

Johnston Financial Solutions Privacy Notice

Who We Are

Johnston Financial Solutions is a trading style of Johnston Financial Solutions Limited, a Commercial Finance Broker based in Northern Ireland. Johnston Financial Solutions Limited is authorised and regulated by the Financial Conduct Authority, FRN 669355. Our registered business address is 36 Bigwood Road, Ardmore, Derry~Londonderry BT47 3RP.

What Data Do We Collect?

We collect the following data:

- **Personal Identification Information:** Name, address, email address, phone number, etc.
- **Previous Contact Details:** Information about prior interactions regarding our services.
- Service Details: Information on services you have received from us.
- Correspondence: Our communications with you.
- Third-Party Information: Data from sources such as credit reference agencies and publicly available resources (e.g., Companies House).

How Do We Collect Your Data?

You provide data directly when you:

- Register online or contact us to enquire about our services.
- Engage us to provide services.
- Voluntarily complete a customer survey or provide feedback.
- Use or view our website via your browser's cookies.

We may also receive your data indirectly from:

- Lenders' responses following an application.
- Third-party data providers such as credit reference agencies or Companies House.

Special Category Data

In interactions with us, you may share information classified as 'Special Category Data,' including:

- Race
- Ethnic origin
- Politics
- Religion
- Trade union membership
- Genetics
- Biometrics



- Health
- Sex life
- Sexual orientation

We will seek explicit consent to store and process such information and implement appropriate safeguards to protect it.

How Will We Use Your Data?

We use your data to:

- Process your application and manage your request.
- Email you with information on products and services we think you might like.
- Monitor the performance of our products and services to ensure positive consumer outcomes.
- Comply with Anti-Money Laundering regulatory requirements.

Lawful Basis for Processing Data

Data Type	Lawful Basis
Personal	Performance of a contract – To provide the services you have
Identification	requested.
Previous Contact	Legitimate interests – To maintain accurate records of our
Details	interactions.
Service Details	Performance of a contract – To deliver and manage the services you
	receive.
Correspondence	Legitimate interests – To address enquiries and improve our services.
Third-Party	Legal obligation – To comply with regulatory requirements, such as
Information	anti-money laundering laws.
Special Category Data	Explicit consent – To process sensitive information you have
	provided.

Data Retention Period

We retain your data only as long as necessary for the purposes outlined:

Data Type	Retention Period	Deletion Method
Personal	7 years after the end of our	Secure deletion from electronic systems and
Identification	business relationship.	shredding of physical documents.
Previous Contact	7 years after the end of our	Secure deletion from electronic systems and
Details	business relationship.	shredding of physical documents.
Service Details	7 years after the end of our	Secure deletion from electronic systems and
	business relationship.	shredding of physical documents.
Correspondence	7 years after the end of our	Secure deletion from electronic systems and
	business relationship.	shredding of physical documents.
Third-Party	7 years after the end of our	Secure deletion from electronic systems and
Information	business relationship.	shredding of physical documents.



Special Category Data Retained only as long as necessary for the specific purpose consented to. Secure deletion from electronic systems and shredding of physical documents upon withdrawal of consent or fulfilment of purpose.

Data Sharing with Third Parties

We share your data with partner companies to offer you their products and services. These include:

- Lenders and financial institutions relevant to your application.
- Credit reference agencies for identity verification and credit assessment.
- Regulatory bodies as required by law.
- Trusted third-party service providers, including a virtual assistant based in Northern Ireland, to facilitate the processing of applications, client communications, and other administrative tasks. These third parties are contractually obligated to protect your data in compliance with this Privacy Notice and UK data protection laws.

Credit Reference Agency Information Notice (CRAIN)

We may share your personal information with credit reference agencies as part of contract performance. For more information on how they process personal data, please visit Credit Reference Agency Information Notice https://www.experian.co.uk/legal/crain/

Data Storage and Security

We store your data securely on UK-based servers with the following security measures:

- Data encryption
- Firewalls
- Regular security audits
- Access controls to ensure only authorized personnel can access your data
- Additionally, we use secure, industry-standard third-party platforms to assist in data
 processing tasks. These include customer relationship management systems for
 efficient client communication and record-keeping, as well as document handling
 platforms to securely generate and manage contractual documentation. These
 platforms are contractually obligated to comply with UK data protection laws and
 implement robust security measures.

Marketing

We may send you information about our products and services and those of our partners that we think you might like. If you have agreed to receive marketing, you may opt out at any time.



Your Data Protection Rights

You have the following rights:

- Right to Access: Request copies of your personal data.
- **Right to Rectification:** Request correction of inaccurate information.
- Right to Erasure: Request deletion of your personal data under certain conditions.
- **Right to Restrict Processing:** Request limitation of data processing under certain conditions.
- Right to Object to Processing: Object to data processing under certain conditions.
- **Right to Data Portability:** Request transfer of your data to another organization or directly to you under certain conditions.

To exercise these rights, contact us at info@johnstonfinancialsolutions.co.uk or call 07803 312874.

Cookies

Our website uses cookies to enhance user experience and analyse website traffic. Cookies are text files placed on your computer to collect standard Internet log information and visitor behaviour information.

Types of Cookies We Use

We obtain your consent for non-essential cookies when you first visit our website. You can also manage your cookie preferences directly via the settings on our website.

- **Functionality Cookies:** Recognize you on our website and remember your preferences.
- **Analytical Cookies:** Collect information on website usage to help us improve our services.

Cookie Table

Cookie Name Purpose		Expiration Type	
_ga	Google Analytics – Tracks user behaviour on the website.	2 years	Analytical
_gid	Google Analytics – Distinguishes users.	24 hours	Analytical
gat	Google Analytics – Throttles request rate.	1 minute	Analytical

Managing Cookies

You can set your browser to refuse cookies or remove existing cookies. However, some website features may not function as a result. For more information, visit All About Cookies Online Privacy and Digital Security

Privacy Policies of Other Websites

Our website contains links to other websites. Our privacy policy applies only to our website. If you click on a link to another website, you should read their privacy policy.



Changes to Our Privacy Policy

We regularly review our privacy policy and place updates on this web page. This privacy policy was last updated on 2nd January 2025.

How to Contact Us

If you have any questions about our privacy policy or the data we hold on you, or to exercise your data protection rights, please contact us:

• Email: info@johnstonfinancialsolutions.co.uk

• **Phone:** 07803 312874

• Address: 36 Bigwood Road, Ardmore, Derry~Londonderry BT47 3RP

Contacting the Information Commissioner's Office (ICO)

If you feel your concern has not been addressed satisfactorily, you may contact the ICO at <u>Information Commissioner's Office (ICO)</u>

Our Data Protection Registration Reference is ZA011281

By signing below, you acknowledge that you have read, understood, and agree to the terms outlined in the above Privacy Notice.

[[ESIGN:SIGNATURE1]]

Website