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 six groups of people: **debtors** we are instructed to contact; **directors and officers** of companies we check for our clients; **clients** and their staff; **business contacts** we approach about our services; **website visitors**, including users of our website chat; 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; collection agents and IT and AI service providers acting on our instructions; and the courts where proceedings are issued. We do not sell personal data.

Call recording: we record telephone calls with you for quality checks, training, complaint handling and as evidence. Recordings are kept as part of our case records, for the same period.

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

2. Company checks for our clients

When a client orders a Debtor Check on a limited company or LLP, we report what public registers and our data sources show about that company, including the names and appointments of its directors and other officers. We obtain this from Companies House, The Gazette, court judgment registers and a credit reference agency. Our lawful basis is **legitimate interests**: helping businesses decide whether, and how, to recover money owed to them. The report goes only to the client who ordered it, for use within its business. We keep a copy for 6 years.

3. 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.

Credit checks. Before we take on a client, and from time to time while we act for them, we check the client's credit status. Where the client is a sole trader or partnership, and when we check a company client's directors or owners, this involves personal data: name, address, date of birth where needed, directorships, county court judgments, insolvency records and credit information. We obtain it from Companies House, the Register of Judgments, Orders and Fines, The Gazette, insolvency registers and credit reference agencies. Our lawful basis is **legitimate interests**: assessing the risk of providing our services on credit before and during the relationship. A person reviews every result; we do not make decisions about you by automated means alone. Credit reference agencies explain their own use of personal data in the Credit Reference Agency Information Notice (CRAIN), available on their websites.

Who we share it with: IT and AI service providers acting on our instructions, who process it only to help us deliver our services, and credit reference agencies when we carry out a credit check. We do not sell personal data.

4. Business contacts we approach

We may email people in their business role at limited companies, LLPs and PLCs to tell them about our services. We use a work email address only where the business has published it (for example on its own website, or as a contact in a published notice), and we tell you in our first email where we found it. We hold your name, role, company, work email address, where we found it, and a record of our emails and any reply. Our lawful basis is **legitimate interests**: offering a relevant service to businesses. You can object at any time by replying to our email or contacting us, and we will not email you again. We delete your details 2 years after our last contact. If you ask us not to contact you, we keep your email address on a suppression list only so that we never contact you again.

5. 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.

Website chat: our website chat is an AI assistant, not a person. When you use it, we collect what you type and any name, email address or telephone number you give us, so that we can answer your enquiry and pass it to our team where needed. An AI service provider processes the chat for us, on our instructions. Our lawful basis is legitimate interests: responding to enquiries. Chat transcripts are kept for 12 months, unless

they become part of a case or complaint record, which we keep for the period that applies to that record. You can ask to speak to a person at any time.

Our newsletter: if you sign up to The Overdue Brief, we use your email address to send it monthly. We send it only to people who have asked to receive it. Our lawful basis is your consent, which you can withdraw at any time using the unsubscribe link in each email. We keep your email address until you unsubscribe.

6. 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. If you are not appointed, we keep your application for 12 months after the role is filled, then delete it. If you agree, we keep it for up to 2 years to consider you for future roles. You can ask us to delete it sooner at any time.

7. 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.

8. 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.

9. 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. Where processing is based on consent, you may withdraw it at any time.

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.

10. 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.

11. Contact

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

REC-POL-001 · Version 6.2 · November 2026 · Supersedes Version 6.1 (November 2026). Change: business contacts we approach (new section 4); later sections renumbered. Approved by the Board of Directors.