

Dalkeith CAB

Debt Advice Privacy Policy



1. Introduction. When you contact us, we collect personal information about you so we can help you with your debts.

1.1 We'll seek your permission to hold your data by asking you:

1.1.1 To verbally agree

1.1.2 To tick a box online; or

1.1.3 Directly by post, electronically (email or webchat) or over the phone.

1.2 If you call us, we may record the conversation for training and monitoring purposes.

2. What information will we request? We only record and use information that will help us support you with your debt issues.

2.1 This may include your:

2.1.1 Name, address and date of birth

2.1.2 Contact details

2.1.3 Debts, creditors and reference numbers

2.1.4 Income and expenditure

2.1.5 State of health

2.1.6 Family circumstances

2.1.7 Housing situation.

2.2 We'll also need to collect proof of identity and proof of income and expenditure. This may include a copy of your bank statement, tenancy agreement, mortgage statement, utility bills, payslips, benefits letters or pension statements.

3. How will we use your information? The main reason we need your information is to work out which debt solution are available to you.

3.1 We'll also access your information in order to review your situation if required - we'll contact you when we do this to check if your circumstances or details have changed.

3.2 We'll only access your information for other reasons if we really need to - for example:

3.2.1 For training and quality purposes

3.2.2 To investigate complaints

3.2.3 To help us improve our services.

3.3 We might use your contact details to get in touch about your experience of our service or ask you to take part in surveys or research - we'll only do this if you give us permission.

- 3.4** We use some information to create statistics about who we're helping and what issues they face. This information is always anonymised - you can't be identified.
- 3.5** We share these statistics with funders, regulators, government departments and publicly on our blogs, reports, social media and press releases. The statistics also inform our policy research, campaigns, or media work.
- 4. When might we share your information with others?** Sometimes we share your personal information with other organisations - we only do this to help you deal with your debts, or to monitor the quality of our services. We'll get your permission before doing this. Organisations we share your data with must store and use it in line with data protection law - they can't pass it on or sell it without your permission.
- 5. Who might we share your information with?**
- 5.1** We'll share your information with your creditors so we can make offers of repayment or requests for a moratorium.
- 5.2** If you have chosen to enter bankruptcy or the Debt Arrangement Scheme (DAS), we'll share your information with the Accountant in Bankruptcy (AiB) so that they can process your application. Please note that if you enter bankruptcy or the DAS scheme, the AiB will place some of your details on a publicly accessible register. The AiB are obligated to do this under Scotland's debt laws.
- 5.3** If you've chosen a Protected Trust Deed (PTD) we'll send your information as a referral to your chosen provider, so that they can process your application.
- 5.4** The Financial Conduct Authority (FCA) might ask us to share a randomised sample of client cases which are being dealt with by the bureau. This is to make sure the advice and service you get is lawful and meets the FCA rules and regulations.
- 5.5** We might choose to use your information for research purposes on the basis of 'legitimate interest'. This means it will help us carry out our aims and goals as an organisation - for example, to create case studies and statistics for our national research. If we use it in this way, your personal details will be anonymised.
- 6. What will we do if we're concerned about yours or someone else's safety?** If something you've told us makes us think you or someone you know might be at serious risk of harm, we could tell the police or social services - for example if we think you might hurt yourself or someone else.
- 7. How will we store your information?**
- 7.1** Whether you get advice face to face, over the phone, by email or webchat, our adviser will log all your information, correspondence, and notes about your problem in our secure CASTLE online case management system
- 7.2** Some of your information might also be kept within our secure email and IT systems.
- 7.2.1** Your information is retained for 7 years, plus the length of the debt remedy you have entered into, as this is required by law.

7.2.2 If your case has been subject to a serious complaint, insurance claim or other dispute we keep the data for 16 years, or the length of the debt remedy you have entered into, whichever is longer, as this is required by law.