

PRIVACY POLICY

Hastings & Co (Insolvency) Ltd acts as both a Data Controller and a Data Processor and is registered with the Information Commissioner's Office.

Both Colin Hastings and Linda Hastings act as Data Controllers when engaged in formal insolvency appointments and utilise Hastings & Co (Insolvency) Ltd to act as Data Processor in such circumstances. Both parties are registered with the Information Commissioner's Office.

We are committed to meeting the basis principles of Data Protection and undertake to :-

1. Ensure that all data is processed lawfully, fairly and transparently
2. Ensure that all data is obtained only to the extent required for specific and lawful purposes
3. Ensure that all data processing is relevant and not excessive
4. Ensure that data is accurate and kept up to date
5. Ensure that data is retained only for the necessary period
6. Ensure that data is kept securely

What type of data we hold

Any personal information collected will depend on individual circumstances but typically will include the following :-

1. Name
2. Date of Birth
3. Address
4. Photographic identity documents
5. Financial information including bank details if relevant

We process only basic personal data and do not process sensitive personal data.

Why we collect data

We collect data to ensure that we can provide the following :-

1. Professional services relating to insolvency
2. Verification of identity
3. Detection of crime, fraud or corruption
4. To meet our obligations as an employer
5. To comply with statutory obligations as insolvency practitioners
6. To investigate financial transactions and conduct
7. To communicate with relevant parties

Where we obtain information from

We may gather information about you from the following :-

1. Solicitors
2. Accountants
3. Courts
4. Government Departments
5. Banks and other financial institutions
6. Creditors
7. Suppliers
8. Public registers
9. Any third party who can provide information relative to the financial affairs of an insolvent individual or Company.

Who we share information with

Data obtained in the process of a formal insolvency appointment may be shared with the following :-

1. HM Revenue & Customs
2. The Insolvency Services
3. The Accountant in Bankruptcy
4. Creditors
5. Employees
6. Solicitors
7. The Court
8. Any third party with a legal right to obtain such information

The above list is not a full list but we will always ensure that the party being provided with the information is legally entitled to make such a request and will process any such data in full compliance with data protection law.

Your rights

You have the right to :-

1. A copy of the data that we hold about you. Please note that this may be subject to limitations and full details of any such exemptions will be provided upon request.
2. Request us to amend any inaccurate information and we undertake to correct any records within 10 working days from notification
3. Request data about you be deleted however this is subject to such data not being required for legal use or to fulfil statutory functions
4. Request data be transferred to another organisation. Please be aware that there be limitations on the manner in which this can be done due to the nature of our software.
5. Object to certain uses of your data, such as for marketing purposes. Where such an objection is received, this will relate only to the use of your data and not to the storage of it.

How we protect and retain data

All data in relation to formal insolvency appointments is retained for five years post discharge of the appointment holder.

All other data is held for six years. Earlier destruction of data will be considered upon request.

All data is held and processed within the United Kingdom with the exception of formal insolvency appointments with assets or business interests abroad. Data will, in those circumstances, be released only to the extent necessary to fulfil any statutory functions.

Any enquiries relating to our data protection policy should be addressed to data@hastingsinsolvency.com.

How to contact the Information Commissioner's Office

Should you require further information or wish to make a complaint, the Information Commissioner's Office can be contacted via their website at <https://ico.org.uk/make-a-complaint/> or by telephoning 0303 123 1113