

Privacy Policy

Tower Hill Group Ltd DBA ClaimsDepot.co.uk ("We") are committed to protecting and respecting your privacy.

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By

visiting www.claimsdepot.co.uk or www.towerhillgroup.co.uk you are accepting and consenting to the practices described in this policy.

For the purpose of the General Data Protection Regulation (the GDPR), the data controller is Tower Hill Group UK Ltd. 124 City Road, London, EC1V 2NX.

CONTACT

If you have any queries about how we use your personal information you can contact us on any of the following mediums:

- Post: Tower Hill Group Ltd, 124 City Road, London, EC1V 2NX
- Email: info@towerhillgroup.co.uk

INFORMATION WE MAY COLLECT FROM YOU

When you register on www.claimsdepot.co.uk or www.towerhillgroup.co.uk and click the submit button your information is transferred to the Tower Hill Group Ltd database. Once you have completed and submitted your details you have "completed" the registration process confirming you are a member of our website.

The information collected at registration can include, name, address, telephone number, mobile number, email address and date of birth. We may use other reputable partners to provide its services in connection with your registration.

Once you register with claimsdepot.co.uk or towerhillgroup.co.uk you consent to Tower Hill Group Ltd, its sponsor question clients and website sponsors being able to send you communications via the channel(s) you selected as part of the sign up until such time as you exercise your right to opt-out of receiving such communications.

We will share your data with marketing services providers (a list is available upon request), who will use it as an input to products and services to help organisations better understand the likely characteristics of their customers; communicate with them more effectively; and find others like them across a range of marketing channels. In sharing your data with them, we rely on a lawful ground called 'legitimate interest', as our business depends on our ability to partner with third parties who process personal data for marketing-related

reasons. They will also share your data with their customers which may mean that you receive tailored advertising via direct mail or when you visit a website

We use your personal information collected via our website to:

- We collect personal information in order to assess whether we can assist you and enter into a contract with you to process your claim.
- Information you provide to us may be passed over to an FCA licensed claims management company or a registered solicitor
- Tower Hill Group Ltd (operating as ClaimsDepot.co.uk) may receive a fee for passing over your information to the claims management company or solicitor.
- Provide you with information about the products and services we offer
- Provide you with a more personalised service
- Facilitate communication between yourself and others

We may collect and process the following data about you:

- Information you give us. You may give us information about you by filling in forms on our site service (our site) or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you submit an inquiry on our site, subscribe to our services, search for information, participate in discussion boards or other social media functions on our site, enter into a survey or when you report a problem with our site. The information you give us may include your name, address, e-mail address and phone number, financial information, and other personal information.
- Information we collect about you. With regard to each of your visits to our site we may automatically collect the following information:
- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet;
- information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); services you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.

COOKIES

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them see our [Cookie Policy](#)

USES MADE OF THE INFORMATION

We use information held about you in the following ways:

We will use the information you provide to us:

- to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
- to take steps, at your request, to enter into a contract to provide our services. For example, we may process your personal information to discuss our services with you or provide a quote for our services;
- In order for us to represent your claim to the best of our abilities and build the strongest possible case against the investment advisor, we will require as much information around the circumstances at the time of the investment as possible. This will include collecting all evidential documentation available along with your own personal statement of events.
- This information will then be collated and presented to the Financial Services Compensation Scheme (FSCS) via a secure electronic portal or the Financial Ombudsman Service (FOS) if the stockbroker is still trading and is not accepting fault for an identified cause of action. We may also need to show this information to the Claims Management Regulator during routine audits, which are carried out frequently on all regulated firms. During your claim, you may specifically ask us to gather supporting evidence available from third parties through a data subject access request (DSAR), in these circumstances you will need to provide us with specific written consent and we will need to share proof of your identity with the third party in order to complete process the DSAR on your behalf. Once a claim has completed we will retain your records for a period of no longer than 6 years. We do this in case this information is required following the completion of the claim, for example if new evidence comes to light in support of your claim, you may be able to make an appeal and obtain further compensation. Whilst we hold your records we may contact you under a 'legitimate interest' basis if new developments occur that are likely to affect you and the information we are providing will be of benefit.
- to provide you with information about other services we offer that are similar to those that you have already purchased or inquired about;
- to provide you, or permit other possible group companies to provide you with information about goods or services we feel may interest you. If you are an existing client, we will contact you by electronic means (e-mail or SMS), telephone or in writing with information about services similar to those which we provided to you or which were the subject of a previous inquiry from you. If you are a new customer, and where we permit other possible group companies to use your data, they will contact you by telephone and any subsequent means that you may agree with them. If you do not want us to use your data in this way, or to pass your details onto other possible group companies for marketing purposes, please note that you have the right to object to this use of your personal information and to restrict our use of your personal information. You can exercise your right to object and/or restriction by contacting us using the above contact details;
- registrations on claimsdepot.co.uk or towerhillgroup.co.uk may be passed onto a licensed third party claims management expert, that will contact you via one of the methods provided to discuss your potential claim.
- to notify you about changes to our service;

- to ensure that content from our site is presented in the most effective manner for you and for your device;
- to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our site to ensure that content is presented in the most effective manner for you and for your device;
- to allow you to participate in interactive features of our service, when you choose to do so;
- as part of our efforts to keep our site safe and secure;
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- to make suggestions and recommendations to you and other users of our site about services that may interest you or them.

LEGITIMATE INTERESTS

We will process your personal data in circumstances where we have a legitimate interest to do so. This includes in the following circumstances:

- To inform you about other claims which you may be eligible to submit. This includes claims related to timeshare products (such as mis-sold timeshare products,) and claims related to other financial products and services (such as pensions, mortgages and investments);
- To inform you about potential class action claims that may affect you;
- To assist you in circumstances where you have engaged the services of a claims management company charging an upfront fee who does not provide you with a service or provides you with an inadequate service.
- Please note that where we process your personal data on legitimate interest grounds we will only process the personal data that is necessary to fulfill the above legitimate interest.

DISCLOSURE OF YOUR INFORMATION

We may share your personal information with any member of our group, which means our sister companies and any other current or future subsidiaries, holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006 should they exist.

We may share your 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.
- Claims management companies or solicitors that may contact you with the purpose of obtaining your custom for their business.
- Debt recovery agencies for the purposes of recovering any outstanding service fees you may owe us.

We may disclose your personal information to third parties:

- 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 Tower Hill Group Ltd or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred 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 'Website Terms of Use' and other agreements; or to protect the rights, property, or safety of us, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and regulatory compliance.
- Such as our lawyers, accountants and other professional advisers who, from time to time, provide us with professional services to ensure our legal and regulatory compliance.
- When giving consent on our site your information will be shared with Google for tracking and advertising purposes, you can view [Google's Privacy & Terms site here](#).

WHERE WE STORE YOUR PERSONAL DATA

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the fulfillment of our contractual agreement with you, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

All information you provide to us is stored on our secure servers. 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.

DATA RETENTION

If you contract our services we will store your personal data for up to six years from completion of our services. This is to enable us to refer to our records and carry out a thorough investigation in the unlikely event that you want to bring a claim against us with the six year limitation period.

If you do not contract our services we will store your personal data to meet the legitimate interests set out above where you may object to this use of your personal data.

Where you engage our services we will store your personal data beyond the six year limitation period to meet the legitimate interests set out above unless you object to this use of your personal data.

YOUR RIGHTS

Right to access

- You have the right to request copies of the personal information we hold about you at any time.
- Right to rectification
- You have the right to request that we correct any inaccurate personal information we hold about you.
- Right to erasure
- You have the right to request that we delete your personal information from our records.

Please note that we will not be able to delete your personal information whilst we are still providing our services to you. We will be able to delete your personal information once you cancel the service or once the service is completed.

Right to restrict processing

- You have the right to request that we restrict how we use your personal information.
- Right to object
- You have the right to object to the collection and use of your personal information at any time.
- Right to data portability
- You have the right to obtain a copy of your personal information in a legible and compatible format such as Excel or Word.

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 policy.

COMPLAINTS

You can lodge a complaint with us directly by contacting us on one of the above contact details.

You also have the right to lodge a complaint directly with the Information Commissioner's Office (ICO). The ICO are the regulator who makes sure that we use your personal information in a lawful way.

Tower Hill Group Ltd ICO registration number: ZA760652