

## OUR PRIVACY POLICY

Your privacy is very important to us and with the introduction of the New General Data Protection Regulations (GDPR) in May 2018, we continue to update our privacy policies in readiness for GDPR implementation. Our current policy helps you understand how we process personal information for the provision of our Claims Management Service. We are committed to conducting our business in accordance with these principles to ensure that the confidentiality of personal information is protected and maintained. This policy tells you:

What personal information we collect about you

How the information we collect is used

Who we may share your personal information with

Your choices regarding the collection, use and distribution of your information

About our security

Who to complain to if you are unhappy.

It is entirely up to you to decide whether you want to provide us with your personal information. If you choose not to, it is unlikely that we will be able to assist you.

### **Contact**

You may contact us if you have any questions about our Privacy Notice or practices at [enquiries@abc-inc.co.uk](mailto:enquiries@abc-inc.co.uk) or at our mailing address below:

ABC Inc Limited York House

Smisby Road

Ashby-de-la-zouch Leicestershire LE65 2UG

Tel: 08081263130

### **Changes to our Privacy Notice**

ABC Inc Limited reserves the right to change this privacy policy as we may deem necessary from time to time or as may be required by law. Any changes will be immediately posted on the Website and you are deemed to have accepted the terms of the privacy policy on your first use of the Website following the alterations. This privacy policy will be updated to be GDPR Compliant on or around 25<sup>th</sup> May 2018.

### **Customer Information We Hold**

ABC Inc Limited provide a claims services for people who may have been mis-sold a financial product or service. The Customer Data the we collect may include your name, address, contact number, IP address, date of birth, banking provider, bank account information, advisor details, email address and other information that may include information about your health or your personal finances however; this list may not include all the information we may require to provide our service/s. If you contact us other than via our website, we may keep a record of that

correspondence. We collect Customer Data by lawful and fair means with the knowledge and consent of the individual.

If you decide to use our claims service, you will be provided with our terms and conditions of service, details of our complaints procedure and how to cancel our service. You will also be able to access details of any regulator applicable to the service(s) we provide as we work within a regulated industry.

We collect and process personal information from you at various stages to respond to your enquiries, to ensure that content from our site is presented in the most effective manner for you and for your computer, to notify you of changes to our websites, to provide you with specific advice, and to carry out our obligations in respect of any contract you enter into with us.

To provide our service we may also collect and receive the following information:

a) Complaint Information relating to the nature of a complaint or claim such as a lender,

investment company, insurer, administrator

b) Billing and other information. Customer payment information for processing the

collection of a fee along with a billing address retained securely only until the appropriate payment of the fee has been made.

c) Whenever you visit our website we may obtain your IP address, device information,

location information, however, precise GPS location from mobile devices is not collected.

The information we ask for will be relevant to the service(s) provided or the enquiry. Where possible the information will be accurate, complete and up to date.

### **How we use Your Information**

We use your information to provide a claims service and to improve our services. The information we collect about you is used solely for the purposes for which it was provided. The information you provide will be shared with our employees to provide a mis-sold financial product service. We only share your information with banks, lenders and regulatory bodies such as the Financial Ombudsman Service, Financial Services Compensation Scheme and with our regulator. In the event that our re-assignment terms are implemented, in accordance with our agreement your data will be shared with the assignee who will become a joint data controller. We will also share your data when we are legally obliged to do so, such as for fraud prevention purposes

We will only use your data for additional purposes such as marketing where we have received specific consent to do so and, from May 2018 you will only be contacted where you have specifically opted in to be contacted and only on products and services you have specifically agreed to be contacted about.

We may access and use Customer Data as reasonably necessary and in accordance with your instructions, to manage our claims service, security and any technical issues. We will also use your data at your request on customer support matters, when required by law and as provided by our agreement with you. This includes:

a) Communicating with you by responding to your queries or requests.

b) Sending Service and Administrative emails and messages to inform you about changes in

our Services, our Service offerings, and important Service related notices, such as security and fraud notices. These emails and messages are considered part of the Services and you may not opt-out of them.

c) Communicating with you about billing, invoicing, account management

## **Your Rights**

You provide us with details of what we 'can do' with your Data and have the right to opt-in and importantly to opt-out by either unsubscribing or asking to opt out. You can be specific about how we can and cannot use your data which means if you have told us that you do not want us to share your data with any third party then we will not. We put you in charge and, you have the following rights:

- To know that your data is being processed.
- To access your personal data subject to a fee of £10.00\*
- To data portability and to have your information corrected if inaccurate (Including ensuring any third party puts right any inaccuracy).
- To request that your data be erased, restrict processing, object to processing and;
- To rights relating to automated decision making and profiling.

Of the data, we process outside of any contract, from May 2018 will retain the data for no longer than 12 months. When a data subject contracts with us to provide a mis-sold claims service, the data is retained within secure electronic archives as required by law but for no longer than 6 years after the conclusion of the service provided. Where reasonably practicable data is minimised so not to be identifiable to the data subject unless required by law or is subject to a Subject Access Request.

\*SAR fee not applicable after 25<sup>th</sup> May 2018

## **Links and Security**

ABC Inc Limited takes security seriously to protect the information you provide to us from loss, misuse, and unauthorized access or disclosure considering the sensitivity of the information we collect, process and store, and the technology resources available. We have put in place suitable physical, electronic and managerial procedures to safeguard and secure Data collected via this Website.

This privacy notice does not cover the links within this site linking to other websites. We encourage you to read the privacy statements on the other websites you visit.

## **General**

You may not transfer any of your rights under this privacy policy to any other person. We may transfer our rights under this privacy policy where we reasonably believe your rights will not be affected. If any court or competent authority finds that any provision of this privacy policy (or part of any provision) is invalid, illegal or unenforceable, that provision or part-provision will, to the extent required, be deemed to be deleted, and the validity and enforceability of the other provisions of this privacy policy will not be affected.

Unless otherwise agreed, no delay, act or omission by a party in exercising any right or remedy will be deemed a waiver of that, or any other, right or remedy.

This Agreement will be governed by and interpreted according to the law of England and Wales. All disputes arising under the Agreement will be subject to the exclusive jurisdiction of the English and Welsh courts.

## **Complaints**

You have the right to complain to ABC Inc Limited by writing to us or emailing us using the details below. In the event of a complaint or breach relating to any aspect of our Data Protection our

records will be made available to the relevant supervisory authority. If you have a complaint about the service our complaints procedure is available through a link in the footer of our website.

If you have any queries about your information, how we may be using your information, or your rights contact us at [enquiries@abc-inc.co.uk](mailto:enquiries@abc-inc.co.uk)

If you have made a complaint about any aspect of how your data has been processed and, you are still unhappy you have the right to complain to the Information Commissioner details can be found at [www.ico.org.uk](http://www.ico.org.uk)