

# Privacy Policy

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*Last Updated: December 2025*

## 1. Introduction

Rowan Rose Solicitors (trading as Rowan Rose Ltd) is committed to protecting your privacy and personal data. This Privacy Policy explains how we collect, use, store, and protect your information when you use our services or interact with us.

### **Data Controller:**

Rowan Rose Ltd

Company Registration Number: 12916452

Registered Office: 1.03 Boat Shed, 12 Exchange Quay, Salford, M5 3EQ

SRA Number: 8000843

Email: [contact@rowanrose.co.uk](mailto:contact@rowanrose.co.uk)

Phone: 0161 505 0150

## 2. Information We Collect

We collect and process the following types of personal data:

### **2.1 Personal Information**

- Full name
- Contact details (email address, phone number, postal address)
- Date of birth
- National Insurance number (where required)
- Employment status and income details
- Bank account details (for compensation payments)

### **2.2 Financial Information**

- Credit card/loan account numbers

- Credit agreements and statements
- Income and expenditure details
- Bank statements
- Debt information
- Financial hardship evidence

## 2.3 Claim-Specific Information

- Details of your claim (housing disrepair, irresponsible lending, etc.)
- Supporting documentation (photos, correspondence, medical records)
- Landlord or lender details
- Communication history regarding your claim

## 2.4 Technical and Marketing Data

- IP address and device information
- Website usage data (cookies, browsing behavior)
- Facebook/Meta advertising identifiers
- WhatsApp/Messenger conversation data
- Communication preferences
- Marketing engagement metrics

# 3. How We Collect Your Information

We collect information through:

- **Direct interactions:** When you contact us, submit a claim form, or speak with our team
- **Online forms:** Website contact forms, chatbots, and online applications
- **Social media:** Facebook Messenger, WhatsApp Business conversations
- **Automated technologies:** Cookies, chatbots powered by AI, CRM systems
- **Third parties:** Credit reference agencies, lenders, landlords, legal representatives
- **Data Subject Access Requests:** Information obtained from creditors/landlords on your behalf

# 4. How We Use Your Information

We use your personal data for the following purposes:

<b>Purpose</b>	<b>Legal Basis</b>
Processing your claim and providing legal services	Contract performance / Legitimate interests
Communicating with you about your case	Contract performance
Submitting claims to third parties (lenders, landlords)	Contract performance / Legitimate interests
Assessing eligibility for claims	Legitimate interests
Marketing our services to you	Consent / Legitimate interests
Improving our services and website	Legitimate interests
Compliance with legal and regulatory obligations	Legal obligation
Fraud prevention and security	Legitimate interests

## 5. Who We Share Your Information With

We may share your personal data with the following third parties:

### 5.1 Essential Service Providers

- **Lenders and creditors:** Vanquis Bank, 118 Money, and other financial institutions (for submitting claims)
- **Landlords and housing associations:** For housing disrepair claims
- **Legal representatives:** Barristers, expert witnesses, court services
- **Financial Ombudsman Service:** If your claim is escalated

### 5.2 Technology and Marketing Providers

- **Meta/Facebook:** For advertising, lead generation, and Messenger communications
- **WhatsApp Business API:** For automated client communications
- **Twilio:** SMS and messaging services
- **n8n (automation platform):** For workflow automation and CRM integration
- **OpenAI / Anthropic:** AI-powered chatbot services
- **CRM providers:** For client relationship management
- **Email service providers:** For communications and marketing
- **Web hosting providers:** For website operation

### 5.3 Professional and Regulatory Bodies

- Solicitors Regulation Authority (SRA)
- Professional indemnity insurers
- Legal regulators and courts

### 5.4 Other Third Parties

- Payment processors for handling compensation payments
- Credit reference agencies (where necessary)
- Law enforcement or government agencies (where legally required)

**Important:** All third parties are required to maintain the security and confidentiality of your data in accordance with UK GDPR and data protection laws.

## 6. International Data Transfers

Some of our service providers may be located outside the UK/EEA, including:

- **Meta/Facebook:** USA (Meta Platforms Inc.)
- **OpenAI:** USA
- **Anthropic:** USA
- **Cloud storage providers:** May use servers in multiple jurisdictions

Where we transfer data internationally, we ensure appropriate safeguards are in place, such as:

- EU Standard Contractual Clauses
- UK International Data Transfer Agreement (IDTA)
- Adequacy decisions from the UK Government

## 7. Automated Decision-Making and AI

We use automated technologies and artificial intelligence in the following ways:

- **Chatbots:** AI-powered chatbots (using OpenAI/Anthropic) conduct initial eligibility assessments and gather information
- **Lead scoring:** Automated systems assess the strength of potential claims
- **Communication automation:** Automated follow-up messages via WhatsApp/Email

**Your rights:** You have the right to request human intervention in automated decisions that significantly affect you. No automated decision will be made regarding your claim without human review.

## 8. How Long We Keep Your Data

We retain your personal data for the following periods:

Data Type	Retention Period
Active claim files	Duration of claim + 7 years (legal requirement)
Completed claim files	7 years from claim conclusion

Unsuccessful/abandoned claims	3 years from last contact
Marketing data (with consent)	Until consent withdrawn + 2 years
Website analytics and cookies	Up to 2 years
Financial records	7 years (legal/tax requirement)

## 9. Your Data Protection Rights

Under UK GDPR, you have the following rights:

### 9.1 Right of Access

You can request a copy of the personal data we hold about you (Subject Access Request).

### 9.2 Right to Rectification

You can ask us to correct inaccurate or incomplete data.

### 9.3 Right to Erasure ("Right to be Forgotten")

You can request deletion of your data in certain circumstances (subject to legal retention requirements).

### 9.4 Right to Restrict Processing

You can ask us to limit how we use your data in certain situations.

### 9.5 Right to Data Portability

You can request your data in a machine-readable format.

## **9.6 Right to Object**

You can object to processing based on legitimate interests or for direct marketing purposes.

## **9.7 Rights Related to Automated Decision-Making**

You can request human intervention in automated decisions.

## **9.8 Right to Withdraw Consent**

Where we process data based on consent, you can withdraw it at any time.

**To exercise any of these rights, contact us:**

Email: [contact@rowanrose.co.uk](mailto:contact@rowanrose.co.uk)

Phone: 0161 505 0150

Post: Data Protection Officer, Rowan Rose Ltd, 1.03 Boat Shed, 12 Exchange Quay, Salford, M5 3EQ

## **10. Marketing Communications**

We may send you marketing communications about our services if:

- You have given us consent to do so, OR
- You are an existing client and we are marketing similar services (soft opt-in)

You can opt out of marketing at any time by:

- Clicking "unsubscribe" in any marketing email
- Replying "STOP" to SMS messages
- Contacting us directly
- Updating your preferences in your account settings

## **11. Cookies and Tracking Technologies**

Our website uses cookies and similar technologies to:

- Enable website functionality
- Analyze website traffic and user behavior

- Deliver targeted advertising via Facebook/Meta
- Remember your preferences

#### Cookie types we use:

- **Essential cookies:** Required for website operation
- **Analytics cookies:** Help us understand how visitors use our site
- **Marketing cookies:** Facebook Pixel and similar tracking for advertising
- **Functionality cookies:** Remember your preferences and settings

You can manage cookie preferences through your browser settings or our cookie consent tool.

## 12. Security Measures

We implement appropriate technical and organizational measures to protect your data, including:

- Encryption of data in transit and at rest
- Secure access controls and authentication
- Regular security assessments and updates
- Staff training on data protection
- Secure disposal of physical and digital records
- Regular backups with encryption

## 13. Data Breaches

In the unlikely event of a data breach that poses a risk to your rights and freedoms, we will:

- Notify the Information Commissioner's Office (ICO) within 72 hours
- Inform affected individuals without undue delay
- Take immediate steps to contain and remedy the breach

## 14. Third-Party Links

Our website may contain links to third-party websites. We are not responsible for the privacy practices of these external sites. Please review their privacy policies before providing any personal information.

## 15. Children's Privacy

Our services are not directed at children under 18. We do not knowingly collect personal data from minors. If you believe we have inadvertently collected such data, please contact us immediately.

## 16. Changes to This Privacy Policy

We may update this Privacy Policy from time to time. Any changes will be posted on this page with an updated "Last Updated" date. Significant changes will be communicated to you via email or prominent website notice.

## 17. Complaints

If you have concerns about how we handle your personal data, please contact us first. If you are not satisfied with our response, you have the right to lodge a complaint with:

### Information Commissioner's Office (ICO)

Website: [www.ico.org.uk](http://www.ico.org.uk)

Helpline: 0303 123 1113

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

## 18. SRA Regulation

As a firm regulated by the Solicitors Regulation Authority (SRA Number: 8000843), we comply with the SRA Standards and Regulations, including specific requirements regarding confidentiality and data protection.

You can view the SRA Standards and Regulations at: [www.sra.org.uk/solicitors](http://www.sra.org.uk/solicitors)

## 19. Contact Us

If you have any questions about this Privacy Policy or how we handle your personal data, please contact us:

### Rowan Rose Solicitors

1.03 Boat Shed, 12 Exchange Quay, Salford, M5 3EQ

Email: [contact@rowanrose.co.uk](mailto:contact@rowanrose.co.uk)

Phone: 0161 505 0150

Office Hours: Monday - Friday, 9:00 AM - 5:00 PM

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