



JBR Recovery Ltd

Confidentiality and Data Protection Agreement

Before providing us with any information relating to either yourself &/or other identifiable living individuals in connection with this Agreement, you should be aware of & provide the following information to all other identifiable living individuals whose data is to be supplied.

(a) The categories of personal data that you are providing to us;

(b) Our identity, and that you/they can contact our data protection officer at dataprotection@jbr.co.uk or via post at our address: Data Protection Officer, Data Protection, Argenter House, Oldbury Road, West Bromwich, B70 9BS.

(c) that we may process received personal data as data controller for the purposes of:

- (i) administering and operating your account;
- (ii) complying with applicable regulations;
- (iii) our legitimate interests, particularly in the course of the operational support and development of our business, including to evaluate customer service, efficiency and cost, as well as risk management purposes;
- (iv) carrying out credit, money laundering and conflict checks for the prevention of fraud and financial crime;
- (v) exercising and defending our legal rights anywhere in the world;
- (vi) complying with legal and regulatory requests made to us anywhere in the world;
- (vii) reporting to and/or being audited by, national and international regulators and complying with court orders associated with us.

(d) that this processing is permitted by applicable data protection law because it is

- (i) necessary for the purposes of our legitimate interests in pursuing the purposes set out above (which are overridden by prejudice to the relevant individuals' privacy); and/or
- (ii) in certain cases, necessary so that we can comply with applicable regulations;

(e) that we may disclose received personal data to persons in the categories identified in (c: ii, iv, v, vi, vii) above and from (f) – (i) below;

(f) that this may involve transfer of received personal data to any country, including countries outside the European Economic Area, but that in those cases, except where the relevant country has been determined to ensure an adequate level of data protection by the European Commission or we need to make the transfer in order to perform a contract concluded in the interests of the relevant individual, we will ensure the transferred personal data is protected by a data transfer agreement. You may obtain further details of these transfers and agreements by contacting our Data Protection officer at dataprotection@jbr.co.uk.

(g) that we will retain received personal data for a minimum of 5 years to meet legal, regulatory and business requirements. Retention periods may be extended if we are required to preserve personal data in connection with litigation, investigations and proceedings; and

(h) that you/they have rights of access to, and rectification or erasure of, received personal data and restriction or objection to its processing, which you/they can exercise by contacting us (see paragraph (b) above) excluding circumstances denoted in section (g); and

(i) can lodge complaints about our processing of received personal data with the Office of the Information Commissioner (www.ico.org.uk)



JBR Recovery Ltd

Argentor house
Oldbury Road
West Bromwich
B70 9BS

Company Registration: 2623872

V1.0 August 2019