

## DATA PRIVACY NOTICE

We take your privacy very seriously and we ask that you read this privacy notice carefully as it contains important information on who we are, how and why we collect, store, use and share personal data, your rights in relation to your personal data and on how to contact us and supervisory authorities in the event you have a complaint.

*Italicised* words in this privacy notice have the meaning set out in the Glossary of Terms at the end of this document.

### Who we are

Carrington Investment Consultants Ltd collects uses and is responsible for certain personal data about you. When we do so we are required to comply with *data protection regulation* and we are responsible as a *data controller* of that personal data for the purposes of those laws.

When we mention "Carrington Investments or Carrington", "we", "us" or "our" we are referring to Carrington Investment Consultants Limited.

Carrington is a company registered in England and Wales (company number 3193939) whose registered office is at 29 Gloucester Place, London, W1U 8HX. Carrington Investment Consultants Limited is authorised and regulated by the Financial Conduct Authority. Carrington Investment Consultants Limited Financial Services Register number is 566 946.

We provide you with intermediary services.

### The personal data we collect and use

In the course of providing our service to you we may collect the following personal data when you provide it to us:

- contact information
- identity information
- financial information
- employment status
- lifestyle information

- health information
- details of any vulnerability
- details of your dependents and/or beneficiaries under a policy **(If you are providing information about another person we expect you to ensure that they know you are doing so and are content with their information being provided to us. You might find it helpful to show them this privacy notice and if they have any concerns please contact us in one of the ways described below.**
- product details

### Information collected from other sources

We also obtain personal data from other sources in the course of providing our *intermediary services*. Where we obtain this information from another party it is their responsibility to make sure they explain that they will be sharing personal data with us and, where necessary, ask permission before sharing information with us.

The personal data we obtain from other sources may include the following:

- From lenders and/or product providers:
  - product details
  - financial information
  - contact and identity information
- From identification and verification checking agencies:
  - identity information
  - sanction check information

### How we use your personal data

The below table sets out:

- how we use your personal data
- the lawful bases upon which we collect and use your personal data
- who we routinely share your personal data with

Rationale/Reason for Processing	Lawful Basis for Processing	Third party recipients linked to that activity
<ul style="list-style-type: none"> <li>to provide you with intermediary services</li> </ul>	Performance of a contract	Bankhall Support Services Posix Limited (IT Support) Voyant Cashflow Software
<ul style="list-style-type: none"> <li>to apply for products on your behalf</li> <li>to apply for decisions in principle for mortgage products and/ or quotations for protection products on your behalf</li> </ul>	Performance of a contract	Product providers and lenders
<ul style="list-style-type: none"> <li>to refer you to third party advisers to provide you with advice in relation to specialist advice (pension transfers/ general insurance), tax and legal advice</li> </ul>	Consent	Providers with whom we would disclose and discuss their relevance with you, prior to sharing your details.  Please contact us for a list of our current professional connections.
<ul style="list-style-type: none"> <li>to send you marketing communications – newsletters, market commentaries, event invitations</li> </ul>	Consent	Campaign Monitor email system Flamme Rouge Consulting
<ul style="list-style-type: none"> <li>to retain records for any services or advice provided to you by us in order to defend potential legal claims or complaints</li> </ul>	Legitimate Interest	Enable back office system & Wealth Platform Intelliflo back office system Virtual Cabinet CRM and online Portal

### Special category data

Certain types of personal data are considered more sensitive and so are subject to additional levels of protection under data protection legislation. These are known as ‘special categories of data’ and include data concerning your health, racial or ethnic origin, genetic data and sexual orientation. Data relating to criminal convictions or offences is also subject to additional levels of protection.

We may process:

- health information and lifestyle information when providing *intermediary services* in relation to a protection insurance product; and/or

In addition to the lawful basis for processing this information set out in the above table, we will be processing it either (i) for the purpose of advising on, arranging or administering an insurance contract or (ii) for the establishment, exercise or defence of legal claims.

In the course of our activities relating to the prevention, detection and investigation of financial crime, we may process criminal conviction or offence information.

Where we do so, in addition to the lawful basis for processing this information set out in the above table, we will be processing it for the purpose of compliance with regulatory requirements relating to unlawful acts and dishonesty.

### Marketing

We may use personal data we hold about you to help us identify, tailor and provide you with details of products and services from us that may be of interest to you. We will only do so where we have obtained your consent or have a legitimate business reason to do this and will do so in accordance with any marketing preferences you have provided to us.

In addition, where you provided your consent, we may provide you with details of products and services of third parties where they may be of interest to you.

You can opt out of receiving marketing at any time. If you wish to amend your marketing preferences, please contact us:

By phone: 020 7034 7037

By email: [info@carringtoninvestments.co.uk](mailto:info@carringtoninvestments.co.uk)

By Post: 29 Gloucester Place, London, W1U 8HX

In addition, you can opt out of receiving marketing at any time by clicking the 'unsubscribe' link at the bottom of every email.

## Whether information has to be provided by you, and if so why

We will tell you if providing some personal data is optional, including if we ask for your consent to process it. In all other cases you must provide your personal data in order for us to provide you with *intermediary services*.

## How long your personal data will be kept

We will retain personal data to enable us to fulfil our obligations to you as a client or contact, and our professional risk management and regulatory obligations. This data will be retained so far as it remains relevant to the services that we provide (or have provided) to you and any superfluous data will be cleaned from our systems regularly.

## Transfer of your information out of the EEA

We utilise third parties that may store your personal data in the following countries which are located outside the European Economic Area (EEA) as follows:

- USA is used to process and store data;
- Australia is used to process and store data;

Such countries do not have the same data protection laws as the United Kingdom and EEA. Whilst the European Commission has not given a formal decision that such countries provide an adequate level of data protection similar to those which apply in the United Kingdom and EEA. All third parties who do process and store data outside of the UK and EEA will be subject to due diligence to ensure they adhere to the requirements of GDPR and that sufficient processes and policies are put in place to help safeguard your data and privacy rights and give you remedies in the unlikely event of a misuse of your personal data. To obtain copies or links to such third-party policies, please contact us on [info@carringtoninvestments.co.uk](mailto:info@carringtoninvestments.co.uk).

You have a right to ask us for more information about the safeguards we have put in place as mentioned above. To learn more, please see 'Your rights' below.

## Your rights

You have legal rights under *data protection regulation* in relation to your personal data. These are set out under the below headings:

- To access personal data
- To correct / erase personal data
- To restrict how we use personal data
- To object to how we use personal data
- To ask us to transfer personal data to another organisation
- To find out more about how we use personal data

We may ask you for proof of identity when making a request to exercise any of these rights. We do this to ensure we only disclose information or change your details where we know we are dealing with the right individual.

We will charge a fee, if we think your request is unfounded, repetitive or excessive. Where a fee is necessary, we will inform you before proceeding with your request.

We aim to respond to all valid requests within one month. It may however take us longer if the request is particularly complicated or you have made several requests. We will always let you know if we think a response will take longer than one month. To speed up our response, we may ask you to provide more detail about what you want to receive or are concerned about.

We may not always be able to fully address your request, for example if it would impact the duty of confidentiality we owe to others, or if we are otherwise legally entitled to deal with the request in a different way.

### **To access personal data**

You can ask us to confirm whether or not we have and are using your personal data. You can also ask to get a copy of your personal data from us and for information on how we process it.

### **To rectify / erase personal data**

You can ask that we rectify any information about you which is incorrect. We will be happy to rectify such information but would need to verify the accuracy of the information first.

You can ask that we erase your personal data if you think we no longer need to use it for the purpose we collected it from you.

You can also ask that we erase your personal data if you have either withdrawn your consent to us using your information (if we originally asked for your consent to use your information), or exercised your right to object to further legitimate use of your information, or where we have used it unlawfully or where we are subject to a legal obligation to erase your personal data.

We may not always be able to comply with your request, for example where we need to keep using your personal data in order to comply with our legal obligation or where we need to use your personal data to establish, exercise or defend legal claims.

### **To restrict our use of personal data**

You can ask that we restrict our use of your personal data in certain circumstances, for example

- where you think the information is inaccurate and we need to verify it;
- where our use of your personal data is not lawful, but you do not want us to erase it;
- where the information is no longer required for the purposes for which it was collected but we need it to establish, exercise or defend legal claims; or
- where you have objected to our use of your personal data, but we still need to verify if we have overriding grounds to use it.

We can continue to use your personal data following a request for restriction where we have your consent to use it; or we need to use it to establish, exercise or defend legal claims, or we need to use it to protect the rights of another individual or a company.

### **To object to use of personal data**

You can object to any use of your personal data which we have justified on the basis of our legitimate interest, if you believe your fundamental rights and freedoms to data protection outweigh our legitimate interest in using the information. If you raise an objection, we may continue to use the personal data if we can demonstrate that we have compelling legitimate interests to use the information.

### **To request a transfer of personal data**

You can ask us to provide your personal data to you in a structured, commonly used, machine-readable format,

or you can ask to have it transferred directly to another data controller (e.g. another company).

You may only exercise this right where we use your personal data in order to perform a contract with you, or where we asked for your consent to use your personal data. This right does not apply to any personal data which we hold or process outside automated means.

### **You can contact us for more information**

If you are not satisfied with the level of information provided in this privacy notice, you can ask us about what personal data we have about you, what we use your information for, who we disclose your information to, whether we transfer it abroad, how we protect it, how long we keep it for, what rights you have, how you can make a complaint, where we got your data from and whether we have carried out any automated decision making using your personal data.

If you would like to exercise any of the above rights, please:

- email or write to our Data Protection Team at [info@carringtoninvestments.co.uk](mailto:info@carringtoninvestments.co.uk) or 29 Gloucester Place, London, W1U 8HX;
- let us have enough information to identify you, e.g. name, address, date of birth;
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- let us know the information to which your request relates.

## **Keeping your personal data secure**

We have appropriate security measures in place to prevent personal data from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal data to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

## **Our supervisory authority**

If you are not happy with the way *we* are handling your information, you have a right to lodge a complaint with the Information Commissioners Office. It has enforcement powers and can investigate compliance with *data protection regulation* ([www.ico.org.uk](http://www.ico.org.uk)).

We ask that you please attempt to resolve any issues with us before the ICO.

## **How to contact us**

Please contact our Data Protection Team if you have any questions about this privacy notice or the information we hold about you.

If you wish to contact them please send an email to [info@carringtoninvestments.co.uk](mailto:info@carringtoninvestments.co.uk) or 29 Gloucester Place, London, W1U 8HX.

## Glossary of Terms

<b>we, us or our</b>	Carrington Investment Consultants is a limited company registered in England and Wales, company number 3193939 and having its registered office at 29 Gloucester Place, London, W1U 8HX		
<b>contact information</b>	these are details that can be used to contact a person, including title, first name, surname, personal telephone number, fax, email address, home address, country, postcode or city of residence. This may also include work contact information such as work telephone number, fax, work email and work address		
<b>data controller</b>	means a natural or legal person (such as a company) which determines the means and purposes of processing of personal data. For example, <i>we</i> are your data controller as <i>we</i> determine how <i>we</i> will collect personal data from you, the scope of data which will be collected, and the purposes for which it will be used in the course of <i>us</i> providing you with <i>intermediary services</i>		
<b>data protection regulation</b>	applicable data privacy and protection laws		
<b>employment status</b>	this is information about your work, if you are employed, self-employed, unemployed, a student or on job seeker allowance		
<b>FCA</b>	the Financial Conduct Authority, being the independent watchdog that regulates financial services		
<b>financial information</b>	this is information relating to your financial status, including salary/income, outgoings/expenditure, tax rate and P60		
<b>health information</b>	this is information relating to your medical history, including symptoms, diagnoses, procedures and outcomes, as well as information about your height and weight. This could include previous and current or persistent medical conditions and family medical history		
<b>identity information</b>	this is any information that can be used to distinguish a person or verify their identity, such as name, date of birth, place of birth, gender, marital status, national identity card/number, passport, drivers licence and national insurance number		
<b>intermediary services</b>	these are the services we provide to you in relation to the products, which may include: <ul style="list-style-type: none"> <li>• Life Planning</li> <li>• Pension and Investment Advice</li> </ul>		<ul style="list-style-type: none"> <li>• Protection Advice</li> <li>• Advice on Alternate Investments</li> <li>• Mortgage Advice</li> </ul>
<b>lenders</b>		a mortgage lender (for a list of current lenders which <i>we</i> work with, please contact <i>us</i> – see <i>How to contact us</i> above)	
<b>lifestyle information</b>		this includes both work and leisure behaviour patterns. Most relevant to your <i>products</i> may be your smoker status, alcohol consumption, health, retirement age and exercise habits	
<b>product</b>		this is an investment, pension, mortgage or protection policy in respect of which we provide <i>intermediary services</i> to you	
<b>product provider</b>		a company which provides investment, pension, protection and/or general insurance products (for a list of product providers which <i>we</i> work with, please contact <i>us</i> – see <i>How to contact us</i> above)	
<b>sanction check information</b>		this is information relating to your politically exposed persons (PEPs) status and Her Majesty's Treasury financial sanctions status, which is recorded to prevent fraud and money laundering	
<b>vulnerability</b>		a vulnerable consumer is someone who, due to their personal circumstances, is especially susceptible to detriment, particularly when an advisory firm is not acting with appropriate levels of care. These customers are more likely to suffer severe detriment if something goes wrong. Details of vulnerability fall in to the following categories: health; resilience (financial); life events; and capability (financial knowledge/confidence)	