

Harrington Jones Privacy Policy

v1.7

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At Harrington Jones we are committed to maintaining the accuracy, confidentiality, and security of your personal data. This Privacy Policy describes the personal data that Harrington Jones collects from or about you, how we use and to whom we may disclose that information.

Privacy Policy

It is our policy to comply with applicable data protection and privacy legislation in Guernsey, including the Data Protection (Bailiwick of Guernsey) Law, 2017. Harrington Jones Limited is registered with the appropriate supervisory authority in Guernsey. This Privacy Policy applies to the processing of personal data carried out by Harrington Jones Limited in accordance with this law.

This Privacy Policy applies only in certain circumstances and may not confer rights or obligations in all jurisdictions or to all individuals. If you are unsure whether or how this Privacy Policy applies to you, please contact our Data Protection Manager for guidance.

1. What is Personal Data?

Personal data, or personal information, means any information that relates to an identifiable individual. It does not include data where the identity has been removed (anonymous data).

2. What Personal Data do we Collect?

We may collect, use, store and transfer different types of personal data in respect of the individuals with whom we interact. This includes:

- **Contact and Identity Data:** contact and identification information, such as your first name, last name, date of birth, marital status, gender, address, telephone number and e-mail address.

- **Transaction Data:** product and service-related information concerning the products and services that we provide to, or receive from, you.
- **Financial Data:** credit and financial information, such as your bank account and payment card details, employment details and history, income sources, pay frequency and pay dates, assets, liabilities, credit history and payment preferences.
- **Business Data:** business relationship information, including information related to your agreements, preferences, advisors, and decision-makers, feed-back and information requested by or provided to you.
- **Technical Data:** information related to your visit to our website, including the IP address and domain used to access our website, the type and version of your browser, the website you came from to access our website, the page you entered and exited at, any website page that is viewed by that IP address and what country you are from.
- **Profile Data:** including your username, password, purchases or orders you make, requests for offers of credit, preferences, and feedback.
- **Usage Data:** information about how you use the website products and services.
- **Marketing and Communications Data:** your preferences in receiving marketing from Harrington Jones and third parties and your communication preferences.

In addition, we may collect your personal data in connection with the financial-related services that you may seek from us, including for example, having us suggest the credit cards, loans and other financial products that, based on (i) our experience and (ii) the information you provide to us, will most likely accept you.

We may also collect market-related information, which may include personal data, concerning market trends and activities impacting our business. This information may include contract terms, financial information, and other information for the purpose of market analysis and strategic planning. We may also collect information related to our media, investor and public relations activities and information related to our interactions with financial and other analysts and advisors.

Where permitted or required by applicable law or regulatory requirements, we may collect information about you without your knowledge or consent.

We do not collect any 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 health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

3. How do we Collect your Personal Data?

You can visit our website without telling us who you are or revealing any information about yourself, including your e-mail address.

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

- Direct interactions. You may give us your Contact and Identity Data, Financial Data and Transaction Data by corresponding with us or submitting this to our website by:
 - using the “contact us” or “partner with us” portion of this website;
 - by corresponding with a representative of Harrington Jones via e-mail using the hyperlinks created for that purpose;
 - applying for our products or services;
 - creating an account on our website;
 - requesting marketing to be sent to you; or
 - entering a competition, promotion or survey.
- Automated technologies or interactions. As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this data by using cookies and other similar technologies. Please see our cookie policy for further details.

- Third parties or publicly available sources. From time to time, we may utilise the services of third parties in our business and may also receive personal data collected by those third parties in the course of the performance of their services for us or otherwise. Where this is the case, we will take reasonable steps to ensure that such third parties have represented to us that they have the right to disclose your personal data to us.

4. If you fail to 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 perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). 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.

5. Our Website and Cookies

When you visit the website, we place a “cookie” on the hard drive of your computer to track your visit. A cookie is a small data file that is transferred to your hard drive through your web browser that can only be read by the website that placed the cookie on your hard drive. The cookie acts as an identification card and allows our website to identify you and to record your passwords and preferences. The cookie allows us to track your visit to the website so that we can better understand your use of our website so that we can customise and tailor the website to better meet your needs.

Most web browsers are set to accept cookies. However, on most web browsers you may change this setting to have your web browser either: (1) notify you prior to a website placing a cookie on your hard drive so that you can decide whether or not to accept the cookie; or (2) automatically prevent the placing of a cookie on your hard drive. It should be noted that if cookies are not accepted, you may not be able to access a number of web pages found on the website.

6. What about Third Party Websites?

Our website may contain links to other websites that may be subject to less stringent privacy standards. We cannot assume any responsibility for the privacy practices, policies or actions of the third parties that operate these websites. Harrington Jones is not responsible for how such third parties collect, use, or disclose your personal data. You should review the privacy policies of these websites before providing them with personal data.

7. How Do 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 we need to perform the contract, we are about to enter or have entered into with you.
- 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 obligation.
- For the purpose of eligibility assessment and service provision we may provide your personal information to third parties including Valifi and to run soft credit searches with credit reference agencies, including Equifax and TransUnion. This search will not impact your credit score and will be recorded only as a soft search on your credit file. We will assess the information provided in your credit report to determine whether you may have a potentially eligible claim, but we will not share the details of your credit report with any third parties.

<https://www.valifi.co.uk/privacy-policy>

<https://www.equifax.co.uk/privacy-hub/ein>

<https://www.transunion.co.uk/legal/privacy-centre>

If you require the list of companies to whom we passed your personal data too, please contact us, we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Lawful bases

Legitimate interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We 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 obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of a contract means processing your personal data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

Purposes for which we will use Your Personal Data

We have set out below, in a table format, 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. We have also identified what our legitimate interests are where appropriate.

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 process your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Contact and Identity (b) Financial(c) Transaction(d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To establish, maintain and manage our relationship with you which will include: (a) Registering you as a new customer (b) Notifying you about changes to our terms or privacy policy (c) Asking you to leave a review or take a survey (d) Complying with your requests (for example, if you prefer to be contacted at a business or residential	(a) Contact and Identity (b) Profile(c) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)

telephone number and advise us of your preference, we will use this information to contact you at that number)		
To facilitate or otherwise assist you in obtaining a loan credit card or other product from a third party	(a) Contact and Identity(b) Financial(c) Transaction	(a) Performance of a contract with you
To enable you to partake in a prize draw, competition or complete a survey	(a) Contact and Identity(b) Profile(c) Usage(d) Marketing and Communications	(a) Performance of a contract with you(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Contact and Identity(b) 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) Contact and Identity(b) Profile(c) Usage(d) Marketing and Communications(e) Technical	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 monitor our website's performance (such as number of visits, average time spent, page views) and for our business purposes such as working to continually upgrade our website, products/services, marketing, customer relationships and experiences	(a) Technical(b) Usage	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) Contact and Identity(b) Technical(c) Usage(d) Profile(e) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)
To perform a credit check on you to confirm your financial situation and ongoing eligibility for the products and services you have requested	(a) Contact and Identity(b) Financial(c) Transaction	
To protect us against error, fraud, theft and damage to our goods and property, including verifying your identity	(a) Contact and Identity(b) Financial	(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 enable us to comply with applicable law or regulatory process	(a) Contact and Identity(b) Financial(c) Transaction	Necessary to comply with a legal obligation

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. Where required to conduct any direct marketing we will collect your consent. If you wish to amend your marketing preferences at any time please contact us at info@harringtonjones.com.

Promotional Offers from Us

We may use your Contact and Identity, 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).

Where you request information or purchase products and services from us, where you have consented or otherwise indicated you would like to receive marketing materials from us, we may use the e-mail address that you provide to send you information

about offers on products and services that we believe may be of interest to you where you have not opted out of such marketing. If you have asked us to put you on an e-mail mailing list, provide you with certain information on a regular basis, or if we send you information about our offers on products and services by e-mail, you may ask us to remove you from the list at any time (using the unsubscribe instructions provided with each e-mail and on the site where you signed up).

Third-Party Marketing

Where we have your consent, we may also send you certain marketing in relation to third party goods and services.

Aggregated Information

We may use your personal data to create Aggregated Information (as defined below) for the purposes of managing, maintaining, and developing our operations. Such purposes include: (i) identifying the demographics of our clients; (ii) creating and selling benchmarks, reports, summary metrics, predictive algorithms; and (iii) developing new or improving our existing products and/or services. In this Privacy Policy, “Aggregated Information” means information that: (i) arises from the compilation, combination and/or analysis of personal and other information; and (ii) is anonymised. Aggregated Information is not considered personal data in law as this data will not directly or indirectly reveal your identity. However, if we combine or connect Aggregated Information with your personal data so that it can directly or indirectly identify you, we will treat the combined data as personal data which will be used in accordance with this Privacy 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.

In addition, we may process your personal data in compliance with the above rules without your knowledge or consent where we are permitted or required by applicable law or regulatory requirements to do so.

8. When do we Disclose Your Personal data?

We may share your personal data with our employees, contractors, consultants and other parties who require such personal data to assist us with managing our relationship with you, including: third parties that assist Harrington Jones in the provision of services to you and third parties whose services we use to conduct our business.

Such third parties may include lenders and dealerships who may wish to provide you with goods or services, including mortgages, auto loans, personal loans, home services and other insurance products. They may also include related parties who process and store your personal data for us.

For example, our third-party service providers may provide certain information technology, data processing, and advertising/marketing, and call centre services to us from time to time so that we may operate our business, and as result, your personal data may be collected, used, processed, stored, or disclosed in the United States of America and Canada. As a result, your personal data may be used, stored, or accessed in other countries and may be subject to the laws of those countries. For example, information may be disclosed in response to valid demands or requests from government authorities, courts, or law enforcement agencies in those countries.

Where you have requested us to do so (either expressly or by your actions), we may share your personal data with persons who may consider you and/or your application for a loan, credit card or other product or service. In connection with this, Harrington Jones and/or our third-party business affiliate may perform a credit check on you to confirm your financial situation and your initial and ongoing eligibility for the products and services you have requested.

In addition, personal data may be disclosed or transferred to another party during the course of, or completion of, a change in ownership of or the grant of a security interest in, all or a part of Harrington Jones or its affiliates through, for example, an asset or share sale, or some other form of business combination, merger or joint venture, provided that such party is bound by appropriate agreements or obligations and required to use or disclose your personal data in a manner consistent with the use and disclosure provisions of this Privacy Policy, unless you consent otherwise.

Further, your personal data may be disclosed:

- as permitted or required by applicable law or regulatory requirements;

- to comply with valid legal processes such as search warrants, subpoenas or court orders;
- as above, in order to administer or service your claim to obtain credit with one or more third parties;
- to protect the rights and property of Harrington Jones;
- during emergency situations or where necessary to protect the safety of a person or group; or
- with your consent.

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.

Legal Services Providers

Where your enquiry relates to a potential legal claim, we may share your personal data with partner law firms for the purpose of assessing, progressing or managing your claim. These firms act as independent data controllers in relation to the legal services they provide. Our current panel of partner law firms includes:

- 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).
- Locksley Law Solicitors, a trading name of RH Law Limited, Company Number 11444626, authorised and regulated by the Solicitors Regulation Authority (SRA No. 659355).

These firms will receive personal data only where necessary to assess or pursue a claim on your behalf and will process your personal data in accordance with their own privacy policies and professional obligations.

9. How is Your Personal Data Protected?

Harrington Jones endeavours to maintain physical, technical, and procedural safeguards that are appropriate to the sensitivity of the personal data in question. These safeguards are designed to prevent your personal data from loss and unauthorised access, copying, use, modification, or disclosure.

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.

The security of your personal data is important to us, please advise our Data Protection Manager immediately of any incident involving the loss of or unauthorised access to or disclosure of personal data that is in our custody or control.

10. How Long do we Retain Your Personal Data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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, regulatory, tax, accounting or other requirements.

Please contact us if you would like further detail on our retention practices.

In some circumstances you can ask us to delete your data: see Section 13 below for further information.

In some circumstances we will 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.

11. Updating Your Personal Data

It is important that the information contained in our records is both accurate and current. If your personal data happens to change during the course of our relationship, please inform our Customer Care department of this change. If our Customer Care department is unable to help you, please contact our Data Protection Manager using the contact information below.

In some circumstances, we may not agree with your request to change your personal data and will instead append an alternative text to the record in question.

12. 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:
- If you want us to establish the data's accuracy.
 - Where our use of the data is unlawful but you do not want us to erase it.
 - 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.
 - 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.

If you wish to exercise any of the rights set out above please contact our Customer Care department, and if our Customer Care department is unable to help you, please contact our Data Protection Manager using the contact information below.

What We may need from You

When requesting access to your personal data, please note that we may request specific information from you to enable us to confirm your identity and right to access (or any of your other rights), as well as to search for and provide you with the personal

data that we hold about you. 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.

If you require assistance in preparing your request, please contact our Customer Care department. If our Customer Care department is unable to help you, please contact our Data Protection Manager using the contact information below.

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 could refuse to comply with your request in these circumstances.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could 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.

Your legal rights in relation to the personal data that we hold about you is not absolute. There are instances where applicable law or regulatory requirements allow or require us to refuse to provide some or all of the personal data that we hold about you. In addition, the personal data may have been destroyed, erased or made anonymous in accordance with our data retention obligations and practices.

In the event that we cannot provide you with access to your personal data or exercise your other legal rights, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

13. Inquiries or Concerns?

If you have any questions about this Privacy Policy or concerns about how we manage your personal data, please contact our Customer Care department in writing or by e-mail at the details set out below:

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

- By Email to: info@harringtonjones.com
- We will endeavour to answer your questions and advise you of any steps taken to address the issues raised by you. If our Customer Care department is unable to help you, please contact our Data Protection Manager using the contact information below.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator 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.

14. Data Protection Manager (DPM)

We have appointed a DPM to oversee compliance with this Privacy Policy. The contact information for our DPM is as follows:

- By Email to: info@harringtonjones.com
- By Mail to:
Harrington Jones Limited Suite 7 Harbour View, The Albany, South Esplanade, St Peter Port, GUERNSEY, GY1 1AQ

Attention: Data Protection Manager

15. Revisions to this Privacy Policy

Harrington Jones from time to time, may make changes to this Privacy Policy to reflect changes in its legal or regulatory obligations or in the manner in which we deal with your personal data. We will post any revised version of this Privacy Policy on our website www.harringtonjones.com and we encourage you to refer back to it on a regular basis. We will notify you of any material changes to this Privacy Policy via the email address provided by you to us.

Historic versions of this Privacy Policy can be obtained from us by contacting us.

16. Interpretation of this Privacy Policy

Any interpretation associated with this Privacy Policy will be made by our Privacy Manager. This Privacy Policy includes examples but is not intended to be restricted in its application to such examples, therefore where the word 'including' is used, it shall mean 'including without limitation'.

This Privacy Policy does not create or confer upon any individual any rights, or impose upon Harrington Jones any obligations beyond those imposed by applicable data protection laws in the jurisdictions in which it operates, including the Data Protection (Bailiwick of Guernsey) Law, 2017, and, where relevant, the UK General Data Protection Regulation and the Data Protection Act 2018. In the event of any inconsistency between this Privacy Policy and the applicable privacy laws in a specific case, the Privacy Policy shall be interpreted so as to give full effect to, and comply with, such applicable laws.

Harrington Jones Limited (Guernsey) is Authorised and regulated by the Financial Conduct Authority in respect of regulated Claims Management Activity FRN: 834856. Registered Address: Suite 7 Harbour View, The Albany, South Esplanade, St Peter Port, GUERNSEY, GY1 1AQ. Company Number: 53781.