

PRIVACY POLICY

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Recovia Ltd ("we", "us") is a commercial debt recovery agency registered in England and Wales (Company No. 16956861), with registered office at 3rd Floor, 86-90 Paul Street, London EC2A 4NE. We are registered with the Information Commissioner's Office under registration number **ZC115879**.

This policy explains how we collect, use and protect personal data. It covers four groups of people: **debtors** we are instructed to contact; **clients** and their staff; **website visitors**; and **job applicants**.

1. Debtors — people we contact about a debt

Who we are in data protection terms. When we pursue a debt we act as a Data Controller in respect of the personal data we hold about you, including data we obtain ourselves through credit reference searches, insolvency registers, Companies House, Land Registry and our case management activity. The creditor who instructed us is a separate Data Controller in respect of the data they provide to us.

What we process: names, addresses, contact details, employment information, financial information, credit history and records of our communications with you.

Why, and on what lawful basis: to recover a debt lawfully owed to our client. Our lawful basis is **legitimate interests** — ours and the creditor's interest in recovering sums lawfully due, which we have assessed is not overridden by your rights in these circumstances.

Who we share it with: the creditor; our appointed solicitors; High Court Enforcement Officers; tracing agents; credit reference agencies; and the courts where proceedings are issued. We do not sell personal data.

How long we keep it: for the duration of the case and 6 years thereafter, in line with our legal obligations.

2. Clients and their staff

We process the business contact details of our clients and their staff (names, roles, email addresses, telephone numbers) to deliver our services, manage the relationship, issue statements and invoices, and meet our legal obligations. Our lawful bases are the performance of our contract and legitimate interests. Client data is retained for the duration of the relationship and 6 years thereafter.

3. Website visitors

When you visit www.recoviaholdings.co.uk we collect technical data (IP address, browser type, pages visited) through cookies and analytics, used to operate and improve the site. Non-essential cookies are used only with your consent, which you can withdraw at any time via your browser or the site's cookie controls. Analytics data is retained for 12 months. Enquiries submitted through our contact forms are processed on the basis of legitimate interests to respond to you.

4. Job applicants

If you submit a CV or application we process it to consider you for employment or engagement, on the basis of taking steps prior to entering a contract. Application data is retained for up to 2 years for future opportunities unless you ask us to delete it sooner.

5. Security

We apply appropriate technical and organisational measures to protect personal data, including encryption of data in transit, access controls limited to authorised personnel, and regular review of our security arrangements.

6. International transfers

We do not transfer personal data outside the UK except where appropriate safeguards are in place in accordance with UK GDPR. Where an international recovery requires a transfer, the client will be informed of the safeguards before any transfer takes place.

7. Your rights

Under UK GDPR you have the right to: access the personal data we hold about you; have inaccurate data corrected; have data erased in certain circumstances; object to or restrict processing in certain circumstances; and data portability where applicable. Where processing is based on legitimate interests, you may object and we will consider your objection against the grounds for processing.

To exercise any right, contact contact@recoviaholdings.co.uk or write to us at the registered office. We respond within one month.

You also have the right to complain to the Information Commissioner's Office: www.ico.org.uk · 0303 123 1113.

8. Changes to this policy

We review this policy at least annually. The current version is always available at www.recoviaholdings.co.uk. Material changes affecting how we process debtor or client data will be notified where practicable.

9. Contact

Recovia Ltd, 3rd Floor, 86-90 Paul Street, London EC2A 4NE · contact@recoviaholdings.co.uk · 01527 369593

REC-POL-001 · Version 2.0 · August 2026 · Supersedes "Privacy Policy, 21 March 2026", which is withdrawn. Approved: Ben Portman, Managing Director.