

PRIVACY | POLICY

Welcome to the ME Legal and Financial Limited's privacy notice. By 'Mortgage Claims' we refer to 'ME Legal and Financial Limited'. 'Mortgage Claims' is a trading name of ME Legal and Financial Ltd. Mortgage Claims respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

PURPOSE OF THIS PRIVACY NOTICE

This privacy notice is intended to provide you with information on how ME Legal and Financial Limited collects and processes your personal data through your use of this website, including any data you may provide through this website when you sign up for our service.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

1. CONTROLLER

ME Legal and Financial Ltd is the controller and is responsible for your personal data.

We have appointed a data protection manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights (as explained in section 9) please contact the Data Protection Manager using the details set out below.

CONTACT DETAILS

Full name of legal entity: ME Legal and Financial Limited

Name of Data Protection Manager: Evie Gregory

Email address: dataprotection@mortgage.claims

Postal address: ME Legal and Financial Limited

The Lakehouse Lakeside, Cheadle Royal Business Park, Cheadle, England, SK8 3AX

Telephone number: 01625 568 761

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.

CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

This version was last updated on 8th August 2019 and historic versions can be obtained by contacting us via the details above. This Privacy Policy may be subject to change and you should check this page from time to time to ensure you are happy with the changes.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

SOCIAL MEDIA

Communication, engagement and actions taken through external social media platforms that this website and its owners participate on are custom to the terms and conditions as well as the privacy policies held with each social media platform respectively.

Users are advised to use social media platforms wisely and communicate/engage upon them with due care and caution in regard to their own privacy and personal details. This website nor its owners will ever ask for personal or sensitive information through social media platforms and encourage users wishing to discuss sensitive details to contact them through primary communication channels such as by telephone or email.

This website uses social sharing buttons which help share web content directly from web pages to the social media platform in question. Users are advised before using such social sharing buttons that they do so at their own discretion and note that the social media platform may track and save your request to share a web page respectively through your social media platform account.

SHORTENED LINKS IN SOCIAL MEDIA

This website and its owners through their social media platform accounts may share web links to relevant web pages. Users are advised to take caution and good judgement before clicking any shortened URLs published on social media platforms by this website and its owners. Despite the best efforts to ensure only genuine URLs are published many social media platforms are prone to spam and hacking and therefore this website and its owners cannot be held liable for any damages or implications caused by visiting any shortened links.

2. THE DATA WE COLLECT ABOUT YOU

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. These have been detailed as follows:

- **Identity Data** includes, first name, maiden name, last name, marital status, title, date of birth and gender.
- **Contact Data** includes, current and previous addresses, email address and telephone numbers.
- **Financial Data** includes, lender details and mortgage account history for the purposes of your potential mis-selling and/or breach claim.
- **Claims Related Data** includes, information provided by yourself for the purposes of investigating your mis-selling and/or breach claim.
- **Transaction Data** includes, details of products and services you have engaged us for.
- **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, products and services.
- **Marketing and Communications Data** includes, your preferences in receiving marketing/communications from us and our third parties and your communication preferences.

Profiling Data

We collect, use and share your personal data within our group for the purpose of 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, marketing, customer relationships and experiences. We share your data with the following company only, for the for the purposes explained:

- ME Data Limited
- Registered Number: 11378990
- Registered Address: The Lakehouse Lakeside, Cheadle Royal Business Park, Cheadle, England, SK8 3AX

Aggregated Data

We 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.

Special Categories of Personal Data

If we identify that you are a vulnerable customer, 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). Nor do we 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 under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to provide our service to you. In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - engage our products or services;
 - request marketing to be sent to you; or
 - give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our cookies policy.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties as set out below:
 - Technical Data from analytics providers such as Google based outside the EU;
 - Identity and Contact Data from data brokers based inside the EU. These complete native marketing which directs consumers to our website.
 - Identity and Contact Data from publicly available sources such as Companies House, Electoral Register and Credit Checks based inside the EU.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where you have provided clear consent for us to process your personal data for a specific purpose.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new client	(a) Identity (b) Contact	(a) Consent
To process and deliver our service to you including: (a) investigating your claim (b) making requests to financial institutions or other dispute resolution service providers on your behalf (c) making an introduction to a solicitor to process your claim	(a) Identity (b) Contact (c) Financial (d) Claims Related (e) Marketing and Communications	(a) Consent
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a customer satisfaction survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Necessary to comply with a legal obligation (b) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) 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) (b) Necessary to comply with a legal obligation

To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	(a) Consent (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	(a) Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	(a) Consent (b) Necessary for our legitimate interests (to develop our products/services and grow our business)

MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have an array of different products and services we can offer you or other companies in our group can offer you. All contact will be made by ourselves and in line with your contact preferences and will be initiated when you have provided us with specific consent to do so.

We may rely upon legitimate interest to make suggestions and recommendations to you about goods or services that may be of interest to you. We will make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

You can ask us to stop sending you marketing messages by Contacting us at any time to amend your preferences, methods of contact and products/services you wish to hear about.

PROMOTIONAL OFFERS FROM US

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and, in each case, you have not opted out of receiving that marketing.

THIRD-PARTY MARKETING

We will get your express opt-in consent before we share your personal data with any company outside the ME Legal and Financial Limited's group of companies for marketing purposes.

OPTING OUT

You can ask us to stop sending you marketing messages by contacting us at any time. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service engaged.

COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or non-functional. For more information about the cookies we use, please see our cookies policy.

CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please Contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

In the event ME Legal and Financial ceases to trade, an orderly wind down procedure would ensue. In this instance and as part of our service to you, we will transfer your personal information to Quanta Law Limited who are one of our panel law firms who will be able to continue processing your claim without any disruption caused to you. Prior to this transfer taking place, we will notify you of this and you will be able to opt out of this processing. However, if you would like to opt out of this transfer now, please contact us using the details provided below and we will action your request with immediate effect.

Email: dataprotection@mortgage.claims

5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with third party data processors for the purposes set out in the table in paragraph 4 above. These companies will not use your information to contact you. Selected third parties will be subject to obligations to process your personal information in compliance with the same safeguards that we deploy.

The below provides information on the types of firms we may share your data with and the reasons for data processing. You can contact us at any time if you would like further information on the below.

Type of Firm	Processing Activity
Postal Service Providers	To help provide our service to you we will share data with these firms for the purpose of sending you correspondence.
Data Storage and Confidential Waste Providers	As part of our service to you, we are required to provide secure data storage and confidential waste facilities as part of our data security measures.
Communication Platform Providers	Provider of internal systems to facilitate electronic contact, e.g. telephone, email, text message and other messaging applications.
Customer Identification Services	To enable us to provide our service to you and undertake our assessment services, we utilise anti-money laundering and identification checking services.
Printing Service Providers	To help provide our service to you, we use specialist printing providers for customer correspondence.
Data back-up Services	As part of delivering our service to you, we are required to ensure the security of your personal data. We achieve this through the use of back-up service providers.
LegalTech Service Providers	To complete our mortgage assessments and undertake a comprehensive analysis we utilise specialist technology.

We may also disclose your information with:

- HM Revenue & Customs, Regulators and other authorities acting as processors based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Accountants, Solicitors, Compliance Consultants and other like services acting as processors, based in the United Kingdom who require reporting of processing activities in certain legal and compliance circumstances.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS

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

7. DATA SECURITY

We, ME Legal and Financial Limited, endeavour to maintain the highest standard of data privacy and security to protect your personal details and other information concerning your account. We want our customers to feel completely confident in using our services, therefore we regularly review our processes and procedures to protect your personal information from unauthorised access and use, accidental loss and/or destruction.

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.

8. DATA RETENTION

HOW LONG WILL YOU HOLD MY PERSONAL DATA FOR?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying 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 from 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, and the applicable legal requirements.

We operate a 2 step process for collecting your personal data. Step 1 is the first screen of our enquiry form which asks you to complete your name, email address and telephone number. Step 2 is where you are asked to provide further details to enable us to assess if you are eligible for our services. Details of retention periods for different aspects of your personal data are shown overleaf.

Description of data collected and services provided	How we will retain your data
You have started to engage with our services via our website at www.mortgage.claims and have entered only your name, email address and telephone number (Step 1)	We will contact you by SMS, E-mail or telephone over a 30-day period to determine whether you would like to proceed with our services. After 30-days your personal data will be permanently erased from our systems.
You have provided your details to determine whether you may be eligible but do not qualify for our mortgage assessment services (Step 2).	We will retain your personal details for a period of 30-days. After 30-days your personal data will be anonymised and archived in line with our data security and retention procedures.
You have provided your details but have <u>not</u> completed a Letter of Authority; or You have specified that you do not wish to engage with our services.	Your data will be anonymised and archived after 12 months from the date of collecting your data, in line with our data security and retention procedures.
You have provided your details and have completed a Letter of Authority to enable us to investigate your potential claim but you have instructed us not to continue.	Your data will be anonymised and archived after 12 months from our last contact with you in line with our data security and retention procedures.
You have provided your details and have completed a Letter of Authority to enable us to investigate your potential claim and this has been concluded, either through referral to a law firm or we have advised you that we can no longer proceed.	We will retain your data for a period of 15 years following last contact with us.

Where you have chosen to opt-in for future services, we will retain the data supplied to us in order to contact you about these services. By law we have to keep certain information about our customers and this data will be held solely and securely for those legal purposes.

In some circumstances you can ask us to delete your data: see request erasure within Section 9 below for further information. 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.

9. 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. Where consent is withdrawn once we have started to progress your case, we will retain your data for limited processing purposes in line with our regulatory and legal obligations and data retention policy. Where consent has been withdrawn, you will no longer receive any further communication from us.

If you wish to exercise any of the rights set out above, please Contact us at dataprotection@mortgage.claims

NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances. We may also charge a further administrative fee when you request for us to provide further copies of the information already provided to you.

We want to make sure that your personal information is accurate and up to date. You may ask us to correct or remove information you think is inaccurate. We will respond to your request within one month of receiving your request. We will inform you of the third parties to whom your data has been disclosed.

WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Mortgage.Claims is a trading name of ME Legal and Financial Limited. ME Legal and Financial Limited is authorised and regulated by the Financial Conduct Authority (FCA) for regulated claims management services. Our temporary permission firm reference number is: 829976. Registered in England and Wales with registered number: 08328211. Registered Offices: ME Group, B26 Alderley Park, Congleton Road, Nether Alderley, Macclesfield, SK10 4UN.