



PRIVACY POLICY

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January 2021

At Kingswood Financial Planning Ltd, we're committed to protecting and respecting your privacy.

This policy explains when and why we collect personal information about people who visit our website or seek our services, how we use it, the conditions under which we may disclose it to others and how we keep it secure. We may change this Policy from time to time, so please check this page on our website occasionally to ensure that you're happy with any changes. By using our website, you're agreeing to be bound by this Policy.

Any questions regarding this Policy and our privacy practices should be sent by email to hello@kingswoodfp.com or by writing to the Data Controller, Kingswood Financial Planning Ltd, Carlton House, 19 West Street, Epsom, Surrey KT18 7RL. Alternatively, you can telephone 01372 898500.

How do we collect information from you?

We obtain information about you when you use our website, and if you seek our advice or other services.

What type of information is collected from you?

If you are visiting our website, the personal information we collect might include your name, address, email address, IP address, and information regarding what pages are accessed and when.

If you are seeking advice or other services from us we will undertake a 'getting to know you' process. This will include obtaining information about your personal and financial circumstances and objectives. Where you have investments or policies we will obtain information on these either from you or upon consent from you directly from the providers concerned. We will assess your Attitude to Risk and Capacity for loss and record this in our documentation. We will retain records of any investments or policies that you arrange through us.

Where we are providing an ongoing service, we will update the information as part of our review process and make note in our records.

Information may be obtained from you face to face or through email or post or completion of online documentation. As the information is required to enable us to provide our services, if you opt not to provide it, we may not be able to continue to advise you.

There may be situations where the information we require is of

a special category of personal data (or sensitive data) under the legislation e.g. health and ethnic origin. In this case we will explain why we need it and obtain your consent to obtain the data. This situation most commonly occurs where we are arranging protection and annuity products and need to obtain medical information from you.

How is your information used?

We will use your information to:

- i. Act as the basis for any advice we provide;
- ii. To carry out our obligations arising from any contracts entered into by you and us;
- iii. Provide information to investment providers or life assurance firms for the purposes of arranging products and services for you;
- iv. Provide our ongoing service to you;
- v. Meet our regulatory obligations in the services we provide to you.

The primary legal basis that we intend to use for the processing of your data is for the performance of our contract with you. The information that we collect about you is essential for us to be able to carry out the services that you require from us effectively. Without collecting your personal data we would also be unable to fulfil our legal and regulatory obligations.

How long is information retained?

We are required by legislation and the Financial Conduct Authority rules to retain records for specified periods. These vary dependent upon the nature of the service provided and are generally:

- i. Six years for investment business
- ii. Indefinitely for pension transfers and opt-outs
- iii. Three years for insurance business

These are minimum periods, during which we have a legal obligation to retain your records.

We reserve the right to retain data for longer where we believe it is in our legitimate interests to do so. You have the right to request deletion of your personal data. We will comply with this request, subject to the restrictions of our regulatory obligations and legitimate interests as noted above.

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Information about connected individuals

We may need to gather personal information about your close family members and dependants in order to provide our service to you effectively. In such cases it will be your responsibility to ensure that you have the consent of the people concerned to pass their information on to us. We will provide a copy of this privacy notice for them or, where appropriate, ask you to pass the privacy information to them.

Who has access to your information?

We will not sell or rent your information to third parties.

We will not share your information with third parties for marketing purposes.

Third-Party Service Providers working on our behalf:

We may pass your information to our third-party service providers (including investment houses and life assurance firms), agents, subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf such as paraplanning and compliance support. However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own direct marketing purposes. Please be reassured that we will not release your information to third parties beyond the firm for them to use for their own direct marketing purposes, unless you have requested us to do so, or we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime.

Contacting you

We will make appropriate contact with you to provide the agreed services. Where this includes our ongoing service, we will contact you at the agreed intervals to undertake our review. We may also contact you in between the agreed intervals if we believe that you need to take action (e.g. if you should consider making ISA or pension contributions before tax year end) or be aware of changes in the economic situation.

We will not contact you for marketing purposes by post, email, phone or text message unless you have given your prior consent. You can change your marketing preferences at any time by contacting us by post or email to: hello@kingswoodfp.com

Your rights in relation to your information

The accuracy of your information is important to us. Where we provide just an initial advice service, the information will reflect your situation at that time and we will not normally update this (apart from a change of contact information). Where we are providing an ongoing service, we will update the information as appropriate when we undertake a review with you. If between reviews you change your contact information, please notify us and we will update our records.

Under EU requirements you have a number of specific rights and these are summarised below:

Access – You may ask for a copy of the information Kingswood Financial Planning Ltd hold about you and we will provide this within one month of receipt free of charge (we may charge a fee for subsequent or duplicate requests).

Rectification – You may ask us to correct any information that we hold that is inaccurate or incomplete.

Erasure – You may ask us to delete or cease processing data in certain situations. Please note that we will have regulatory obligations to retain information for certain time periods and we will retain such information as we believe is necessary to fulfil these obligations.

Restrict processing – You may ask us to cease processing information. This means that we will be able to retain it, but no longer act upon it. In the event that you no longer need our services and terminate them, we will automatically cease processing information.

Portability – You may have the right to have your data transferred to another service provider in an appropriate electronic format. Please note that we will have regulatory obligations to retain copies of the information as outlined previously.

Objection – You may have the right to object to us processing information or using it for marketing purposes.

This is a brief summary of your rights and there may be restrictions on some of them. If you wish to explore any of these rights at any time, please contact us on the address given above and we will be pleased to assist you.

Security precautions in place to protect the loss, misuse or alteration of your information

When you give us personal information, we take steps to ensure that it is retained securely and processed in a confidential manner. Your information may be accessed by your adviser and our support staff for the purposes of providing our services to you. In addition, it may be accessed by senior managers and our compliance consultants (or the FCA) for the purposes of ensuring compliance with our regulatory obligations and reviewing the quality of our advice.

Information may be transmitted normally over the Internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information that passes between us, and you should consider the risk of this. Once we receive your information, we make our best effort to ensure its security on our systems. Where we have given (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Use of 'cookies'

Like many other websites, the kingswoodfp.com website uses cookies. 'Cookies' are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. They collect statistical data about your browsing actions and patterns and do not identify you as an individual. For example, we use cookies to store your country preference. This helps us to improve our website and deliver a better more personalised service.

It is possible to switch off cookies by setting your browser preferences. Turning cookies off may result in a loss of functionality when using our website.

Profiling

When you visit our website we use a cookie to assign you a randomly generated unique identifier. We log your activity on our websites against this identifier in our databases. Once in our databases, this information will be added to your user profile and we use this data to monitor your activity on our website.

Links to other websites

Our website may contain links to other websites run by other organisations. This privacy policy applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites, even if you access them using links from our website.

In addition, if you linked to our website from a third-party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third-party site and recommend that you check the policy of that third-party site.

Transferring your information outside of Europe

As part of the services offered to you through our website, the information which you provide to us may be transferred to countries outside the European Union ("EU"). By way of example, this may happen if any of our servers are from time to time located in a country outside of the EU. These countries may not have similar data protection laws to the UK. By submitting your personal data, you are agreeing to this transfer, storing or processing. If we transfer your information outside of the EU in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this Policy.

If you use our services while you are outside the EU, your information may be transferred outside the EU in order to provide you with those services.

Right to complain

If you believe that we are not holding your information correctly or are unhappy at any dealings with us regarding your information, you may complain to the Information Commissioners Office either via its website <https://ico.org.uk/concerns> or by calling 0303 123 1113.

Review of this Policy

We keep this Policy under regular review. This Policy was last updated in January 2021.