

Who are we?

JPS Financial Ltd (collectively referred to as "JPS Financial", "we", "us" or "our" in this privacy notice) are a claims management company, helping consumers obtain redress for financial mis-selling.

This privacy policy sets out how JPS Financial Ltd uses and protects any information that you give JPS Financial Ltd when you use our website and service. We adhere to the General Data Protection Rules 2018

Your privacy is important to JPS Financial Ltd. We are committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using this website, then you can be assured that it will only be used in accordance with this privacy statement.

JPS Financial Ltd is the controller and responsible for your personal data. We have an appointed Data Protection Officer, who is responsible for overseeing any queries to this privacy notice. If you have any questions relating to this notice, please use the following contact details: Data Protection Officer, JPS Financial Ltd, 8 Trumpet St, Manchester, M1 5LW

JPS Financial Ltd may change this policy from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes. This policy is effective from 25 May 2018.

Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement.

What information do we collect

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Usage Data** includes information about how you use our website.

- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

How do we collect your information

We collect your data by the direct action of you entering your identity and contact data on the contact forms located on our website. Filling in our forms, corresponding with us by post, phone, email or any other method of communication.

Information can also be collected by automated technologies, collecting data as you interact with our website. This may include collecting data about how you are using our website and the equipment you are using too. This information is collected by using cookies (see cookie policy below).

We may also receive data about you from third party sources. This may include analytical data from providers such as Google, Facebook and Twitter.

Financial and Transactional data is also collected from the various financial institutions we contact on your behalf. This is to fulfil our contract with you and allow us to complete our service.

What we do with the information we gather

We only use your personal data for legitimate and lawful reasons. Our main reasons for use of your personal data is;

- Discuss the potential of entering into a contract after an enquiry from you
- To perform a contract entered
- There is a legal or regulatory requirement to do so
- It is necessary as a legitimate interest and your interests or fundamental rights do not override those interests

We will rely on the following types of lawful basis to process your personal data

1. **Performance of Contract** – The processing of your data is necessary to perform the contract entered into by you and us. Or we are making contact to discuss the possibility of entering into the contract.
2. **Compliance of a legal or regulatory obligation** – Where we may need to process your data in order to comply with a legal or regulatory obligation we are subject to. This may include, but not limited to disclosures to our regulators, as part of legal or court proceedings.
3. **Legitimate Interest** – We may process your data in the interest of JPS Financial in managing and conducting our business to enable us to give the best service possible to our clients. In doing so, we will make sure we consider

any impact on you and your rights before we process your data. We will not process your data if the impact on you overrides our interest.

Purposes for which we will use your data

- We will use your data to contact you to discuss your query relating to our services. This allows us to discuss the potential for entering into a contract for services and register you as a new client with JPS Financial Ltd.
- To deliver relevant marketing materials relating to your query with us. This may be but not limited to email, telephone, SMS, or post.
- The data will be processed and sent to your banking institutions to obtain the required information to fulfil our contract with you.

Who will my data be shared with

| Third Party | What data is shared | Why is it shared |
|---|--|---|
| Printing Company | Name, Addresses, Postcode, Lenders, Date of Birth, Contact numbers | From time to time we may look to outsource printing of correspondence |
| Banking institutions, Brokers, Financial Ombudsman | Name, Addresses, Postcode, Lenders, Date of Birth, Contact numbers, Account and Policy Numbers, Complaint details | To allow us to fulfil our element of the contract between us. |
| Legal Ombudsman | Name, Addresses, Postcode, Lenders, Date of Birth, Contact numbers, Account and Policy Numbers, Complaint details, Correspondence between parties | To process any complaints and to allow a resolution |
| Logicclaim (CRM) | All details of client file | To allow us to fulfil our element of the contract between us and process claim |
| Zoho (CRM) | Name, Addresses, Postcode, Lenders, Date of Birth, Contact numbers | To allow us to process enquiries before we look to enter into a contract |

| | | |
|------------------------------|--|---|
| JPS Walker Solicitors | All detail of the client file Name, Addresses, Postcode, contact numbers, email address | In the event of legal action to enforce contract Referrals of work |
|------------------------------|--|---|

Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Data Retention

We will only look to retain your personal data for as long as is necessary, for the purpose it was collected for, including satisfying any legal, accounting or reporting requirement. After which we may destroy your data without further notification to you.

Different types of personal data will require different data retention periods. For example, an initial enquiry about our services will not be retained for as long as a client file, after the conclusion of our contract. Specific data retention periods can be obtained by contacting our Data Protection Officer on the contact details above.

Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

You have the right to:

- Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal 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. You also have the right to ask us to delete or remove your

personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. 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.

- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us on the details above. You will not have to pay a fee to obtain any of your personal data. Once your request has been received we will respond to you within 30 days. Where possible, we will try to respond to you sooner. However, there may be circumstances where the request may take longer. If this is likely to happen we will be in touch to advise.

Personal information

We will not sell personal information to third parties unless we have your permission or are required by law to do so. If you have opted to do so we may use your personal information to send you promotional information about third parties which we think you may find interesting if you tell us that you wish this to happen.

You may request details of personal information which we hold about you under the General Data Protection Rules. If you would like a copy of the information held on you please write to FAO Data Protection Officer, JPS Financial, 8 Trumpet Street, Manchester, M1 5LW or Email FAO of the Data Protection Officer to info@jpsfinancial.co.uk

If you believe that any information we are holding on you is incorrect or incomplete, please write to or email us as soon as possible, at the above address. We will promptly correct any information found to be incorrect. You

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

How we use cookies

The JPS Financial Ltd website uses cookies to store some user preferences. These do not allow us to identify you specifically. No personal data about you is gathered using cookies. When you visit the website, you will be told about cookies. If you want to disable cookies, they can be turned off in your browser and some functionality may be lost.

We use a number of different cookies on our site. If you do not know what cookies are, or how to control or delete them, then we recommend you visit <http://www.aboutcookies.org/> for detailed guidance.

What Cookies are used

Category 1

Strictly necessary: to fit this category, the cookie must be "related to a service provided on the website that has been explicitly requested by the user". Obvious cases include access to protected areas. The Firm also includes cookies which remember previously entered text so it is not lost if the page refreshes.

Category 2

Performance based: Includes analytics, advertising and Pay Per Click cookies in this category – provided they only store anonymous data and cannot therefore be used for behavioural targeting of ads.

Examples of relevant cookies used include: Google Analytics, Facebook, Instagram.

Third Party Cookies

In common with most websites, JPS Financial uses cookies to capture certain information about our site's use.

We use analytic cookies to understand how our site is being used. This measures the number of visitors and tells us how they navigate the site.

Also, if you use one of the share buttons on the website, a cookie may be set by the service you have chosen to share content through.

JPS Financial does not control the dissemination of these cookies and this tool will not block cookies from those websites. You should check the relevant third party website for more information about these.