality.

5. Who the Information is processed about

5.1 We process personal information about:

- i. customers and clients, including prospective clients;
- ii. witnesses;

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- iii. the subjects of investigations and debts we are instructed to collect;
- iv. business contacts;
- v. advisers and other professional experts;
- vi. suppliers; and
- vii. employees.

6. Who the information may be shared with

6.1 Tremark sometimes need to share the personal information we process with the individual themselves and also with other organisations. Where this is necessary we are required to comply with all aspects of the Data Protection Act (DPA). What follows is a description of the types of organisations we may need to share some of the personal information we process with for one or more reasons.

6.2 Where necessary or required we share information with:

- i. financial organisations;
- ii. credit reference, debt collection and tracing agencies;
- iii. police forces;
- iv. professional investigators;
- v. government;
- vi. business associates and other professional bodies and advisers;
- vii. suppliers;
- viii. current, past or prospective employers;
- ix. education and examining bodies; and
- x. family, associates or representatives of the person whose personal data we are processing.

7. Legal basis for processing

7.1 Personal The lawful bases for processing are set out in Article 6 of the GDPR. At least one of these must apply whenever you process personal data:

- i. Consent: the individual has given clear consent for you to process their personal data for a specific purpose.

- ii. Contract: the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.
- iii. Legal obligation: the processing is necessary for you to comply with the law (not including contractual obligations).
- iv. Vital interests: the processing is necessary to protect someone's life.
- v. Public task: the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.
- vi. Legitimate interests: the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests. (This cannot apply if you are a public authority processing data to perform your official tasks.)

8. Trading and sharing personal information

- 8.1 Personal information is traded and shared as a primary business function. For this reason, the information processed may include name, contact details, family details, financial details, employment details, and goods and services. This information may be about customers, clients and the subjects of our investigations.
- 8.2 The information may be traded or shared with business associates and professional advisers, agents, service providers, customers and clients.

9. Undertaking investigations and carrying our client's instructions

- 9.1 Personal information is also processed to undertake investigations and to carry out our client instructions.
- 9.2 For this reason, the information processed may include name, contact details, family details, lifestyle and social circumstances, financial details, good and services.
- 9.3 The sensitive types of information may include physical or mental health details, racial or ethnic origin and religious or other beliefs.
- 9.4 Where necessary or required information provided by survey respondents may be shared with customers and clients, agents, service providers, survey and research organisations.

10. Consulting and advisory services

- 10.1 Information is processed for consultancy and advisory services that are offered.



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- 10.2 For this reason, the information processed may include name, contact details, family details, financial details, and the goods and services provided.
- 10.3 This information may be about customers and clients.
- 10.4 Where necessary this information is shared with the data subject themselves, business associates and other professional advisers, current, past or prospective employers and service providers.

11. Duration

- 11.1 Tremark requires that different types of records be retained for specific periods of time to comply with UK legislation and good practice. Tremark ensures consistent treatment and security of records. Maintenance, retention, and disposal procedures for the firm's records must be followed systematically by all staff. Full information can be found in our Records Retention and Data Destruction Policy.

12. Transfers

- 12.1 It may sometimes be necessary to transfer personal information overseas.
- 12.2 When this is needed information may be transferred to countries or territories around the world.
- 12.3 Any transfers made will be in full compliance with all aspects of the Data Protection Act.

13. Information about Tremark

- 13.1 Tremark includes Tremark Associates Limited and Tremark ASP Limited, both of whom are limited companies registered in England and Wales. Further information is provided below.
 - Tremark Associates Limited, Registered Company Number: 3120853
 - Tremark ASP Limited, Registered Company Number: 9653164
- 13.2 Tremark's registered office and head office address: Joshua Chambers, 332 York Road, Leeds, LS9 9DN
- 13.3 Our Information Security Officer is Mark Hodgson who can be contacted by telephone on +44 113 2636466 or via email to mark.hodgson@tremark.co.uk.