1st Locate (UK Limited) Privacy Notice

This document describes how 1st Locate (UK) Limited ('we, us, our') use and share personal data (also called 'Account data') they receive from you or other sources.

Who are we?

1st Locate (UK) Limited, trading as LCS and other trading names, provides debt resolution, debt administration, debt collection, debt purchase, tracing, mailing and business process outsourcing services to organisations across the public and private sectors, including government departments, local authorities, utility providers and telecommunications companies.

Address: 1st Locate (UK) Limited, Apson House, Bullerthorpe Lane, Colton, Leeds, LS15 9JN.

Company Registration Number: 03702599

ICO Registration Number: Z6791585

Authorised and regulated by the Financial Conduct Authority: 705145

Why do we need your Data?

We need your information in order to carry out our services outlined above, including:

- Locating you, contacting you, verifying your identity and confirming that the information we hold about you is correct;
- Understanding your personal circumstances, agreeing payment plans which are individually tailored, and processing any payments that you make;
- Identifying vulnerable customers to help determine whether we need to take further steps to ensure these customers are not disadvantaged in any way;
- Dealing with queries and complaints, complying with a legal or regulatory obligation, and for quality and training purposes; and,
- Liaising with Clients who are instructing us on their behalf, or assigning debt matters, or where we are liaising with a third-party supplier for services related to our business needs.

Depending on the nature of the account, 1st Locate may act as either a Data Controller or Data Processor.

Where we have purchased or been assigned ownership of a debt, 1st Locate acts as the Data Controller because we determine how and why personal information is processed.

Where we act on behalf of a client that retains ownership of the account, that organisation will generally be the Data Controller and 1st Locate will process information on its behalf (the data controller will have a privacy notice on their website detailing how they use your data). In some circumstances, such as complaints handling, fraud prevention, call recording, regulatory compliance and vulnerability management, 1st Locate may act as an independent Data Controller for those activities.

What Information Do We Collect?

We may process:

- Name
- Date of birth
- Address history
- Telephone numbers
- Email addresses
- Account information
- Payment history

- Financial circumstances
- Communication records
- Call recordings
- Vulnerability information
- Complaint information
- Identity verification information

Information may be obtained from clients, debt sellers, credit reference agencies, tracing agents, public registers, local authorities, Government departments and other lawful data sources. We may also obtain personal information where accounts have been legally assigned or sold to us by creditors.

What information do we share?

We may share personal information with:

- Clients and account owners;
- Tracing and data verification providers;
- Payment processing providers;
- IT and hosting providers;
- Professional advisers;
- Regulators and law enforcement agencies where required by law.

We only share information where there is a lawful basis to do so and appropriate safeguards are in place.

The Legal Basis for Processing your Data

1st Locate (UK) Ltd trading as LCS rely primarily on having a **Legitimate Interest** in the necessary processing of your data (UK GDPR Article 6(1)f):

- **Purpose:** It is in both ours and our Client's commercial interests to be able to recover debts that are properly owed. It is also in the Public Interest of the UK's economy for sums owed for services to be able to be recovered in order that those companies can properly operate, and that the cost of borrowing and credit are controlled.
- **Necessity:** We use the minimum amount of information necessary to achieve the purpose for which it was gathered, and we do not gather information that is not necessary to trace, contact and manage your account or payments, and will only use this information where there are no alternative ways of achieving the purpose for which the information was gathered.
- **Balance/Impact:** The information we collect about you is the minimum required to achieve the primary aim of contacting you to discuss an outstanding balance. We only record information that is relevant to the management of the debt, which may also include identifying whether you are a vulnerable customer requiring further support. Where sensitive information or special category data is recorded, further safeguards are enabled to ensure that data is used lawfully, fairly and transparently. How we process your data, therefore, is likely to have a minimal impact on your inherent rights and freedoms allowing us to achieve the purpose in line with our legitimate interests.

In this way, we are acting in good faith to achieve our legitimate business objectives whilst seeking to ensure customers are treated fairly and appropriately.
There will be occasions where we are processing data under more than one Legal Basis, including the following:

- **Performance of a Contract** to which the Data Subject is party to (UK GDPR Article 6(1)b); *in a majority of cases, we will be undertaking processing activities related to billing, payment arrangements, arrears,*

defaults and other contractual payment matters incurred between you, the relevant Data Controller/Client, and/or ourselves;

- **Compliance with a Legal Obligation** (UK GDPR Article 6(1)c); where we need to comply with legal or regulatory requirements and obligations required by certain Authorities or Regulators. *This might include verifying your identity for Anti-Money Laundering purposes, escalating suspicious activity for the prevention of fraud and financial crime, liaising with HMRC, various regulators, HM Courts & Tribunals Service, the Police and other authorities;*
- **Protect the Vital Interests** of a Data Subject (UK GDPR Article 6(1)d); this legal basis will generally only apply if there are concerns over your health, wellbeing or safety;
- **Recognised Legitimate Interests**; Crime prevention, public or national security, safeguarding, national emergencies or information sharing for official functions or public tasks (UK GDPR Article 6(1)ea, as amended by D(UA)A2025); *on rare occasions, we may be requested to share information with organisations performing an official function or task in the public interest; and,*
- **Consent** for one or more specific purposes (UK GDPR Article 6(1)a); regulations require that where you consent to the processing of your information, that consent must be freely given, informed, specific, unambiguous, and given with a positive affirmative action. *Withdrawing consent will only restrict the processing to which that legal basis specifically applies, and will not necessarily restrict the processing of data where there are other legal bases for doing so.*

Your Rights

Your rights are outlined below and if you wish to exercise any of your rights you may do so by contacting CustomerCare@1stlocate.com. We will provide you with a response within one calendar month, and without undue delay.

- **Access to your personal data** – You have the right to establish what of your personal data we are processing, and in most cases you can also ask us to send you a copy of that personal data, either to you or to another organisation, in a readily available format (known as *Data Portability*).
- **Restricting the use of your personal data** – If you are uncertain about the accuracy or our use of your personal data, you can ask us to stop using your personal data until your query is resolved.
- **Correcting or adding to your personal data** – If any of your details are incorrect, inaccurate, or incomplete, you can ask us to correct them or to add to that information.
- **Right to Erasure** – Otherwise known as the 'Right to be Forgotten', you can request the deletion of your personal data. *Please note that in some circumstances, particularly where there is an overriding legitimate interest – such as a balance still being owed - we may not always be able to comply with your request.*
- **Withdrawing your consent** – Where you have provided consent for us to use your personal data, you have the right to withdraw this at any time. *Withdrawal of consent does not invalidate processing that was carried out before you withdrew that consent, nor does it restrict or prevent the processing of your data where consent is not the primary or only legal basis for doing so.*
- **Objecting to the use of your personal data for legitimate interests** – You have the right to object to any processing carried out on the basis of legitimate interests. We will re-assess your circumstances and the balance and necessity between our legitimate interests and the impact on your inherent rights. Where we have a compelling reason that our legitimate interest is not deemed to be outweighed by your privacy rights, we may continue to process your data on this basis. However, we will in any event inform you of the outcome of such an assessment.
- **Objecting to direct marketing** – You have a specific right to object to your personal data being used for direct marketing purposes; however, this is not an activity that we do.
- **Objecting to automated decision making** – We do not make decisions about individuals solely through automated processing which produce legal or similarly significant effects.

How we store your Data and for how long?

Data held by 1st Locate (UK) Ltd is located on secure servers in the UK; where data is held by third party processors on our behalf, we have verified that their servers are within either the UK or the EU. Where personal data is processed outside the UK, we ensure appropriate safeguards are in place in accordance with UK GDPR requirements.

When the processing of data has completed, and there is no further need to use the data, we will store written data for 6 years in accordance with standard data protection practices unless a valid request for erasure is received and there is no overriding legal, regulatory or legitimate business reason requiring retention.

Call recordings are generally retained for 12 months before being securely deleted. In some circumstances, recordings may be retained for longer to meet legal, regulatory, contractual, or client requirements. For further information, please contact our Data Protection Officer.

Contact Us

We have an appointed Data Protection Officer ("DPO") who is responsible for overseeing the Organisation's compliance with data protection legislation. If you have any questions about this privacy notice, how we use your data or how you may exercise your specific rights detailed above please contact the DPO at CustomerCare@1stlocate.com

We hope to be able to resolve any issues in the first instance, however if you remain unhappy with our response then you have the right to complain to The Information Commissioner.

The Information Commissioner can be contacted by visiting their website at ico.org.uk, or contacting them by phone on 0303 123 1113, or writing to them at The Information Commissioner, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

Changes to our Privacy Policy

If we need to use your personal data for a new purpose which we have not previously informed you about, or the basis on which we process your data materially changes, we will where viable contact you directly to explain the new use of your personal data. Where these changes affect a majority of the Data Subjects that we process information on, we will update this Privacy Notice and publish a bulletin on our website drawing attention to these changes.

Making sure that we keep you up to date with information on your data rights is a continuous responsibility and we keep this Privacy Notice under constant review. We will update our notice as and when legal and regulatory changes are required.

This privacy notice was last updated on the 1st October 2026.