



## **PRIVACY POLICY**

**This privacy policy applies between you the User of this website and Seefeld Securities Limited trading as Taylor Blakeley. Taylor Blakeley is the owner and provider of this website. Taylor Blakeley is a claims management company.**

**Taylor Blakeley takes the privacy of your information very seriously.**

For the purposes of data protection legislation, we are the data controller, and we will process your personal data in accordance with the UK General Data Protection Regulations (and national laws which relate to the processing of personal data. As a controller of personal data, Taylor Blakeley is registered with the Information Commissioner (ICO): ICO Number - **TBC**

Taylor Blakeley uses the following terms throughout the policy "we", "us", & "our".

### **WHAT IS THE PURPOSE OF THIS PRIVACY NOTICE?**

This Privacy Policy sets out how 'We', use and protect any information that the 'You', the user, provides to 'Us', throughout this website and our service.

Where we ask you to provide certain information by which 'you' can be identified (i.e. Personal Data) after providing this information, then this information shall only be used in accordance with this Privacy Policy.

This website has not been designed for use by children. We do not knowingly collect data relating to children.

### **WHO IS THE DATA CONTROLLER?**

We are the (Data) Controller and are responsible for your personal information.

We are **not** required to appoint a Data Protection Officer (DPO) due to the amount of data that we process. If you have any questions relating to this privacy notice, including any requests to exercise your legal rights please use the below contact information.

### **Our contact details:**

**Taylor Blakeley**

Postal Address: **1<sup>st</sup> Floor, 16-18 Lloyd St, Altrincham, WA14 2DE**

Telephone Number: **0800 999 0 999**

Email: [Info@taylorblakeley.co.uk](mailto:Info@taylorblakeley.co.uk)

Website: [www.taylorblakeley.co.uk](http://www.taylorblakeley.co.uk)

## WHAT DATA IS COLLECTED

Personal Data or Personal Information can be defined as “Any information about an individual from which that person can be identified” This does not include data where the identity has been anonymised.

Under GDPR we will only collect information that is specified, explicit and legitimate for the purposes required. This means the data we collect must be adequate, relevant and limited to the requirements of the service.

We may collect, use, store and transfer different kinds of personal information about you. These are detailed as possible,

- **Identity Data:** First name, last name, marital status, date of birth.
- **Contact Data:** Current address, previous addresses and postcodes, email address (es) and telephone number.
- **Transaction Data:** Information about your Unaffordability claim, Name of Bank/Building Society, Account Number, Sort Code, Duration and Value of your Overdraft
- **Technical Data:** Internet Protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating systems and platform and other technology on devices you use to access the website
- **Profile Data:** Includes, understanding the services you’ve engaged, your interests, preferences, feedback and analysing the data you have provided as part of the service to improve our services, customer relationships and experiences.
- **Usage Data:** Information about how you use our website.

## HOW WE COLLECT DATA

We collect data in the following ways:

1. Data is given to us by you when you use our services, for example when you contact us through our website, by email, by telephone or through any other means
2. Data is collected automatically - We automatically collect some information about your visit to the Website. This information helps us to make improvements to Website content and navigation, and includes your IP address, the date, times and frequency with which you access the Website and the way you use and interact with its content.

## PURPOSES AND LAWFUL BASIS FOR PROCESSING PERSONAL DATA

As the controller of customer personal data there are a variety of purposes for which us as the control processes personal data. The following details below sets this out:

Purposes for processing personal data	Type of Data	Lawful basis for processing
To contact you following the submission of an enquiry	(a) Identity (b) Contact	Consent – Performance of a contract with you
To identify whether a customer may have a potential financial claim	(a) Identity (b) Contact (c) Transaction	Consent – Performance of a contract with you

	(d) Technical (e) Profile (f) Usage	Explicit Consent (health data e.g. Vulnerable Customers)
To process a financial claim on the customer's behalf which may include any of the following: i) Share or obtain information with third parties such as Bank(s) or Building Society (ies), the Financial Ombudsman	(a) Identity (b) Contact (c) Transaction (d) Technical (e) Profile	Consent – Performance of Contract with you
To share any sensitive information with third parties such as your Bank/Building Society so that these parties are aware of such and can support a customer with sensitive needs and have consideration for any specific needs or requirements to adapt their service delivery	(a) Identity (b) Contact	Consent  Explicit Consent (health data)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or Privacy Policy	(a) Identity (b) Contact (c) Profile	Performance of Contract with you  Necessary to comply with a Legal obligation  Necessary for our legitimate interests
Asking you to leave a review or take a customer satisfaction survey.  To publish feedback/testimonials provided by you regarding the satisfaction of our services	(a) Identity (b) Contact (c) Profile	Consent
To respond to any data subject access requests that we may receive from you	(a) Identity (b) Contact	Legal Obligation
Monitoring and Oversight such as recording and monitoring telephone call and communication to ensure compliance with regulatory obligations and rules and to ensure firm processes for quality and training purposes.	(a) Identity (b) Contact	Legal Obligation
To administer and protect our business and this website (including trouble shooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Technical (b) Usage	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a

		business reorganisation or group restructuring exercise)
Notifying you about changes to our Terms of Business or Privacy Policy	Legal Obligation	

## SPECIAL CATEGORIES OF PERSONAL DATA

If we identify that you have characteristics of vulnerability, we may collect data relating to your health to ensure we can tailor and adjust our service to your needs and circumstances. We will obtain your consent to obtain and store this data for the sole purpose of delivering our service.

We do not collect any other Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your genetic and biometric data unless you ask us specifically to note these categories). We do not collect any information about criminal convictions and offences.

### **If you do not provide Personal Data?**

Where we need to collect personal data by law, or in order to establish if a claim exists, we may not be able to identify if you have an affordability claim regarding your Overdraft and as such will not be able to continue with the service.

## DISCLOSURE OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table above. Selected third parties will be subject to obligations to process your personal information in compliance with the same safeguards that we deploy.

We may need to disclose your information to any one of the following:

- Third party service providers, for example: Telecommunications, IT systems etc acting as processors based in the United Kingdom who we engage to deliver our services (e.g. host our dialler system, electronic storing of your personal data).
- HM Revenue & Customs, Regulators (Financial Conduct Authority, Office of Communication, Information Commissioner's Office), and other authorities acting as processors based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Lawton Hathaway Limited FRN697865, Po Box 900, Altrincham, Cheshire, WA15 5NZ. Lawton Hathaway are our nominated fee recovery party whom we work with should you fail to pay our success fee in a timely manner.
- Accountants, Compliance Consultants and other like services acting as processors based in the United Kingdom who require the reporting of processing activities in certain legal and compliance circumstances.
- Third parties to whom we may transfer or merge parts of our business or assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change in these circumstances occurs, your personal data will be used in the same way as set out within this Privacy Policy.

Please note we will never knowingly allow third-party service providers to use your personal data for their own purposes and only permit them to process your data for specified purposes and in accordance with our strict instruction, of which is contractually in place.

## INTERNATIONAL TRANSFERS

We do not transfer your personal data outside the European Economic Area (EEA).

## WEBSITE LINKS

Our website may, from time to time, contain links to and from the websites of third parties. Please note that if you follow a link to any of these websites, such websites will apply different terms to the collection and privacy of your personal data, and we do not accept any responsibility or liability for these policies. When you leave our website, we encourage you to read the privacy notice/policy of every website you visit.

## DATA SECURITY

We are committed to ensuring your information is safe and secure. In order to prevent unauthorised access or disclosure, we have developed, implemented and maintained suitable physical, electronic and managerial procedures to safeguard and secure the information collected online. We wish for our customers to be completely confident in using our services, therefore we regularly review our processes and procedures to protect your personal information from unauthorised access, use, accidental loss, destruction or disclosure.

## DATA RETENTION

### How long will we hold your personal data?

We will only retain your personal data for as long as is necessary to fulfil our obligations under the provision of our service as well as any purposes necessary to satisfy any legal, accounting or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk, of harm of unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, including applicable legal requirements. ***We will retain call recordings and email correspondence for at least 12 months from our last point of contact with you.***

In some circumstances you can ask us to delete your data under the 'Right to Request Erasure' However, an erasure request may be partially declined. In the event a complaint has been made, coupled with an erasure request, we will maintain records relating to the complaint, including basic information such as name, and telephone number. In the event that you do not wish to be contacted by us, we are required to maintain a log of this request, withholding applicable data to ensure we no longer contact you further.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## YOUR LEGAL RIGHTS

In accordance with GDPR, you, in your capacity as a consumer and as a citizen, are entitled to a range of specific rights as the Data Subject that you may exercise under particular conditions, with a few exceptions.

### Your Right to ACCESS

The right of access, commonly referred to as subject access, gives individuals the right to obtain a copy of their personal data as well as other supplementary information. It helps you to understand how and why we are using your data, and to check we are using it lawfully.

<b>Your right to RECTIFICATION</b>	You have the right to have inaccurate personal data rectified. You may also be able to have incomplete personal data completed – although this will depend on the purposes for the processing. This may involve providing a supplementary statement to the incomplete data.
<b>Your right to ERASURE</b>	Under certain circumstances you have the right to have personal data erased. Also known as ‘The right to be forgotten’. The right is not absolute.
<b>Your right to RESTRICT PROCESSING</b>	Under certain circumstances you have the right to request the restriction or suppression of your personal data, and as like the right to erasure, it is not absolute. Restriction of processing means we are permitted to store your personal data; we are unable to use it.
<b>Your right to DATA PORTABILITY</b>	You have the right to obtain and reuse your personal data for your own purposes across different services. This eases the copying or transferring of personal data easily from one IT environment to another, safely and securely, without affecting the usability of the data.
<b>Your right to OBJECT</b>	Under certain circumstances you have the right to object to the processing of your personal data, however you do have the absolute right to object to direct marketing.
<b>Your right to be INFORMED</b>	You have the right to be informed about the collection and use of your personal data. Your right to be informed forms part of this policy, and provides the purposes for processing your data, our retention periods and who it will be shared with.

## **DATA SUBJECT ACCESS REQUESTS (DSAR)**

You have the right to access to your personal information. Also known as a Data Subject Access Request (DSAR). This means you are entitled to obtain the following information about yourself:

- Confirmation that we are processing your personal data;
- A copy of your personal data; and
- Other supplementary information;

A third party may make a request on your behalf. We will require evidence from the third party as to evidence this entitlement. This may take the form of a written authority or be a more general power of attorney.

## **HOW DO WE PROVIDE YOU WITH THE DATA YOU HAVE REQUESTED?**

If you make a request electronically (via electronic means), we will provide the information in a commonly used electronic format unless you have specified otherwise. Please note, we may extend the time to respond by a further two months if the request is complex or you have made multiple requests. As you have the right to be informed, we will always ensure you are notified within one month of receiving the request, accompanied by an explanation.

## **HOW LONG DO WE HAVE TO COMPLY WITH A REQUEST?**

We **must** act on your subject access request without undue delay and at the latest within one month of receipt. This is calculated as beginning from the day following receipt of the request until the corresponding calendar date the following month. We may request your identity to satisfy the request, however this will be proportionate to the request itself and if we have doubts of the authenticity of identification.

## **WILL IT COST YOU ANYTHING?**

For the vast majority of requests, we cannot charge you a fee. Where the request is manifestly unfounded or excessive, we may charge a reasonable fee to cover the administrative costs of complying with the request. This also applies in the event that you request further additional copies of data following your initial request. This will again be charged as an administrative cost.

## **YOUR RIGHT TO COMPLAIN TO THE SUPERVISORY AUTHORITY (ICO)**

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](http://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.

## **CHANGES TO THIS PRIVACY POLICY**

This Privacy Policy was last updated on 15 October 2024. Any changes to this Privacy Policy will be made here and updated accordingly.