

This is our privacy notice explaining how we use your personal information if you are a Lowell or Overdales colleague.

If you would like a copy of this privacy notice or if you have any questions about how Lowell UK Shared Services Limited, Lowell Group Shared Services Limited, Lowell Financial Limited or Overdales Legal Limited use and share your personal information, please contact our Data Protection Officer by:

- email at dpo@lowellgroup.co.uk
- 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.

- [Who are we?](#)

You are employed by one of the UK Lowell companies:

Company	Lowell UK Shared Services Limited	Lowell Group Shared Services Limited	Lowell Financial Limited	Overdales Legal Limited
Company number	08336897	08647094	04558936	07407310
Country	Incorporated in the UK	Incorporated in the UK	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	No.1 The Square, Thorpe Park View, Thorpe Park, Leeds, LS15 8GH	No.1 The Square, Thorpe Park View, Thorpe Park, Leeds, LS15 8GH
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Where we use “**Lowell**”, “**we**”, “**our**” or “**us**” in this notice, we mean the companies set out above unless we say otherwise.

Lowell UK Shared Services Limited deals with talent acquisition, onboarding of new employees and general HR matters for all of the above companies, so if you speak to or receive any communication from a member of our talent acquisition, onboarding or other HR teams, it will usually be Lowell UK Shared Services Limited that you are dealing with.

If you are an employee of Lowell UK Shared Services Limited, Lowell UK Shared Services Limited is the controller of your information.

As Lowell UK Shared Services Limited deals with talent acquisition, onboarding and other HR matters for all our UK companies, this means that Lowell UK Shared Services Limited, and the company you are employed by are joint controllers of your information which means that both organisations are responsible for looking after your information.

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

We collect:

- your name (including any previous names and the dates when you were known by these names)
- your contact details (including your current and previous addresses for the last 7 years, telephone numbers and e-mail addresses)
- your gender
- your date of birth
- your National Insurance number

- evidence of your right to work in the UK including information about your immigration status (where relevant), such as copy of your passport (including biometric data if you use your smartphone to scan the chip in your passport when using the Experian, please see the section [What employment checks do we carry out?](#) below for further details, full birth certificate, visa, National Identity cards or biometric residence permit
- proof of your current address, such as a bank or credit card statement or utility bill
- your work history and other relevant experience
- evidence of your work history and other relevant experience, including documents evidencing payment of your salary or wages or payment of tax such as a P60 or HMRC tax report and where necessary, your employee number with your previous employers
- where you have been out of work for an extended period of time, we may also ask for evidence relating to income you received during that period, such as Universal Credit or a Carer's Allowance
- your education including degrees awarded, transcripts and other information provided in support of your application for a role with us
- your qualifications
- details of any professional memberships
- information collected during telephone screenings and interviews and any assessment centres you may attend, including the results of any language or technical tests you take or psychometric assessments carried out and CCTV images if you attend our offices
- details of your character referee, including their name, address and occupation
- details of your emergency contact, including their name, their relationship to you and their contact details
- any other information collected as part of the talent acquisition process, including as a result of the employment checks we carry out. For more details about the employment checks we carry out, please see the section [What employment checks do we carry out?](#) below
- details of any accounts you have with any member of the Lowell group (including but not limited to, Lowell Portfolio I Ltd, Lowell Financial Ltd, Lowell Solicitors Limited and Overdales Legal Limited)
- information about your current financial status, including details of any financial defaults, unsatisfied county court judgments (**CCJs**), individual voluntary arrangements (**IVAs**), or any other undischarged bankruptcy proceedings
- any other information contained in your CV
- employee reference number / ID numbers
- bank account details and payroll information including expenses information
- salary and benefits package
- pension and tax information

- performance reviews, appraisals,
- any disciplinary proceedings and their outcomes
- any grievances and their outcomes
- absence information
- employment history with Lowell
- the results of any training programmes, assessments or exams which you take in the course of your employment with Lowell
- your photo
- video and/or audio recordings which you participate in
- information which you post on our intranet and colleague engagement platforms, such as Yammer or Bright
- information you provide by participating in any colleague engagement initiatives, such as our Involve groups
- your vehicle registration and its make and model
- details relating to your driving licence and car insurance if you drive as part of your role
- details of your travel for work including your passport details if you travel abroad
- correspondence which you send using our systems including emails you send (whether these are business or personal)
- recording of our calls with you and calls which you make or receive using Lowell's telephone system
- CCTV images
- information gathered through Lowell's monitoring of its IT systems (including details of your internet browsing), building access records and CCTV recordings
- information relating to health and safety at work and accidents at work

We collect information about your mental and physical health where we need to do so to:

- make reasonable adjustments to your working environment
- manage your absence including paying you sick pay or maternity/paternity pay
- dealing with any accidents at work
- help you to return to work and assess whether you are still able to perform your role.

For more details about how we use this information, please see the section [Special categories of personal data](#) below.

Given the nature of our business, we ask you to tell us about any criminal convictions you may have and we carry out a criminal records check as part of our employment checks. If you apply

for an internal vacancy, we may carry out further checks depending on the nature of the role you apply for. Before we carry out any checks, you will be asked to complete our Background Check form which will explain which checks we intend to carry out.

From time to time, we may need to update the employment checks we have for you, but we will let you know before we carry out any more checks on you.

For more details about how we use this information, please see our [applicant privacy notice](#), the sections What employment checks do we carry out? and Information relating to criminal convictions below.

If you are also a customer of Lowell, please see our [customer privacy notice](#) for details of what information we collect about you as our customer and how we use, store and protect that information.

You must make sure that the information we hold about you is up to date and you must notify us of any changes so that we can make sure that we keep your records accurate, complete and up-to-date.

For details about the information we collect about you through our website, please see our [Website User](#) privacy notice and our [Cookie](#) notice.

- **[What employment checks do we carry out?](#)**

As part of our talent acquisition process, we will confirm the information you provide to us by contacting your former employers and your university or further education establishments. We will also ask for references for either the last two years or the last five or six years depending on the role you apply for. We may also ask for character references in some circumstances. We may collect publicly accessible information about you, for example through a Google search, to make sure that you are suitable for the role you are applying for.

We also use Experian to carry out the following checks on you if you accept an offer of employment with Lowell:

- right to work checks
- adverse financial checks
- a basic or enhanced criminal record check depending on your role.

Right to work checks

We need to confirm that you have a right to work in the UK. We may do that in person by checking your documentation or remotely using Experian to perform these checks for us. You can use Experian's self-service app to provide your passport number (or you may be able to use your smartphone to scan the chip in your passport) or birth certificate and National Insurance number which Experian will compare to their identity verification database or with the Home Office to confirm that you have a right to work in the UK. If you have a visa, they will also

tell us the amount of time remaining before your visa expires. If you can't use the app, we may send the information to Experian for you.

Adverse financial checks

These checks confirm whether there is any adverse data recorded on your credit file relating to defaults, county court judgments (or similar judgments from other courts), voluntary arrangements or bankruptcy. This check is called a 'soft search' and may leave what is known as a "soft footprint". This means that it is not visible to any other organisations and will not affect your credit score. It can only be seen by you, us and the credit reference agency and will show as account administration on your credit file.

Criminal record check

Experian will also use the services of the Disclosure and Barring Service to undertake on your behalf, a criminal record check which details unspent convictions under the Rehabilitation of Offenders Act 1974 to verify the information you provide us in your application form. If you have worked overseas in the last 5 years, Experian will also do an overseas criminal check on you.

For more details about Experian and how it uses and shares personal information, please see the section Where do we get your information from? below and www.experian.co.uk/privacy-policies.html. More information about the Disclosure and Barring Service is available at www.gov.uk/government/organisations/disclosure-and-barring-service.

Depending on the type of role you accept with Lowell, we may also use Experian to carry out:

- a check of the electoral roll
- a director's search at Companies House
- a sanctions check
- a Financial Conduct Authority check
- a media check

The personal information we have collected from you will be shared with Cifas who will use it to prevent fraud, other unlawful or dishonest conduct, malpractice and other seriously improper conduct. If any of these are detected you could be refused certain services or employment. Your personal information will also be used to verify your identity. For more details about how your information will be used by us and Cifas, please see the [Cifas privacy notice](#).

Before we carry out any checks (other than contacting your former employers and your university or further education establishments to confirm the information you have provided and your referees and character referees), we will send you our Background Check form for you to complete which will explain which checks we intend to carry out.

Depending on the type of role you accept with Lowell, we may update the employment screening checks on you from time to time.

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

<p>Information that you give us</p>	<p>You give us information about yourself, your work experience and other relevant experience, your education, your qualifications and your circumstances:</p> <ul style="list-style-type: none"> • during the talent acquisition process • by completing our onboarding forms • by filling in our internal forms or submitting requests • as part of the day-to-day management of your relationship with us as a Lowell colleague • by visiting our intranet and using our IT systems • by posting information on our colleague engagement platforms and participating in colleague engagement initiatives • by visiting our website, setting up an online account through our website and filling in forms on our website. <p>Please see the section What information do we collect about you? of our applicant privacy notice for more details about the information we collect about you during our talent acquisition process.</p> <p>Please see our Website User privacy notice and our Cookie notice for details of the information we collect through our website.</p>
<p>Information that we collect about you</p>	<p>We collect information about you as part of the day-to-day management of your relationship with us as a Lowell colleague, for example from your team leader or your colleagues.</p> <p>We may collect information about you that is publicly accessible, for example:</p> <ul style="list-style-type: none"> • through a Google search • news and social media reports • entries in online directories and • information which is available at Companies House • information which is available from the Financial Conduct Authority <p>Where you use our systems to:</p>

	<ul style="list-style-type: none">• send emails, Teams or Zoom messages (including personal emails), we reserve the right to inspect, examine or monitor those communications without further notice• interact with other colleagues, we reserve the right to inspect, examine or monitor such interactions without further notice and monitor the extent and frequency of use• browse the internet, we monitor the types of sites you access, the extent and frequency of use of the internet. <p>We will also capture and review all card purchases and payments made over our internet (including card details) to prevent and detect fraud and potential breaches of our information security policy.</p> <p>For more details, please see our Information Security Policy and our Acceptable Use Policy which are available on our intranet.</p> <p>When you visit our website, we collect information about you and the way you use our website. Please see our Website User privacy notice and our Cookie notice for details of the information we collect through our website.</p>
Information that you ask us to collect from third parties	<p>If you specifically ask us to collect information from a third party, we will do so in accordance with your request, which we may ask you to put in writing. This may include:</p> <ul style="list-style-type: none">• in certain circumstances, the previous provider of your private medical insurance if you are transfer your existing insurance when you become a Lowell colleague• organisations who are providing you with support such as mental health support or occupational health support

**Information
that we
obtain
from Experian**

We use Experian to carry out employment checks about you.

Experian is a credit reference agency. Credit reference agencies (or CRAs) hold personal information about individuals. Most of the personal information they hold relates to how you have maintained your credit accounts. They also hold address details and information taken from public sources, such as the electoral roll, public records including CCJs and bankruptcy and insolvency information. If you are financially associated with another person (which means that you have a joint credit account or mortgage with them), we will receive financial information relating to that association.

Experian will provide us with details of any of the following which are recorded on your credit file:

- financial defaults
- CCJs (or similar judgments from other courts)
- IVAs
- any other undischarged bankruptcy proceedings

This check is called a 'soft search' and may leave what is known as a "soft footprint". This means that it is not visible to any other organisations and will not affect your credit score. It can only be seen by you, us and the credit reference agency and will show as account administration on your credit file.

Experian has put together an information notice which explains in more detail, how Experian uses and shares personal information about you which is available at www.experian.co.uk/privacy-policies.html.

In some circumstances, Experian may also process some of the references we obtain, including:

- education references where the education provider charges a fee for providing the reference
- references which are not provided in English and need to be translated

For details about the information we share with Experian, please see [Who do we share your information with?](#)

Experian will also use the services of the Disclosure and Barring Service to undertake on your behalf, a criminal record check which details unspent convictions under the Rehabilitation of Offenders Act 1974 to verify the information you provide us in your application form.

More information about the Disclosure and Barring Service is available at www.gov.uk/government/organisations/disclosure-and-barring-service and the section [Information relating to criminal convictions](#) below.

	<p>Experian may also carry out right to work checks on our behalf. For more details, please see the section What employment checks do we carry out? above for further details.</p>
Information that we may obtain from Cifas	<p>The personal information we have collected from you will be shared with Cifas who will use it to prevent fraud, other unlawful or dishonest conduct, malpractice and other seriously improper conduct. If any of these are detected you could be refused certain services or employment. Your personal information will also be used to verify your identity. For more details about how your information will be used by us and Cifas, please see the Cifas privacy notice.</p>
Information that we obtain from regulatory bodies and professional associations	<p>If you are a member of a regulated profession, such as a solicitor, we may obtain information from your regulatory body or professional association such as The Law Society.</p> <p>If you have previously held a role as an approved person or you are applying for such a role with Lowell, we may also obtain information from the Financial Conduct Authority.</p>

<p>Information that we receive from other companies in the Lowell group</p>	<p>We may receive information about you from other members of the Lowell group of companies:</p> <ul style="list-style-type: none"> • so that Lowell UK Shared Services Limited is able to provide talent acquisition and other HR related services to Lowell Group Shared Services Limited, Lowell Financial Limited, Lowell Solicitors Limited and Overdales Legal Limited • for our internal administrative purposes including creating and analysing management information and HR reports • to monitor our compliance with our legal, professional, regulatory and other corporate governance obligations
<p>Call recording</p>	<p>We may monitor and/or record calls for the purposes of training, improving our quality and service standards and resolving issues with customer accounts or with colleagues.</p> <p>For details of when we may share call recordings with third parties, please see the section Who do we share your information with? below.</p>
<p>CCTV images and building access</p>	<p>We operate CCTV at all of our premises. Whilst you are on site at any of our offices, you may be recorded by our CCTV system.</p> <p>For details of when we may share CCTV images with third parties, please see the section Who do we share your information with? below.</p> <p>We also collect information about which areas of our premises you visit through our building access systems.</p>

We may combine the information that you give us with the information we collect about you from the other sources listed above.

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

We need your information in order to manage your relationship with us as a Lowell colleague on a day-to-day basis for the purposes of performing your employment contract with us. This includes:

- processing your payroll information and paying your salary
- providing tax information and payments to HMRC
- providing you with a pension and other benefits you have chosen or you are entitled to receive

- monitoring your performance and providing you with feedback
- providing you with training and opportunities to improve your knowledge and skills
- communicating with you about your employment with Lowell
- dealing with any grievances you may have and carrying out any necessary disciplinary proceedings

We also use your information to comply with our legal, regulatory, professional and other corporate governance obligations, for example:

- the Financial Conduct Authority requires us to carry out certain pre-employment checks on individuals applying for senior management and other roles
- to comply with our obligations under the right to work legislation
- to make sure that we provide you with a safe working environment as required by the Health & Safety at Work legislation
- to make sure that we treat everyone fairly and equally as required by the equal opportunities legislation
- to comply with our obligations under the employment rights and pensions legislation
- to comply with our obligations under the anti-money laundering and counter-terrorist financing legislation and for crime and fraud prevention.

We also use your information to meet our legitimate interests, for example:

- to manage our employees effectively, for workforce and headcount management, forecasting and planning purposes
- to provide and monitor access to relevant IT systems and buildings
- to prevent unauthorised access, intrusion, misuse of our IT systems and to protect us against theft or other crime
- to provide and facilitate colleague engagement initiatives
- to prepare for and activate business continuity plans
- to use other companies in the Lowell group to provide IT support functions
- to share with Cifas for the purposes of preventing fraud and money laundering and to verify your identity

Please see the sections [Special categories of personal data](#) and [Information relating to criminal convictions](#) for more details.

Please see our [Website User](#) privacy notice and our [Cookies](#) notice for details of the information we collect through our website.

You must make sure that the information we hold about you is up to date and you must notify us of any changes so that we can make sure that we keep your records accurate, complete and up-to-date.

If you don't provide us with relevant information, we will not be able to manage your relationship with us as a colleague and meet our obligations to you.

- **Special categories of personal data**

Under the data protection laws, information revealing the following are “**special categories of personal data**”:

- racial or ethnic origin
- political opinions
- religious or philosophical beliefs
- trade union membership
- genetic information
- biometric information
- information concerning health (including mental and physical health) or
- sex life or sexual orientation.

We are committed to providing equal opportunities in all areas of talent acquisition, employment, training and promotion at Lowell.

We collect information relating to:

- racial or ethnic origin
- religious or philosophical beliefs
- information relating to disability
- information relating to sexual orientation,

to make sure that we are meeting our commitment and complying with our obligations under the equal opportunities legislation. We do this on the basis that this is in the substantial public interest.

Experian may collect biometric information held within your passport if you use the Experian self-service app to complete the right to work checks remotely and you use your smart phone to scan the chip in your passport.

We may collect information about your physical or mental health in order to make reasonable adjustments to your working environment for you. We only collect the minimum amount of information we need to make such adjustments. We collect this information in order to comply with our obligations as an employer under the equal opportunities legislation.

We will also need information about your physical or mental health in order to manage your absences, including paying you sick pay or maternity/paternity pay, managing your return to

work when appropriate and assessing your ability to perform your role. We use this information to comply with our obligations as an employer under the employment legislation. We will collect this information either from you directly or from someone you have authorised to share this information with us, such as a family member, an occupational therapist, our onsite counsellor, our external employee assistance provider or any other medical professional. We will only collect and share information with those people if you have agreed we can do so, and we may ask you to confirm this in writing.

If we believe you are in immediate danger, including due to a medical emergency, we may process information relating to your physical and mental health conditions (including sharing this information with the emergency services and your emergency contacts) on the basis that it may be a life and death situation.

- **Information relating to criminal convictions**

Given the nature of our business, we ask you to tell us about any criminal convictions you may have and we carry out a criminal records check as part of our employment checks. If you apply for an internal vacancy, we may carry out further checks depending on the nature of the role you apply for. Before we carry out any checks, you will be asked to complete our Background Check form which will explain which checks we intend to carry out.

Experian use the services of the Disclosure and Barring Service to undertake on your behalf, a criminal record check which details unspent convictions under the Rehabilitation of Offenders Act 1974 to verify the information you provide us in your application form. If you have worked overseas in the last 5 years, Experian will also do an overseas criminal check on you.

For more details about Experian and how it uses and shares personal information, please see the section Where do we get your information from? above www.experian.co.uk/privacy-policies.html and More information about the Disclosure and Barring Service is available at www.gov.uk/government/organisations/disclosure-and-barring-service.

We may also use the information we collect about your criminal convictions for the purposes of crime and fraud prevention and for complying with our obligations under the anti-money laundering and counter-terrorist financing legislation.

We only collect the minimum amount of information about your criminal convictions that we need for the purposes of determining whether you are suitable for the role that you are applying for with Lowell.

We collect information about your criminal convictions on the basis that we are required to do so to comply with our legal, professional, regulatory and other corporate governance obligations as employers authorised by the Financial Conduct Authority and Solicitors Regulation Authority.

Where we use information about your criminal convictions and share it with third parties for the purposes of complying with our obligations under the anti-money laundering, counter-terrorist financing and other legislation, we do so on the basis that this is necessary for us to comply with our legal obligations.

We will retain information relating to your criminal convictions for no more than 6 months from the end of the talent acquisition process for the role which you are applying for with Lowell; although we will keep the outcome of the criminal records check we carry out for 7 years from the date your employment with us ends. For further details of how long we will keep your information, please see the section How long do we keep your information for? below.

The personal information we have collected from you will be shared with Cifas who will use it to prevent fraud, other unlawful or dishonest conduct, malpractice and other seriously improper conduct. If any of these are detected you could be refused certain services or employment. Your personal information will also be used to verify your identity. For more details about how your information will be used by us and Cifas, please see the Cifas privacy notice.

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

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

<p>Information that we share with other companies in the Lowell group</p>	<p>We may share your information with other members of the Lowell group of companies:</p> <ul style="list-style-type: none"> • so that Lowell UK Shared Services Limited is able to provide talent acquisition and other HR related services to Lowell Group Shared Services Limited, Lowell Financial Limited, Lowell Solicitors Limited and Overdales Legal Limited • for our internal administrative purposes including creating and analysing management information and HR reports • to monitor our compliance with our legal, professional, regulatory and other corporate governance obligations <p>As Lowell is a multi-national group of companies which operates in a number of EU countries, this may involve your information being shared with Lowell companies which are outside of the UK, although these companies are all based in the European Economic Area.</p>
<p>Information that we share with HMRC</p>	<p>We are required by law to share information about you, including details of your salary and benefits with HMRC for the purposes of HMRC's tax collection activities.</p>

<p>Information that we share with the providers of our pension scheme</p>	<p>As your employer, we are required to automatically enrol you (if you are eligible) into our pension scheme. To do this we need to share information about you including your name, address, date of birth, your National Insurance number, your salary and the amount of your pension contributions.</p>
<p>Information that we share with the providers of our employee benefits</p>	<p>As part of our benefits package, we offer you the opportunity to choose from a number of benefits, including:</p> <ul style="list-style-type: none"> • life assurance • critical illness insurance • private medical insurance • dental insurance • medical cash plan • childcare vouchers • retail discounts • Give As You Earn <p>If you choose to receive any of these benefits, we will share your information with the provider of the specific benefits you have chosen, so that they can provide you with those benefits.</p>
<p>Information that we share with law enforcement and emergency services</p>	<p>If we identify evidence of fraud, money laundering or any other crime (whether financial or otherwise) in relation to your employment, including where you have been the victim of identity theft, we may share those details with the police, the National Crime Agency and other law enforcement agencies. We may also share information with HMRC where appropriate.</p> <p>Where relevant we may also share CCTV images and call recordings with the police, the National Crime Agency and other law enforcement agencies.</p>
<p>Information that you ask us to share with third parties</p>	<p>If you specifically ask us to share information with a third party, we will do so in accordance with your request, which we may ask you to put in writing.</p>

<p>Information that we share with Experian</p>	<p>We share the following information with Experian so that Experian can carry out pre-employment checks for us:</p> <ul style="list-style-type: none"> • your name • your contact details (including your current and previous addresses, email addresses and telephone numbers) • the information you provide when completing our Background Check form that we will send to you if you accept an offer of employment with Lowell • information you provide to evidence that you have a right to work in the UK • copies of your references in circumstances where they process these for us. For more details of when Experian may process your references, please see the section <u>Where do we get your information from?</u> <p>Experian has put together an information notice which explains in more detail, how Experian uses and shares personal information about you which is available at www.experian.co.uk/privacy-policies.html.</p> <p>For more details, please see the section <u>What employment checks do we carry out?</u> above.</p>
<p>Information that we may share with Cifas</p>	<p>The personal information we have collected from you will be shared with Cifas who will use it to prevent fraud, other unlawful or dishonest conduct, malpractice and other seriously improper conduct. If any of these are detected you could be refused certain services or employment. Your personal information will also be used to verify your identity. For more details about how your information will be used by us and Cifas, please see the Cifas privacy notice.</p>
<p>Information that we share with regulatory authorities and Ombudsman Services</p>	<p>Lowell Financial Ltd and Overdales Legal Limited are authorised by the Financial Conduct Authority. This means that we are required to report certain things to the Financial Conduct Authority which may mean sharing information about you if your role means that you will be an approved person and that you will need to be approved by the Financial Conduct Authority. We may also sometimes also be required to report to the Financial Conduct Authority, any disciplinary proceedings we carry out where there has been a regulatory breach.</p> <p>Overdales Legal Limited are authorised by the Solicitors Regulation Authority. This means that we are required to report certain things to the Solicitors Regulation Authority which may mean sharing information about you if there is an issue or complaint in respect of your conduct.</p> <p>We are registered with the Information Commissioner’s Office and if you or a customer make a complaint to them, we may have to share information about you.</p> <p>We also deal with the Financial Ombudsman Service, the Consumer Ombudsman Service, the Legal Ombudsman Service and the Credit Services Association (known as the CSA). If you or a</p>

	<p>customer make a complaint to them, we may share information with them about you in order to resolve the complaint.</p> <p>Where appropriate, we may share CCTV images and call recordings with these organisations.</p>
<p>Information that we share with regulatory bodies and professional associations</p>	<p>If you are a member of a regulated profession, such as a solicitor, we may share information with your regulatory body or professional association such as The Law Society.</p> <p>If you have previously held a role as an approved person or you are applying for such a role with Lowell, we may also share information with the Financial Conduct Authority.</p>
<p>Information that we share with our clients</p>	<p>We may share information about you with our clients, including details of the employment checks we have carried out, the employment contract we have entered into with you and recordings of calls you have made or received with our clients for the purposes of quality assurance, resolving issues on customer accounts and evidence of our compliance with our contractual obligations to our clients.</p>
<p>Information that we share with our third party suppliers</p>	<p>We use a number of carefully selected third parties to supply us with other products and services, such as payroll, occupational therapy services, HR systems and IT services.</p> <p>The information that we share with our suppliers will depend on the nature of the products and services that they provide to us but we will only share the minimum amount of your information which is necessary for them to provide us with the products and services we need.</p> <p>This may sometimes involve your information being shared or stored outside of the UK and outside the European Economic Area. For more details about how we make sure your information is protected if it is shared or stored outside the UK and the European Economic Area, please see the section Where is your information stored? below.</p>
<p>Information that we share with other third parties</p>	<p>If we or any member of the Lowell group of companies merges, transfers or sells part or all of its business or assets or any of its share capital to a third party, your personal information may be disclosed to that third party and its advisers for the purposes of negotiating and completing the merger, transfer or sale. If the merger, transfer or sale does complete, that third party may use or disclose your information as set out in this privacy notice.</p> <p>We may also share your information with our investors, insurers, insurance brokers, lenders, external auditors, legal and other professional advisers where necessary.</p>

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

Your information is generally stored on servers and filing systems in the UK or the European Economic Area (EEA) but from time to time it may be stored in or accessed from countries outside the UK and EEA. Where this may happen, we always make sure that there are appropriate safeguards in place, such as standard contractual clauses or binding corporate rules, to guarantee that your information – and your rights – are protected to the same high standard as under UK law.

<p>Standard contractual clauses</p>	<p>These are a set of standard clauses which have been recognised by the European Commission and the Information Commissioner’s Office as providing adequate protection to personal information transferred outside the UK and EEA.</p> <p>When we include these clauses in a contract with one of the companies we work with, it means that if they transfer your information outside the EEA, they must make sure that your information is just as safe as it is in the EEA.</p>
<p>Binding corporate rules</p>	<p>These are a way for large groups of companies which are based in lots of countries around the world to transfer personal information to companies in their group in a way that complies with the UK data protection laws. The binding corporate rules must be approved by the data protection regulator before the group of companies can adopt them.</p> <p>When one of the companies we work with uses binding corporate rules, it means that if they transfer your information outside the UK, they have procedures in place to make sure that your information is handled in a way that makes sure that your information is just as safe as it is in the UK and EEA.</p>

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

We only keep your information for as long as we need it.

We keep the information we collect about you during the talent acquisition process and the course of your employment with us as part of your employee file for:

- no more than 75 years from the date you cease to be a Lowell colleague in relation to pension information and
- no more than 7 years from the date you cease to be a Lowell colleague in relation to the rest of your employee file.

However, we won't keep all of your information for so long, and we will delete some information much sooner.

For more details about the specific retention periods that will be applied to your information, please refer to our retention policy which is available on our intranet. This policy has been written by considering all the different types of information that we hold about you, understanding how long we need to keep it for and agreeing not to keep it for any longer.

We may sometimes anonymise your information so that we can use the information for our legitimate business purposes such as equal opportunities monitoring to make sure that we are meeting our commitment to valuing and promoting equality in all areas of talent acquisition, employment, training and promotion. If we do this, we will remove any information that can be used to identify you.

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

We don't carry out any profiling of our colleagues who work for any of the UK Lowell group of companies.

We do not make any automated decisions about any of our colleagues or their employment with any of the UK Lowell group of companies.

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

Under the data protection laws, you have a number of rights in respect of your information and the way we use it. Some of these rights only apply in certain situations. We explain below what rights you have, what these mean and how they apply to the way we use 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 	We will provide you with a copy of your personal information which we hold unless the data protection laws provide an exception that we decide to rely on, for example where there are ongoing court proceedings. 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.

	<ul style="list-style-type: none"> • a copy of your personal information that we hold and • other information about how we process your information. 	<p>This privacy notice also includes the other information you can ask for about how we process your information.</p>
<p>Have your information rectified</p>	<p>You can ask us to rectify your information if it is not accurate, complete or up to date.</p>	<p>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>
<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 	<p>As we rely on the fact that we are need your information to (a) perform our obligations under your employment contract with you (b) comply with our legal obligations or (c) protect you where it is a matter of life and death, for most processing of your personal information, we will only be able to delete your personal information:</p> <ul style="list-style-type: none"> • if you have the right to 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 this section How long do we keep your information? above for more details.

	<ul style="list-style-type: none"> • 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 laws which require us to check you have a right to work in the UK • 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 	<p>We will not process your personal information whilst we consider your request. However, we will still be able to process your personal information for the purposes of any ongoing court or other legal proceedings.</p> <p>We will inform you if we begin processing your personal information again and explain why.</p>

	<p>is inaccurate while we check whether it is accurate</p> <ul style="list-style-type: none"> • we no longer need your information but you need it to establish, exercise or defend a legal claim or • 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>This right only applies to the information which you have provided to us which we hold electronically. It does not apply to information that we collect to comply with our legal obligations such as evidence of your right to work in the UK.</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 	<p>We don't carry out any profiling of our colleagues who work for any of the UK Lowell group of companies.</p> <p>This right only applies to the information that we process on the basis that it is in our legitimate interests.</p> <p>We don't use your information for direct marketing.</p>

	<p>grounds for using your information or</p> <ul style="list-style-type: none"> • 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>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>One you have accepted an offer of employment with us, we do not make any automated decisions about you.</p>

We will always do our best to respond to your request within one month of receiving it and any additional information we need to confirm your identity and understand your request.

However, sometimes we may need some more time to deal with your request, particularly if it is complicated. Where this happens, we will write to you within one month and let you know why we need some more time and when we will provide you with our response.

If we are unable to carry out your request, we will send you a response explaining why.

If you would like to exercise any of your rights, please contact our Data Protection Officer by:

- email at dpo@lowellgroup.co.uk or

- 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, query or request relates to, please contact our Data Protection Officer using these contact details.

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

If you have any questions, concerns or complaints about the way either Lowell UK Shared Services Limited, Lowell Group Shared Services Limited, Lowell Financial Limited, Lowell Solicitors Limited or Overdales Legal Limited process your personal information, our Data Protection Officer will do their very best to help you. You can contact our Data Protection Officer by:

- email at dpo@lowellgroup.co.uk or
- 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 handing 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 Portfolio I Ltd	Company number 04857418
Lowell Financial Ltd	Company number 04558936

Overdales Legal Limited	Company number 07407310
Lowell UK Shared Services Limited	Company number 08336897
Lowell Group Shared Services Limited	Company number 08647094
Lowell Receivables Financing 1 Limited	Company number 11344999
Lowell Receivables Financing 2 Limited	Company number 13403235
Lowell Receivables Financing 3 Limited	Company number 13849615
Lowell Portfolio III Limited	Company number 08096778

Lowell Portfolio IV Limited	Company number 08654105
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- [Changes to this notice](#)

This privacy notice was updated in October 2022.

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.

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