



A Company of Bailiffs Ltd

Privacy Policy

This Policy should be read in conjunction with the ACOB Ltd Data Protection Policy and Information Security Policy. These Policies are available on written request.

For the purpose of this document ACOB Ltd Directors, Employees and sub-contractors are collectively referred to as Agents.

1. Purpose

- 1.1. The purpose of this policy is to ensure ACOB Ltd complies with UK Law in relation to the protection of personal data and information concerning any individual recorded, retained and processed, and respects the Privacy of all individuals it has dealings with including our clients, sub-contractors, professional contacts, and individuals subject of Company activities.
- 1.2. We will record and retain information voluntarily provided in the course of business by:
 - Agents.
 - Clients.
 - Professional contacts.
 - Individuals subject of investigation/action by Agents.
- 1.3. Information we are likely to collect/retain when voluntarily provided:
 - Full Name.
 - Biometric data e.g. Date of Birth / Age.
 - Address (Business and Home).
 - Contact Details (phone numbers and email addresses).
 - Information concerning the matter subject of action/services provided by ACOB Ltd.
- 1.4. Information we may collect concerning Individuals subject of investigation/action where it is necessary for our legitimate interests:

- Full Name.
- Biometric data e.g. Date of Birth/ Age.
- Address (Business and Home).
- Contact Details (phone numbers and email addresses).
- Information concerning subject lifestyle to facilitate appropriate use of resources and for the safety of Agents.
- Photographs of the individual from open-sources to assist identification.
- We may photograph, video, voice record the individual, and their property for the purpose of evidence gathering, and corroborating our activities.

2. Collection Methods

- 2.1. We are likely to collect information about individuals subject of action where it is necessary for our legitimate interests by use of open-source research and legal access of official records. We may use third party providers to acquire data. The purpose of this information collection may be to identify individuals, assist us in the performance of our lawful activities, or minimise physical risks to ACOB Ltd Agents.
- 2.2. Visits to the ACOB Ltd Website - In the case of visits to the ACOB Ltd webpages, we may use Cookies to track and optimise webpage behaviour. Should a person object, they are free to turn off cookies in their local browser.
- 2.3. In the case of communication via our website requesting contact will record the details provided by the potential client.

3. Information we Do Not Collect

- 3.1. We do not collect any Special Categories of Personal Data about individuals, this includes details about race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about health. We do not collect information about children of individuals subject of action.

4. Use of Information

- 4.1. ACOB Ltd will only record information where it is voluntarily provided or where we have “legitimate interest” in accordance with GDPR legislation. We consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests.

- 4.2. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

5. Compliance with the law

- 5.1. Sometimes, we must process your information to comply with a statutory obligation. For example, we may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order. This may include your personal information.

6. Subject Access Requests

- 6.1. Under certain circumstances, all data subjects have rights under data protection laws in relation to your personal data, these include:
- Request Access - All data subjects have the legal right to request details of information held about them by the company. This enables them to receive a copy of the personal data that we hold about them and to check that we are lawfully processing it. Any subject access requests received by ACOB Ltd should be referred to the Data Controller. The company will respond to any subject access requests promptly, and in any event within a month of the request.
 - Data Correction - You have the right to require us to rectify any inaccurate personal information we hold about you. You also have the right to have incomplete personal information we hold about you completed, by providing a supplementary statement to us.
 - Erasure of Data - This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. If you would like us to destroy information held about you, please let us know. However, please note that if you use any of our services which require you to provide personal information, deleting our records will mean that you will need to resubmit it to continue using such services. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
 - In the case of data recorded in respect of individuals subject of ACOB Ltd action/ lawful activities, personal data will be destroyed 1 year after collection, unless there is a compelling operational, business or legal reason to retain the information for longer.

7. Data Processing Restrictions

7.1. This enables you to ask us to suspend the processing of your personal data by a request in writing in the following scenarios:

- If you want us to establish the data's accuracy.
- Where you need us to hold the data even if we no longer require it because you need it to establish, exercise or defend legal claims; or you have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.

8. Data Breach Notification

8.1. ACOB Ltd shall immediately inform the relevant parties/entities in writing and by e-mail of any Personal Data Breach of which the Company becomes aware, but in no case longer than 24 hours after it becomes aware of the Personal Data Breach. The notification to the relevant parties shall include all available information regarding such Personal Data Breach, including information on:

- The nature of the Personal Data Breach including where possible, the categories and approximate number of affected Data Subjects and the categories and approximate number of affected Personal Data records.
- The likely consequences of the Personal Data Breach
- The measures taken or proposed to be taken to address the Personal Data Breach, including, where appropriate, measures to mitigate its possible adverse effects
- ACOB Ltd shall promptly take all necessary and advisable corrective actions and shall cooperate fully with the relevant parties/entities in all reasonable and lawful efforts to prevent, mitigate or rectify such a breach.

ENDS

Policy Date 31/10/2025