

Privacy Policy

McGowan Corporate Solutions are committed to protecting and respecting your privacy.

Our Privacy Policy together with our Terms of Business is available to view on our website at <http://mcgowancorp.co.uk/>

Our Privacy Policy outlines the personal data we collect from you or that you provide to us and how it will be used, processed and stored by us.

The data protection laws include the Data Protection Act 1998 and, from its entry into force on 25th May 2018, the General Data Protection Regulation (together referred to as DP Law) and the data controller is McGowan Corporate Solutions of Longdene House, Hedgehog Lane, Haslemere, Surrey GU27 2PH.

Our lawful basis for the use and processing of your personal information under DP Law

This will include:

- Processing of your personal information in order that we may perform our obligations under a contract with you;
- Processing for legitimate interests provided these are not overridden by your interests and fundamental rights and freedoms; for instance, this is relevant when we use and process your personal data to deal with our legal and regulatory and internal governance obligations;
- In addition to/conjunction with the processing condition described above, processing which is necessary for compliance with our legal obligations laid down by European Union law (where relevant) and by English Laws applicable to us in the United Kingdom.

The meaning of personal information/personal data

Some of the information we collect about you will readily identify you as an individual. This could include your name, address, date of birth and occupation. This information is personal information (also known as personal data) and the way we use it is governed by DP Law.

Personal Information also includes special categories of personal data. This is data about your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, or data concerning your health, sex life or sexual orientation. In the unlikely event that any of this data is collected from you, you might be asked at the point of collection, to provide your explicit consent where needed in order to justify our processing of it. Our usual practice is not to request any personal information unless it is necessary to perform our contract with you.

Information which you give to us or we collect about you

You may disclose information about you by completing forms, during face to face meetings or by corresponding with us by telephone, e-mail or otherwise. The information you give us may include, without limitation, your name, address, e-mail address, phone number, date of birth and financial information such as details of your earnings, bank account details including sort code and account number and, payment card data.

Information we receive from other sources

We may receive information about you if you use any of the other services we provide. In this case, we will inform you when we collect that data that it may be shared internally and combined with other data collected. We also work with third parties (for example, credit providers, insurers, wholesale brokers, loss adjusters, solicitors and suppliers of services to us (such as credit reference agencies) and, where permitted by DP Laws, we might receive personal information about you from any or all of these third parties. Whilst we have our own obligations under DP Laws in respect of this personal information, it is the obligation of third parties under DP Law to obtain your consent (where relevant) and, to give you notice prior to disclosing your information to us. We may combine this information with information we already hold and use it for some or all of the purposes set out below.

This privacy notice does not apply to the personal data we collect from you when you apply for credit-related products or services (please refer to the separate privacy notice(s) issued to you in the credit agreement on those occasions).

We use information held about you in the following ways:

- To communicate with you and to provide you with information about the products and services that you request from us;
- To perform any contract that we may have with you;
- To notify you about changes to our services or our products;
- To administer our legitimate internal management analysis, audit, forecasts and business planning and transactions;
- To help prevent fraud and reduce credit risk;
- To establish, defend or exercise our legal rights;
- To comply with our legal, regulatory and internal governance obligations;

- For monitoring and recording of telephone calls and email communications where necessary for compliance with regulatory rules or self-regulatory practices or procedures relevant to our business, to prevent or detect crime, for quality, training and security purposes.

Disclosure of your personal information

We may share your personal information with selected third parties including:

- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
- Credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you;
- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of business and other agreements; or to protect the rights, property, or safety of McGowan Corporate Solutions, our customers, or other persons with whom we do business, such as credit intermediaries. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.
- With regulatory authorities, courts and governmental agencies to comply with legal orders, legal or regulatory requirements and government requests.
- Our legal and other professional advisers.

Where we store your personal data (including transfers outside the EEA)

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA") which may not offer the same protections for personal data as is relevant under the DP Law. It may also be processed by staff operating outside the EEA who work for one of our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you will be taken to have agreed to this transfer, storing and processing outside of the EEA in cases where the transfer is necessary for the performance of a contract between you and us (in our capacity as data controller) or for the implementation of pre-contractual measures taken at your request.

Security of your personal data

We take steps to safeguard the personal data we process and make sure it is held securely and in accordance with DP Law. We protect your personal data including that which is transmitted, stored or otherwise processed, from accidental or unlawful destruction, loss, alteration, unauthorised disclosure, or access. These measures include computer safeguards and secured files and facilities. All information you provide to us is stored on secure servers. Any payment transactions will be encrypted.

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 data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Our website may, from time to time, contain links to other websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies.

Retention period or criteria used to determine the retention period

Your personal data will not be kept for longer than is necessary to fulfil the specific purposes outlined in this notice and to allow us to comply with our legal requirements. The criteria we use to determine data retention periods includes the following:

Retention in case of queries. We may retain it for a reasonable period, after you have ceased to use our services, in case of queries received from you or claims made against your Policy;

Retention in case of claims. We may retain it for the period in which you might legally bring claims against us (in the UK this means we will retain it for 6 years) if and to the extent this is relevant to your use of our services;

Retention in accordance with legal and regulatory requirements. We will consider whether we need to retain your personal data because of a legal or regulatory requirement.

If you would like further information about our data retention practice, please contact us.

Your rights under DP Law

We do not usually undertake marketing however, you have the right to ask us not to process your personal data for marketing purposes at any time. This means you can change your mind about receiving marketing communications from us when you have previously consented to this. You can

also exercise the right to prevent our own use of your personal data for direct marketing purposes at any time by contacting us.

You should be aware that you are entitled under DP Law to withdraw your consent, where that has been given, at any time. If you do this and if there is no alternative lawful reason for us to rely on to justify the relevant use or other processing of your personal data, this may affect the use you are able to make of our services.

The DP Law gives you the right to access information held about you by submitting your request to us in writing. You can exercise this right by using the contact information below. You have the right to request access to, rectification and erasure of data relating to you and the right to request copies of your data held by us and the right to object to our use of your data. If you believe that any information we are holding about you is incorrect or incomplete, please write to or email us as soon as possible. We will promptly correct any information found to be inaccurate.

Your right to lodge a complaint with the data privacy supervisory authority

You have the right to lodge a complaint with the UK's Information Commissioner if you consider that we have infringed data privacy laws when processing your personal data.

UK: Information Commissioner's Office <https://ico.org.uk/>

Changes to our Privacy Policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy notice.

Contact

Enquiries in connection with this Privacy Policy are welcomed and should be addressed to

sheona@mcgowancorp.co.uk

Sheona Gosney

McGowan Corporate Solutions

Longdene House

Hedgehog Lane

Haslemere

Surrey GU27 2PH

Telephone 01428 661950

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