

Henley Offshore Financial Services Limited Privacy Notice

Effective Date: 25th April 2025

Last Reviewed: 25th April 2025

1. Introduction

Henley Offshore Financial Services Limited ("HOFSL") and Henley Offshore Mortgage Services Limited ("HOMS") are committed to protecting your personal information.

This Privacy Notice explains how we collect, use, share, and protect your data in accordance with the Data Protection (Jersey) Law 2018 ("DPJL").

2. Who We Are

Henley Offshore Financial Services Limited is regulated in the conduct of investment business by the Jersey Financial Services Commission.

Henley Offshore Mortgage Services Limited provides mortgage services under the brand "The Mortgage Shop."

Registered Address:

2-6 Church Street, St Helier, Jersey JE2 3NN

3. What Information We Collect

We may collect and process the following categories of personal information:

- Identification data (e.g., name, date of birth, nationality)
- Contact details (e.g., address, telephone number, email address)
- Financial information (e.g., income, assets, liabilities)
- Employment details
- Family and beneficiary information
- Mortgage and loan details
- Special category data (e.g., health information for insurance purposes, where necessary)

4. How We Use Your Information

We use your information for the following purposes:

- To provide financial advice and mortgage services
- To comply with legal and regulatory obligations (e.g., anti-money laundering checks)
- To manage our relationship with you
- To send relevant updates, including newsletters and mortgage bulletins (with your consent)
- To handle complaints or legal claims
- For internal analysis and service improvement

5. Legal Basis for Processing

We process your personal data under one or more of the following legal bases:

- Performance of a contract with you

- Compliance with legal obligations
- Legitimate interests (e.g., service improvement, security)
- Consent (where marketing communications are concerned)

6. Sharing Your Information

We may share your information with:

- Regulatory authorities (e.g., Jersey Financial Services Commission)
- Third-party service providers (e.g., screening providers, IT support) under strict confidentiality agreements
- Professional advisers (e.g., auditors, legal advisers)
- Other parties with your explicit consent

We will never sell your personal information to third parties.

7. International Data Transfers

If your personal information is transferred outside Jersey, we ensure appropriate safeguards are in place to protect it.

8. How Long We Keep Your Data

We retain personal data as follows:

- **12 months** for pre-sale inquiries
- **5 years** after mortgage-only advice
- **10 years** after investment or protection advice
- **Indefinitely** for pension transfer advice

Records may be retained longer if required by law or regulatory obligation.

9. Your Rights

You have the following rights under the DPJL:

- Right of access to your data
- Right to rectify inaccurate or incomplete data
- Right to request erasure (subject to regulatory obligations)
- Right to restrict processing
- Right to object to processing
- Right to data portability

To exercise any of these rights, please contact our Compliance Officer using the contact details below.

10. How We Protect Your Information

We use robust security measures, including encryption where appropriate, to protect your data from unauthorized access, disclosure, or loss.

11. Data Breaches

If a serious personal data breach occurs, we will report it to the Jersey Office of the Information Commissioner (JOIC) within 72 hours, if required by law, and inform affected individuals where appropriate.

12. How to Contact Us

Compliance Officer

Henley Offshore Financial Services Limited
Email: [insert Compliance Officer's email address]
Telephone: [insert telephone number]

13. Complaints

If you are dissatisfied with our use of your personal information, you have the right to lodge a complaint with:

Jersey Office of the Information Commissioner (JOIC)

Website: www.jerseyoic.org

End of Privacy Notice