

# PRIVACY POLICY

LAST MODIFIED: 18th January 2023 (Version 2.0)

## About us

We, "ClaimingMadeEasy", a trading name of Approved Claims Group Ltd, is committed to safeguarding the privacy of our prospective Clients (Prospects) and our Clients; this policy sets out how we will treat your personal information. We are a Data Controller, which means that we determine the purposes and the means of processing your personal information. We are registered directly with the Information Commissioner's Office (ICO) and our registration number is ZA758940.

## The data subject (You)

For the purpose of data processing we will refer to you as either a Prospect, or a Client depending on your relationship with Approved Claims Group Ltd. For ease, we have split this policy into three sections:

- Prospect: this section is relevant to any potential Clients who have not entered into an Agreement with Approved Claims Group Ltd by signing our Claim Documents.
- Client: this section is relevant once you have entered into an Agreement with Approved Claims Group Ltd by signing our Claim Documents. This includes where you provide your signature electronically.
- Everyone: this section is relevant to all individuals who engage with us, including both Prospects and Clients. Throughout the policy, we refer to your personal information as your data. The Claim Documents you sign will depend on the specific service you engage us for and may include a Letter of Authority, Agreement to Proceed, Claim Form, other type of document or a combination thereof.

## Prospects

### Why we require your data

When you provide your data to us, you consent for us to use your personal information to;

- Contact you about offering our services via the contact methods you have provided, which could include telephone, text message (SMS), messaging platforms such as WhatsApp, email and/or post; and
- Administer our website, including ensuring that we can enable your use of the services on our website (including enquiries and complaints about our website) and improve your browsing experience by personalising the website.

Further information about how we will use your data can be found in the "Everyone" section of this Privacy Policy.

## The data we require

To process your enquiry, we require that you provide your full name, date of birth, telephone number, email address and postal address. Depending on the service you are enquiring about, we may also require additional information to help us substantiate your claim(s), such as a National Insurance number. Upon receipt of your data we will attempt to contact you using the contact methods you have provided.

If you do not wish to provide the personal details we require, unfortunately, we will be unable to offer some or all of our services to you.

## Data retention

We will keep your contact details following an enquiry for a maximum period of three years. During this period, we will contact you using the contact details you have provided to offer you our services as per your initial enquiry. Contact will be made using the contact methods you have provided which could include;

- Telephone, text message (SMS), messaging platforms such as WhatsApp, email; and
- Post

We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information. We will store all the personal information you provide on our secure servers that are subject to strict security requirements.

## Withdrawing your consent

You can withdraw your consent for us to contact you by telephone, text message (SMS), messaging platforms such as WhatsApp, email and/or post at any time. You can withdraw consent verbally via telephone or in writing via email or post using the contact details at the end of this policy. Additionally, every electronic communication we send to you will contain an option to opt out.

## Clients

### Why we require your data

During the provision of our services, you agree for us to process your personal information through signing our Claim Documents to allow us to;

- Submit information requests and/or Data Subject Access Requests to relevant third parties to obtain information about the financial product(s) you held/hold to establish if you are eligible to make a claim(s);
- Submit claims to HMRC with your instruction;

- Provide you with updates via telephone, text message (SMS), messaging platforms such as WhatsApp, email and post where such contact details have been provided; and
- Send statements and invoices to you and collect payments from you.

Further information about how we will use your data can be found under the “Everyone” section of this Privacy Policy.

#### Data retention

Once you have entered into a contract with us, we will keep your personal data for up to seven years following the conclusion of our contract with you.

The retention of your data enables us to provide our services to you and fulfil our legal obligations including our accounting requirements.

We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.

We will store all the personal information you provide on our secure servers that are subject to strict security requirements.

#### Updating your contact preferences

You can opt-out of contact by telephone, text message (SMS), messaging platforms such as WhatsApp and/or email at any time. Whilst you have an active Agreement with us, you are unable to withdraw consent for postal communications, as we require this method of contact to fulfil our contractual and regulatory obligations.

You can update your contact preferences verbally via telephone or in writing via email or post using the contact details at the end of this policy.

#### Everyone

##### What information do we collect?

We collect, store and use the following kinds of information;

- Website use - we will record information about your computer and about your visits to and use of our website, including your IP address, geographical location, browser type, referral source, length of visit and page views;
- Personal information - for example, your name, date of birth, address details and contact information;
- Special or sensitive information - data protection law defines some personal information as 'sensitive' for example information about your physical health. It may sometimes be necessary to collect this information to help us provide you with a better service however, we will only collect and process this type of information with your consent;
- Financial information - to investigate any potential Tax Refund claim(s) relating to tax deductions made from compensation payments you received from financial organisations, which could include the type of product (i.e.: a loan or credit card), the start and end date of the product, transactional information or account statements;
- Employment and Tax information - to investigate any potential Tax Refund claim(s) we may require information about your current employment, employment history and information about your tax status.
- Information to help us to better understand you and provide you with information about other services which may be suitable and relevant - for example, information about how you interact with electronic communications we send, such as email, text message (SMS) and messaging platforms such as WhatsApp; and
- Information about other people - if you provide personal information about someone else, for example when a Marriage Allowance claim is made, you must do so with the permission of the other person. The personal information about the other person will be used in the ways as described in this policy.

##### How do we collect your personal information

- When you make an enquiry to us by telephone, by email, on our website, via social media, through a third party or by any other means;
- Where you instruct another third party to refer a potential claim(s) to us;
- When you provide information directly to us once you have entered into an Agreement with us by telephone, by email, on our website or by any other means;
- From a third party(ies) with your instruction, for example where you have signed our Claim Documents instructing us to make an information request or Data Access Request to a third party(ies) for the purposes of substantiating your claim(s)
- Where a third party, such as a financial organisation, HMRC or the Court provides information in response to a claim(s);
- From identity checking services, and credit reference agencies;
- we may be required by law to verify your identity and address(es) and to do so, we may undertake an electronic check. This process involves searches with credit reference agencies, fraud prevention agencies and the electoral register. The agencies will record the details of the search, but the electronic check will have no effect on your credit rating;
- where we require information about your financial product(s) to progress your claim(s) we may obtain this from an information service or credit reference agency. The information we will request will be limited to specific information about the financial products you hold/held, such as the date(s) you opened and closed an account. As part of our request we will provide the information service or credit reference agency with your name, date of birth and contact information. The information service or credit reference agency will use this information to assist them with identity verification and prevention of fraud/money laundering.
- When you add reviews to a review platform or interact with us using social media
- When we may need to obtain up to date information about you to meet our contractual or legal obligations for example, we may use a tracing agent to find up to date contact information for you if we require your Instruction(s) to progress your claim(s) or are attempting to collect unpaid Fees; and

- Any other instance where you have given permission for your information to be provided to us.

#### How we use your data

##### To provide our services to you

- Contacting you to see how we can help if you have expressed an interest in our services, but have not signed our Claim Documents;
- Passing your personal information to financial institutions and HMRC to progress your claim(s);
- Helping you identify additional claims through undertaking “soft” searches through credit and information services;
- Responding to any enquiries that you make via email, post, or social media; and
- Storing your personal information and using it to populate fields on our websites to make it easier for you to utilise our services in the future;

##### What is our legal basis for processing?

- Performance of a contract;
- Consent; or
- Legitimate Interests

##### To market to you

- Contacting you about products and services which we think may be of interest to you, for example, by email, text message (SMS), messaging platforms such as WhatsApp, post, or social media; and
- Inviting you to take part in and manage consumer surveys, reviews, and other market research activities.

Should you no longer wish to receive information about similar products and services, you can withdraw your consent for or object to receiving marketing communications from us and we will stop processing your data for marketing purposes. You can object verbally via telephone or in writing via email or post using the contact details at the end of this policy.

##### What is our legal basis for processing?

- Consent; or
- Legitimate Interests

##### To personalise your journey with us

- Using your personal information to form a view on what services you may be interested in and tailor our marketing communications to you;

This is called profiling. We believe we have a legitimate interest to do this and that it does not harm your rights over your information. However, if you do not want us to use your personal information in this way, you have a right to object to this and can let us know using the contact details at the end of this policy.

##### What is our legal basis for processing?

- Legitimate interests

#### Other uses

- Internal Analysis: we may use your personal data to assess our performance as a business and for statistical analysis, as part of our legitimate interest to develop our business and our products; and
- Sale, or re-structuring: we may share your data with potential buyers of some or all of our business during a sale, or re-structuring and may rely on legitimate interests to transfer ownership of your files with us to a third party.

##### What is our legal basis for processing?

- Legitimate interests

#### Legal requirements

We may be required to use your data due to a legal requirement which is placed upon us; this includes our regulatory requirements such as financial record keeping, staff training and monitoring, in addition to complaint handling. We will always inform you if this is the case.

##### What is our legal basis for processing?

- Legal Obligation

#### Who do we share your personal information with?

To facilitate your claim(s) and provide our services to you, we need to communicate your personal data to other individuals or organisations. Your personal data will always be processed in strict confidence and we will take all reasonable steps to ensure that any third party has adequate security measures in place.

- Progressing your claim(s): to progress your claim(s) we may be required to provide your data to named financial institutions and HMRC. Additionally, our work for you may require us to disclose information to other third parties to assist us in the investigation and progress of your claim(s) such as credit reference agencies;
- Communicating with you: we may use third party firms which provide omnichannel communication software to help us manage and send some of our email and text message (SMS) communications and/or communications on messaging platforms such as WhatsApp. We may also use an outsourced print house based in the United Kingdom to print and post letters that we send to you;
- Systems and IT: we use third party firms which support the running of our business through providing essential data storage, software and other IT services;

- Administrative support: we may outsource some elements of your claim(s) such as the processing of documentation relevant to your claim(s) and the conduct and receipt of telephone calls to specialist supervised companies based outside the United Kingdom;
- Credit and Information Services: We may share information with and use information from information services and credit reference agencies based in the United Kingdom to:
  - ensure the information we hold about you is correct and up to date and to verify your identity and address in line with our obligations under the Money Laundering Regulations 2017; and to perform a “soft” credit check with the credit reference agency, where this is relevant to the service we are providing to you. For example, a “soft” credit check could be used to help us identify additional financial products you hold and may be eligible to make a claim(s) in respect of. “Soft” checks are visible to you on your credit report but do not show up to other organisations in the same way as a “hard” check and have no impact on your credit rating. We will always notify you prior to performing a “soft” check on your credit report
- Collecting our Fee(s): where you have a Fee(s) that is due to us under our Agreement but remains unpaid despite efforts on our part to recover the funds due, we may pass your personal data to third parties that support with debt management, including potential purchasers of any outstanding debt;
- Meeting our obligations: we use United Kingdom based professional legal, consultancy and accountancy services to help us fulfil our regulatory and legal obligations. In certain circumstances we may be required to provide your data to the HMRC, or other relevant body, for example the credit reference agencies, fraud prevention agencies, the Information Commissioner's Office or a law enforcement body; and
- Other third parties: we may share your data with other third parties where we believe we have a legitimate interest to do so, such as tracing agents, review platforms, market researchers, or potential buyers of some or all of our business during a sale, or re-structuring. If you request for us to stop processing your data, we will also communicate this to the relevant third parties if they are processing this on our behalf. If you have any concerns about the above third parties, please let us know and we can provide advice and support to help you manage your data preferences.

### Third party companies

In addition to the third party individuals and organisations that we use to provide our service to you, your information is also shared with:

- Approved Claims Group Ltd for the purpose of providing you with legal services. They will contact you by telephone, post, email, and SMS. They will be the data controller.

### Legitimate interests

We may use your personal data for purposes outside of our contractual services where we believe that it is in our legitimate interest to do so. When we rely on our legitimate interest, we make sure we consider and balance any potential impact on you and your rights before we process your personal data.

Our legitimate interests are:

- To service our clients' needs and deliver services
- to promote and market our products and services
- to understand prospects and clients including their patterns, behaviours as well as their likes and dislikes; and
- to test and develop new products and services as well as improve existing ones.

One example of this is where we rely on legitimate interests to process your personal data for marketing purposes, which is outlined in more detail later in this policy. Other examples include:

- Reviews and research: we may contact you to ask you to provide a review about the services which you have received or where we are carrying out market research which may help us design future products and services or to help improve our current services;
- Internal Analysis: we may use your personal data to assess our performance as a business and for statistical analysis, as part of our legitimate interest to develop our business and our products. We may also share this information with third parties who provide us with services and where we have a contractual obligation to do so; or
- Sale or re-structuring: we may share your data with potential buyers of some or all of our business during a sale or re-structuring and may rely on legitimate interests to transfer ownership of your file(s) with us including any ongoing claim(s) to a third party.

### Automated decision making and profiling

As highlighted earlier in our Privacy Policy, we use profiling to personalise your experience with us and to allow us to better meet your needs.

Automated decision making refers to a decision which is taken solely on the basis of automated processing of your personal data. This means processing using, for example, software code or an algorithm, which does not require human intervention.

As profiling uses automated processing, it is sometimes connected with automated decision making. Not all profiling results in automated decision making, but it can do.

We only want to contact you about services that will benefit you. To support this may rely on automated decision making as part of our marketing strategy and some of the communications we send to you may be prompted by automated decision making.

You have the right to object to us profiling you for marketing purposes, or using automated decision making. You can object using the contact details at the end of this policy. Where we receive an objection from you, we will stop processing your personal information in this way within one month and confirm this to you.

## Your data rights

You remain in control of your personal data and have rights over your data, we summarise some of these rights below. You can make a request to exercise your rights using reasonable means, including by telephone, post or email. If you make the request by email, we will provide any response or information in a commonly used electronic format unless you instruct us otherwise. Where you make a request to exercise one of your rights, we will action this within one month. However, should the request be complex we can extend this by a further two months. We will inform you of this in this event.

- Accessing Your Personal Data

You have the right to request from us a copy of the personal data that we may hold about you. This is often called a 'Data Subject Access Request'. We will provide this free of charge. However, if you make a repeat request, we may charge an administrative fee of £10. Before providing this information to you or to another person or company where you have requested this personal data to be sent to, we may ask for proof of identity or ask sufficient questions to enable us to locate the information and ensure that we are only providing it where you have given your agreement.

- Correcting Your Personal Data

If the personal information we hold about you is incorrect, or incomplete you have the right to request that we correct this.

- Stopping, or Limiting the Processing Of Your Personal Data

You may request that we stop processing your data, for a specific purpose or any purpose if you believe we are no longer entitled to process it. There may be occasions where we are unable to stop processing your personal data and we will discuss this with you when responding to your request.

- Deleting Your Personal Data

If you believe that we no longer have any reason to process or hold your data, you may request that we delete this. There may be occasions where we are unable to delete your personal data due to contractual, legal or regulatory obligations. We will, however, discuss this with you when responding to your request.

- Transferring Your Personal Data

You can request your data in a commonly used electronic format, and for us to transfer this to another entity or person, where we are processing your data with your consent or in accordance with a contract. This will only apply to information which is processed by automated means (i.e. by a computer).

## Legal requirements

We may be required to use your data due to a legal requirement which is placed upon us; this includes our regulatory requirements such as financial record keeping, staff training and monitoring, in addition to complaint handling. In these circumstances, we may be required to keep your data by law. We will always inform you if this is the case.

## International data transfers

We will only share your personal information outside the United Kingdom (UK) where we have your consent, to comply with a legal duty, or where we work with a third-party service provider to enable us to provide you with our services, and they are based in or process information outside of the UK. If we do share your information outside of the UK, we will make sure that it is protected in the same way as if it was being used within the UK. This includes through ensuring that the transfer is covered by an appropriate safeguard or that the European Commission has made an 'adequacy decision' in respect of the country's data protection measures. Although we are no longer part of the European Union (EU) the UK Government has recognised European Commission adequacy decisions made before the end of the transition period, meaning we are able to continue to transfer data to the European Economic Area (EEA) and other countries with a European Commission adequacy decision in confidence, knowing that the appropriate safeguards are in place to ensure personal data is kept safe. More information on this can be found on the European Commission Justice website or the Information Commissioner's Office website.

In addition, some of the third-party service providers we use may be based outside of the UK or EEA and/or may provide services which mean your data is transferred outside of the EEA.

In any case, we will ensure that there are appropriate security measures in place such as technical security, including encryption and restricted access to your data. We have strict contracts in place to make sure your data is kept safe. If you have any questions, please contact us.

## Cookies

### What are cookies?

We use cookies, as do most website providers, to help maintain website functionality and to manage your preferences. A cookie is a small text file that a website saves on your web browser or mobile browser when you visit a website. It enables the website to remember your actions and preferences (such as login, language selection, font size and other display preferences) over a period of time, so you do not have to keep re-entering them whenever you come back to the site or browse from one page to another.

Cookies are a widely used form of technology and most, if not all, websites will set cookies.

Cookies may be used for various purposes, including:

- User preferences, including language
- Authentication: to identify the user once logged in, for the duration of a session
- Analytics: to provide information about website use and user profile
- Targeting adverts

## How do we use cookies?

We may use both “session” cookies and “persistent” cookies on the website. We will use the session cookies to keep track of you whilst you navigate the website. We will use the persistent cookies to enable our website to recognise you when you visit.

Session cookies will be deleted from your computer when you close your browser. Persistent cookies will remain stored on your computer until deleted, or until they reach a specified expiry date.

We also use cookies to remember your device so we can deliver more relevant advertising to you. This means that the cookie remembers you have visited our site and will show you advertising which is relevant to you.

We use a mix of cookies. Some of these are set by our website, to manage your preferences.

We also use third party cookies. This includes Google Analytics, who gather all of your information on an anonymised basis. This allows us to make sure our website is the best it can be. Most third party cookies are on an anonymised basis, which means these organisations are not collecting any information that can be used to identify you.

We also integrate with social media providers, to help you to connect your account to our website and also to display advertising content which is relevant to you. These cookies use your personal data to deliver advertising which is relevant to your interests.

This is an overview of our cookie use which you can review to decide how best to manage your online privacy

- Functional Cookies - these are always enabled as they are required for basic website maintenance. We cannot stop these from being set on your browser, but you can manage your preferences through your browser itself

- Performance Cookies - These cookies allow us to improve the site's functionality by analysing usage of our website on an anonymised basis. In some cases these cookies improve the speed with which we can process your request or allow us to remember site preferences you have selected. Deselecting these cookies may result in poorly- tailored recommendations and slow site performance

- Social Media and Advertising Cookies - Social media cookies offer the possibility to connect you to your social networks and share content from our website through social media. Advertising cookies (of third parties) collect information to help better tailor advertising to your interests, both within and beyond our websites. This means the cookie will allow you to show you adverts relating to your interests. De-selecting these cookies may result in seeing advertisements that are not as relevant to you or you not being able to link effectively with Facebook, Twitter, or other social networks and/or not allowing you to share content on social media.

You can control and/or delete cookies as you wish - for details, see [www.aboutcookies.org](http://www.aboutcookies.org). You can delete all cookies that are already on your computer and you can set most browsers to prevent them from being placed. If you do this, however, you may have to manually adjust some preferences every time you visit a site and some services and functionalities may not work.

You can easily accept or reject the cookies on this site by using the options available on our cookie banner.

## Third party websites

Our website may contain links to other websites. We are not responsible for the privacy policies or practices of third-party websites.

## Policy amendments

We may update this privacy Policy from time-to-time by posting a new version on our website. You should check this page occasionally to ensure you are happy with any changes.

## Contact us

If you have any questions about this policy or our treatment of your personal data, please contact us:

- By email at [support@claimingmadeeasy.com](mailto:support@claimingmadeeasy.com)
- By post to Approved Claims Group Ltd, 20-22 Wenlock Road, London N1 7GU

Where provided electronically, a paper copy of this policy can be made available upon request.

## Complaints

If you are not happy with how we process your personal information, you should contact us using the contact details provided above, to make a complaint. You also have the right to make a complaint to the Information Commissioner's Office (ICO) if you are unhappy with how we have used your personal information, for example, if we were to refuse to comply with a data rights request. We would however, prefer that you direct any complaints us in the first instance to we may attempt to resolve your concerns. You can find details of how to make a complaint to the ICO on their website, at <https://ico.org.uk/make-a-complaint/>

## ICO's address

Information Commissioner's Office Wycliffe House,  
Water Lane,  
Wilmslow,  
Cheshire, SK9 5AF

## Helpline Number

0303 123 1113