

1. GENERAL

Harrington Jones Limited is Authorised and regulated by the Financial Conduct Authority in respect of regulated Claims Management Activity FRN: 834856 Registered with the Information Commissioners Office, registration number: 012369

Registered Address: Harrington Jones Limited, Suite 7 Harbour View, The Albany, South Esplanade, St Peter Port, GUERNSEY, GY1 1AQ. Company Number: 53781, (“we” “us” “our”) are committed to protecting and respecting your privacy.

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 which relate to the processing of personal data. As a controller of personal data, Harrington Jones is registered with the Information Commissioners Office (ICO), our ICO registration is: Z3258019.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

Our Contact Details

By Mail: to Harrington Jones Limited, Suite 7 Harbour View, The Albany, South Esplanade, St Peter Port, GUERNSEY, GY1 1AQ

Email: info@harringtonjones.com

2. CATAGORIES OF PERSONAL DATA WE COLLECT FROM YOU

2.1 We may collect and process personal data about you in the following circumstances:

2.1.1 When you complete forms on our website, we collect personal information including your name, telephone number(s), email address, home address, and details of your enquiry. This information is provided when you request that we contact you in relation to our services.

2.1.2 If you are making a claim for mis-sold motor finance then Harrington Jones will perform a soft credit search with Experian, Equifax and/or TransUnion. You consent to us sharing your Title, Name, Date of Birth and Addresses with Valifi Ltd (<https://www.valifi.co.uk/privacy-policy>), Valid8 IP Ltd (www.valid8.com/privacy-policy), and/or Checkboard Limited (<https://checkboard.com/privacy-policy>), for the purposes of obtaining your credit reporting and verifying your eligibility to claim. If you'd like to understand how the credit reference agencies use and share personal data (including the legitimate interests they pursue) please read the Credit Reference Agency Information Notice (CRAIN)

Equifax: <https://www.equifax.co.uk/crain/>

Transunion: <http://www.transunion.co.uk/crain>

Experian: <https://www.experian.co.uk/legal/crain/>

2.1.3 details of your visits to our website including, but not limited to, traffic data, location data, weblogs and other communication data, and the resources that you access (see section 2.2.2 on cookies below); and

2.1.4 whenever you disclose your information to us, or we collect information from you in any other way, through our website.

2.2 We may also collect data in the following ways:

IP address

2.2.1 We may collect information about your device, including, where available, your Internet Protocol (IP) address, for fraud prevention purposes. We may also collect details about your device's operating system and browser type for system administration and to compile aggregated data for reporting to our advertisers. This information is statistical in nature and relates to users' browsing actions and patterns; it does not identify any individual.

Cookies

2.2.2 Cookies

Our website uses cookies to distinguish you from other users. This helps us to provide you with a better experience when you browse our website and also allows us to improve its functionality. You can manage or disable cookies through your browser settings.

Legitimate Interests

2.3 Legitimate Interests

We may process your personal data for our legitimate interests, including to:

2.3.1 provide you with information or services you have requested from us;

2.3.2 enable you to participate in interactive features of our website, where you choose to do so;

2.3.3 ensure that content on our website is presented in the most effective manner for you and your device;

2.3.4 improve our website and services; and

2.3.5 process and respond to any complaints or enquiries you make.

PURPOSES AND LAWFUL BASIS FOR PROCESSING PERSONAL DATA

3 As the controller of customer and prospective 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	Lawful basis
To contact you following the submission of an enquiry regarding a mis sold vehicle finance claim.	Depending on the data that is captured within the online submission form we may rely on Consent and Explicit Consent e.g. health data
To identify whether a potential claimant may have a vehicle finance claim	Legitimate Interest (necessary for us to provide the requested service to you Explicit Consent (health data)
To undertake a soft credit check undertaken by Experian Ltd.	Consent
To recommend to you an appropriate law firm for claims investigation and representation where it has been identified that you may have a potential claim for a mis sold vehicle finance claim	Consent Explicit Consent (health data)
To share any vulnerability/sensitive information with third parties such as a law firm that this party are aware of such and can support sensitive customers who those customers with characteristics of vulnerability and have consideration for any specific needs or requirements to adapt their service delivery	Consent Explicit Consent (health data)
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	Consent
To respond to any data subject access requests that we may receive from you	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.	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)	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) Legal Obligation
Notifying you about changes to our terms or privacy policy	Legal Obligation

4 Website links

Our website may, from time to time, contain links to and from third-party websites. Please note that if you follow a link to any of these websites, they will have their own terms and privacy policies governing the collection and use of your personal data, and we do not accept any responsibility or liability for these policies. We highly recommend you review the terms and privacy notice or policy of every website you visit.

5. THIRD PARTIES

5.1 Third-Party Customer Service Providers. We may appoint third-party organisations to handle customer service enquiries on our behalf.

5.2 The information processed for this purpose may include your name, contact details, any relevant reference numbers, and the reason for your enquiry. These providers will use this information solely to assist in responding to your enquiry, and we will use your personal data to deliver our services to you. We currently engage CMCI Limited for this purpose. CMCI Limited does not retain or store customer data; all information, including call recordings, is securely retained by Harrington Jones Ltd.

5.3 In order to provide you with any legal services requested to run claims, we will need to share personal data with third parties such as our panel solicitor who are Alawco Limited, registered in England and Wales with registration number 13197985, authorised and regulated by the Solicitors Regulation Authority (SRA ID 818725), Benson Goldstein, a trading name of Benson Goldstein Ltd (company number 14417365), authorised and regulated by the Solicitors Regulation Authority (SRA No. 8003245) and Locksley Law Solicitors, a trading name of RH Law Limited, Company Number 11444626, authorised and regulated by the Solicitors Regulation Authority (SRA No. 659355).

Where you inform us of anything that will affect how our service delivery should be provided to you we will ask you if we can make a note of this on our records and if we can share this information with any relevant third party.

Under the UK General Data Protection Regulations, personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data, health data, or data concerning a natural person's sex life or sexual orientation is considered Special category data. Where you tell/inform us of anything that is considered to be Special Category data we will obtain explicit consent to note this on our records and for us to share this information with any relevant third party.

5.4 To help us provide the best level of service to you, we may instruct third parties to conduct customer experience surveys on our behalf.

5.5 We may also advertise your feedback on our website and marketing materials (subject to obtaining your prior consent);

6. IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the and you fail to provide the data when requested, we will be unable to provide you with our services. In this case, we may have to cancel a service/arrangement you have with us but we will notify you if this is the case at the time.

7. MARKETING

7.1 In addition to the uses described in sections 2-5 above, where you indicate, you would like to receive marketing correspondence from us, subscribe to our marketing lists or newsletters or provide us with your details at events, we may use your personal data for our legitimate interests in order to provide you with details about our services which we think may be of interest.

7.2 You have the right to opt-out of receiving the information detailed in sections 9 at any time. To opt-out of receiving such information you can:

7.3.1 click the unsubscribe button contained in any such communication received; or

7.3.2 email us at info@harringtonjones.com providing us with your name and contact details.

7.4 Where you have subscribed to receive marketing correspondence from us, we will only contact you up to two years from when you provide us with your consent.

8. MONITORING AND RECORDING

We may monitor and record communications with you (such as telephone communications and emails) for the purposes of quality assurance, training, fraud prevention and compliance. In accordance with relevant regulatory rules, we are required in relation to regulated claims management activities to keep personal data including online enquiries, telephone communications and emails for at least 12 months after our last date of contact with you. For all other services we keep call recordings and emails for as long as necessary.

We also have CCTV cameras installed in our premises for the purpose of crime prevention and for health and safety reasons.

9 DISCLOSURE OF PERSONAL DATA TO THIRD PARTIES

9.1 In addition to the third parties mentioned above, we may disclose your information to the following third parties for our legitimate interests as follows:

9.1.1 staff members, in order to facilitate the provision of goods or services to you;

9.1.2 our affiliated entities, to support internal administration;

9.1.3 IT software providers that host our website and store data on our behalf;

9.1.4 professional advisers including consultants, lawyers, bankers and insurers who provide us with consultancy, banking, legal, insurance and accounting services;

9.1.5 Regulators and other authorities who require reporting of processing activities in certain circumstances; and

9.1.6 third parties who we may choose to sell, transfer or merge parts of our business or assets. Alternatively, we may seek to acquire other business 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 policy.

9.1.7 We may disclose personal data to the police, regulatory bodies, legal advisors or similar third parties where we are under a legal duty to disclose or share personal data in order to comply with any legal obligation, or in order to enforce or apply our website terms and conditions and other agreements; or to protect our rights, property, or safety of our customers, or others. This includes

exchanging information with other companies and organisations for the purposes of fraud protection.

9.1.8 We will not sell or distribute personal data to other organisations without your approval.

10. DATA SECURITY

10.1 Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your information transmitted to our website; any transmission is at your own risk.

10.2 Information you provide to us is shared on our secure servers. We have implemented appropriate physical, technical and organisational measures designed to secure your information against accidental loss and unauthorised access, use, alteration or disclosure. In addition, we limit access to personal data to those employees, agents, contractors and other third parties that have a legitimate business need for such access.

11 YOUR LEGAL RIGHTS

In accordance with GDPR, you, in your capacity as a consumer and citizen you 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.
Your right to RECTIFICATION	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.
Your right to ERASURE	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.
Your right to RESTRICT PROCESSING	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.
Your right to DATA PORTABILITY	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.

Your right to OBJECT	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.
Your right to be INFORMED	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.

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

12 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 their personal data;
- A copy of their personal data; and
- Other supplementary information;

A third party may make a request on your behalf. This will often involve a solicitor acting 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.

13. CHANGES TO OUR PRIVACY POLICY

We reserve the right to update this privacy policy at any time, and any changes we make to our privacy policy will be posted on this page. We encourage you to check this privacy policy from time to time for any updates or changes to this privacy policy. If we would like to use your previously collected personal data for different purposes than those we notified you about at the time of collection, we will provide you with notice and, where required by law, seek your consent, before using your personal data for a new or unrelated purpose. We may process your personal without your knowledge or consent where required by applicable law or regulation.

This policy was last updated on 04 May 2026.

14. CONTACT US

We have appointed a Data Protection Lead to oversee compliance with this privacy policy. If you have any questions, comments or requests regarding this policy or how we use your personal data please contact our Data Protection Lead at info@harringtonjones.com. This is in addition to your right to contact the Information Commissioners Office if you are unsatisfied with our response to any issues you raise at <https://ico.org.uk/global/contact-us/>