

How we use the personal information of our website users

Lowell are committed to protecting your privacy and that's why we have designed this website to make it easy for you to get all the information you need.

You can find out all about how we use your personal information, who we may share it with and how we protect it, as well as finding out about your rights and how to exercise them.

Select the headings below to find out more.

- [Who are we?](#)

This website, www.lowell.com, is operated by Lowell Portfolio I Ltd and Lowell Financial Ltd to provide you with information about the Lowell group of companies.

Where we use “**we**”, “**our**” or “**us**” in this privacy notice, we mean Lowell Portfolio I Ltd and Lowell Financial Ltd unless we say otherwise. Where we use “**our site**” in this privacy notice, we mean www.lowell.com.

We buy customer accounts where there is an outstanding balance from a wide range of organisations including banks, retailers and credit card, mobile phone, home shopping and utility (gas, electricity and water) companies

If you are a Lowell customer, this means that Lowell has bought your account and we will work with you to arrange repayment of the outstanding balance.

Lowell Portfolio I Ltd buys your account and Lowell Financial Ltd manages your account on behalf of Lowell Portfolio I Ltd. This means that if we write or speak to you, it will usually be Lowell Financial Ltd that you are dealing with.

Company	Lowell Portfolio I Ltd	Lowell Financial Ltd
Company number	Company number 04857418	Company number 04558936
Country	Incorporated in the UK	Incorporated in the UK
Registered office	No.1 The Square, Thorpe Park View, Thorpe Park, Leeds, LS15 8GH	No.1 The Square, Thorpe Park View, Thorpe Park, Leeds, LS15 8GH

We are joint controllers of your information which means that we are both responsible for looking after it.

We also provide credit management solutions to other companies to help them manage the accounts that you have with them.

For details of the UK companies in the Lowell group, please see the section **Who are the Lowell group** below.

- [What information do we collect about you?](#)

Each time you visit this website, we may automatically collect information about you and the device you are using, including:

- information about which pages you visit, actions you perform and which resources you use on our site
- information about how you got to our site
- your internet protocol address known as your IP address which is used to connect your device to the internet
- your device's operating system and platform
- the type and version of the browser you are using
- browser plug-in types and versions which extend the functionality of your browser, for example Pinterest, Evernote and Adblock
- MAC addresses which are used as network addresses for Wi-Fi and Ethernet
- traffic data, which is aggregated information about the number of visitors, sessions, users and page visits to our site
- location data
- time zone setting
- weblogs

If you sign up to receive our newsletters, we will collect your email address.

Please see our Cookies notice for details of the cookies we use on our site.

- [**Where do we get your information from?**](#)

We collect the information you provide to us directly by signing up to receive our newsletters.

We also collect information directly from your device. We use cookies to collect this information. Please see our Cookies notice for details of the information we collect through our websites.

- [**Why do we need your information?**](#)

We need the information we collect automatically about your visit to our site to:

- administer our site
- improve our site to ensure that content is presented in the most effective manner
- allow you to participate in interactive features of our services when you choose to do so
- analyse how visitors use our site (including behaviour patterns and the tracking of visits across multiple devices)
- improve your online experience.

We need the information you provide directly by filling in any of the forms to send you the newsletters you have requested.

We only collect information about you through our site (whether automatically or directly from you) on the basis that you have given your consent to us. You can withdraw your consent to us processing and storing this information at any time.

You can opt-out of receiving our newsletters at any time by following the unsubscribe instructions in any email you receive, or by contacting our Data Protection Officer:

- by letter at Data Protection Officer, Lowell Financial Ltd, PO Box 13079, Harlow, CM20 9TE.
- by telephone.

At any time, you can disable the cookies we use on our site. Please see our Cookies notice for details of how to do this.

You do not have to give us any information. However, if you don't provide us with your name and email address, we won't be able to send you our newsletters and if you disable the cookies we use, you may be able to browse all of our site, but some of the features may not be available to you.

- [Who do we share your information with?](#)

We sometimes need to share some of your information with other organisations.

If you sign up for our newsletters, we will share your information with other companies in the Lowell group, so that we can send you the newsletters you have requested.

We use Google Analytics to collect information about how you use our site. We do this to help us analyse how visitors use our site (including behaviour patterns and the tracking of visits across multiple devices). Google Analytics doesn't collect information that identifies a visitor to our site. All the information that is collected is anonymous and is only used to improve how our site works. Please see our Cookies notice for more details about Google Analytics.

We also use a number of carefully selected third parties to supply us with IT products and services. We will only share your information with our suppliers where it is necessary for them to provide us with the services we need.

- [Where is your information stored?](#)

Your information is generally stored on servers and filing systems in the UK but from time to time it may be stored in or accessed from countries outside the UK. Where this may happen, we always make sure that there are appropriate safeguards in place, such as the model contract clauses, binding corporate rules or the EU-US Privacy Shield, to guarantee that your information – and your rights – are protected to the same high standard as under UK law.

Unfortunately sending information via the internet is not completely secure. Although we do our best to protect your information, we cannot guarantee the security of any information you transmit to our website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to prevent unauthorised access.

Our website may, from time to time, contain links to and from the websites of third parties. If you follow a link to any of these websites, please note that these websites have their own privacy notices and cookie notices and we do not accept any responsibility or liability for those notices or your use of those websites.

- [How long do we keep your information?](#)

We only keep your information for as long as we need it and we will keep your information for no more than 2 years.

If you sign up to our newsletters, we will keep your information for as long as you wish to continue receiving them. If you decide you no longer want to receive our newsletters, we will add your name and email address to our list of people who don't want to receive newsletters from us. We will keep your name on that list for as long as we send out newsletters to make sure that you don't receive any further newsletters.

- [Do we carry out profiling and automated decision-making?](#)

We use Google Analytics to collect details of how you use our site. We do this to help us analyse how visitors use our site (including behaviour patterns and the tracking of visits across multiple devices), administer our site and manage your account. Google Analytics doesn't collect information that identifies a visitor to our site. All the information that is collected is anonymous and is only used to improve how our site works. We do not allow Google to make any attempt to establish the identities of any users of our site. Please see our Cookies notice for more details about Google Analytics.

We do not carry out any other profiling or automated decision-making in respect of the information we automatically collect about you when you visit our site.

- [What rights do you have?](#)

Under the data protection rules, you have a number of rights in respect of your information.

You have the right to	What does this mean?	How does this apply to the way we use your information?
Access your information	You can ask for: <ul style="list-style-type: none"> • confirmation that we process your personal information • a copy of your personal information that we hold and • other information about how we process your information. 	We will provide you with a copy of your personal information which we hold unless the data protection rules provide an exception that we decide to rely on. We may also edit out the names of any other individuals to protect their privacy. Wherever possible, we will provide you with a copy of your personal information in the same manner you make your request unless we agree otherwise with you. This privacy notice also includes the other information you can ask for about how we process your information.
Have your information rectified	You can ask us to rectify your information if it is not accurate, complete or up to date.	We will update or correct your information, although sometimes we may need to ask you to provide evidence to confirm the changes, for example a copy of your marriage certificate if you are changing your name because you have got married.

<p>Have your information erased</p>	<p>This is also known as the right to be forgotten.</p> <p>You can ask us to delete your information where:</p> <ul style="list-style-type: none"> • we no longer need it • we rely on your consent to use your information and you withdraw it • you object to our processing it and we have no overriding legitimate grounds to continue processing it or • we are legally required to delete it. <p>This right does not apply where:</p> <ul style="list-style-type: none"> • we are legally required to keep your information, for example under the anti-money 	<p>We will delete your personal information:</p> <ul style="list-style-type: none"> • if you withdraw your consent to us collecting information about you automatically when you visit our site, we will delete the information that we hold about you, from which you can be identified • if you object to our processing your personal information and to carry out your request we have to erase your information and • where we no longer need your information. Although our retention policy means that we will delete your information once we no longer need it. Please see How long do we keep your information? for more details. <p>If you opt out of receiving our newsletters, we will not delete your name and address. We will add it to our list of people who don't want to receive newsletters from us to make sure that you don't receive any further newsletters.</p>
-------------------------------------	--	--

	<p>laundering laws</p> <ul style="list-style-type: none"> • we have a compelling legitimate ground for using your personal information or • we need your information to establish, exercise or defend legal claims, for example where there are ongoing court proceedings. 	
<p>Restrict our processing of your information</p>	<p>You may ask us to restrict our processing of your personal information where:</p> <ul style="list-style-type: none"> • you believe the information we hold about you is inaccurate while we check whether it is accurate • we no longer need your information but you need it to 	<p>We will not process your personal information whilst we consider your request.</p> <p>We will inform you if we begin processing your personal information again and explain why.</p>

	<p>establish, exercise or defend a legal claim or</p> <ul style="list-style-type: none"> • you object to our processing your personal information while we reconsider our legitimate interests assessment. 	
<p>Have your information transferred to you and/or a third party</p>	<p>This is also known as the right to data portability.</p> <p>You can ask us to provide you with a copy of the information which you have provided to us and which we hold electronically.</p>	<p>We will provide this information to you in a commonly-used and machine readable format.</p>

<p>Object to our processing of your information, including profiling</p>	<p>You can object to our use of your information, including profiling unless:</p> <ul style="list-style-type: none"> • we have compelling legitimate grounds for using your information or • we need to use your information to establish, exercise or defend a legal claim, for example where there are ongoing court proceedings. <p>You can also object to us using your information for marketing purposes.</p>	<p>We use Google Analytics to collect information about how you use our site. We do this to help us analyse how visitors use our site (including behaviour patterns and the tracking of visits across multiple devices).</p> <p>You can opt out of being tracked by Google Analytics cookies across all websites http://tools.google.com/dlpage/gaoptout</p> <p>If you opt out of receiving our newsletters, we will add your name and address to our list of people who don't want to receive newsletters from us to make sure that you don't receive any further newsletters.</p>
<p>Not to be subject to an automated decision</p>	<p>You can ask us to review any automated decision which has a legal or significant effect for you. You can provide us with your point of view and any additional information that you think we need and ask for a human to reconsider our decision.</p>	<p>We don't make any automated decisions about you using the information we have collected about you through our site.</p>

If you would like to exercise any of your rights, please contact our Data Protection Officer by letter at Data Protection Officer, Lowell Financial Ltd, PO Box 13079, Harlow, CM20 9TE.

- [What if you have a complaint?](#)

If you have any questions, concerns or complaints about the way either Lowell Portfolio I Ltd or Lowell Financial Ltd processes your personal information, please contact our Data Protection Officer in the first instance and they will do their very best to help you by letter at Data Protection Officer, Lowell Financial Ltd, PO Box 13079, Harlow, CM20 9TE.

Our Data Protection Officer deals with data protection for all our UK companies, so whichever Lowell company your question, concern or complaint relates to, please contact our Data Protection Officer using these contact details.

If you are not happy with the way we have handled your complaint or are still concerned about our handling of your personal information, you have a right to take your complaint to the Information Commissioner's Office at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF and www.ico.org.uk.

- [Who are the Lowell group?](#)

The Lowell group is made up of the following companies incorporated in the UK

Lowell Finance Ltd	Company number 05069513
Lowell Portfolio I Ltd	Company number 04857418
Lowell Financial Ltd	Company number 04558936
Lowell Solicitors Limited	Company number 08647091
Fredrickson International Limited	Company number 02679522
Lowell Receivables Financing 1 Limited	Company number 11344999
Interlaken Group Limited	Company number 03167536
SRJ Debt Recoveries Limited	Company number 05064551
Tocatto Ltd	Company number 05069843
Lowell Portfolio III Holdings Limited	Company number 08336897
Lowell Portfolio III Limited	Company number 08096778

Lowell Portfolio IV Holdings Limited	Company number 08647094
Lowell Portfolio IV Limited	Company number 08654105

- [Changes to this notice](#)

We will regularly review this notice and keep it updated to make sure that the information we provide you with is accurate and up to date.

Any changes to this notice will be highlighted so that you can see what has been changed.

This notice was last reviewed and updated in May 2018.

If you would like a copy of this privacy notice or if you have any questions about how either Lowell Portfolio I Ltd or Lowell Financial Ltd use and share your personal information, please contact our Data Protection Officer by letter at Data Protection Officer, Lowell Financial Ltd, PO Box 13079, Harlow, CM20 9TE.