

## **Henley Offshore Financial Services Limited Privacy Notice**

**Effective Date:** 25<sup>th</sup> April 2025

**Last Reviewed:** 25<sup>th</sup> 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](http://www.jerseyoic.org)

**End of Privacy Notice**