

Introduction

Etico Group is the data controller and responsible for your personal data (collectively referred to as Etico Group “we”, “us” or “our” in this privacy notice).

Etico Group (trading as PPI Wise, PBA Wise, Delay Wise) is committed to protecting the personal privacy of its clients and any information pertaining to that client. We value your privacy in respect to all personal information we receive from you as a result of your use of our services. We will treat any and all information received confidentially and will only use that information to allow us to deal with your enquiry or to handle your claim, or for our own marketing purposes, with the exception of where the law requires us to disclose it, or where it is necessary to disclose the information to comply with a regulatory or legal obligation.

This privacy notice aims to give you information on how Etico Group collects and processes your personal data, including any data you may provide through this website when you ask us to act on your behalf.

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.

The Information We Collect

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 will collect your information initially when you submit it to us via your online enquiry. The personal information may include your name, address, date of birth, email address and phone number. We may also collect details of which lenders you have taken out finances with.

In addition, we may collect the number given to your computer or device on the internet, known as an Internet Protocol address and other device related information such as your operating system and platform, browser details, time zone and device type. We will also collect data about how you use our website, products and services.

We also 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 date of birth data with others to identify demographic trends. 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 policy.

We do not routinely collect any Sensitive Personal Data about you such as details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership and genetic and biometric data. Nor do we collect any information about criminal convictions and offences. However, during the course of our service 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 specific needs and circumstances. We will use this data for the sole purpose of delivering our service appropriately, in accordance with our legal and regulatory requirements.

If you decide to opt in to our full service and ask us to make a claim for mis-selling on your behalf, we may need to collect information from you regarding any pre-existing medical conditions, which will be treated as Sensitive Personal Data and used in accordance with this privacy policy.

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 entered into with you (for example, to represent your claim to a lender). 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.

How We Use Your Information

Predominantly, we will use the personal information we collect from and about you to carry out the service(s) you have asked us to carry out for you and to perform the contract we have entered into with you.

We will also use it where we need to do so to comply with any legal or regulatory obligations, and where we have your consent, to contact you with marketing information about other Etico products or services that we think you may find useful. You are free to withdraw your consent for marketing at any time by emailing us at unsubscribe@eticogroup.co.uk

We may also use aggregated or technical data for analytical purposes relating to client demographics, website performance & optimisation and to assess the performance of our marketing.

When you submit your initial enquiry to us, we are relying upon that as your consent to carry out a free PPI check and will process your data on that basis. If you have opted into our full service, we are processing your data in order to perform our contract with you and to fulfil our obligations under it.

Third Parties

Etico will only share your information with third parties in conjunction with the service you have asked us to provide. We only use trusted partners and do not allow our third-party service providers to use your personal data for their own purposes. These may include :

- Advertising networks and platforms – When you submit your initial enquiry to us, the website you come from may be operated on our behalf by a third party.
- Internal Systems Providers – EG. Case management and other software we use to operate the service we provide to you. These necessarily provide a backup function for business recovery purposes, which entails them holding copies of our data.
- Telephone service provider – All calls to Etico are recorded for training and monitoring purposes (recordings are paused during bill payment transactions when you give your card details)
- Marketing partners – If we are sending marketing material to you, we sometimes use external providers to make the arrangements.
- Satisfaction Surveys – We value customer feedback and may ask third parties to obtain your views on the service we provided

- Merchant Services – If you pay for our services over the telephone using your card, we must share your information for verification purposes.
- Litigation Services – Occasionally, circumstances may arise during your claim that mean Court action is in your best interests. We may need to share your information with solicitors in the event that occurs.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law.

We will also share your information if required to do so for legal or regulatory reasons. Such as, HMRC, fraud prevention agencies, regulatory bodies (Claims Management Regulator and the ICO).

Data Security

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. All data transfers with the third parties outlined above are done via secure server and use the https standard. 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.

Data outside of the European Economic Area (EEA)

We do not share any personal data with any providers based outside of the EEA, however the physical location of some web hosting involved in our process may be based in the U.S. and are therefore outside of the EEA. We have ensured the adequacy and security of this transfer is limited to those providers who comply with the Privacy Shield Framework, set forth by the US Department of Commerce regarding the collection, use, and retention of personal information transferred from the EEA.

Retention Period

We are required by law or regulation to retain certain information for a specified period, otherwise we will only retain your information for as long as is necessary. We have policies and procedures in place to meet our obligations in this regard. 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. Details of our retention policy can be requested by contacting us directly and a copy will be made available on request.

Your 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.

If you wish to exercise any of the rights set out above, please contact us either at subjectaccessrequest@eticogroup.co.uk, or by post with the words "Subject Access Request" clearly marked. 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.

This Privacy Policy was last updated on 21st May 2018