



Our Privacy Policy – your rights, your information and how we use it

Covington's Financial Service Limited is committed to protecting your personal information.

Our Privacy Policy contains important information about what personal details we collect; what we do with that information; who we may share it with and why; and your choices and rights when it comes to the personal information you have given us.

We may need to make changes to our Privacy Policy; so please check our website for updates from time to time. If there are important changes such as changes to where your personal data will be processed; we will contact you to let you know.

This version of our Privacy Policy was last updated **March 14 2018**.

Who we are

We are Covington's Financial Service Limited. We are Wealth Managers and Financial Advisers.

How to contact us

If you have any questions about our Privacy Policy or the information we collect or use about you, please contact;

FAO Data Protection Officer
Covington's Financial Service Limited,
F3, 44 Europa Business Park,
Bird Hall Lane,
Cheadle Heath
Cheshire
SK3 0XA

Email: dpofficer@covingtons.co.uk

Information we collect and use

Information about you that we collect and use includes:

- Information about who you are e.g. your name, date of birth and contact details
- Information connected to your product or service with us e.g. your bank account details
- Information about your contact with us e.g. meetings, phone calls, emails / letters
- Information that is automatically collected e.g. via cookies when you visit one of our websites
- Information classified as ‘sensitive’ personal information e.g. relating to your health, marital or civil partnership status. This information will only be collected and used where it’s needed to provide the product or service you have requested or to comply with our legal obligations
- Information you may provide us about other people e.g. joint applicants or beneficiaries for products you have through us
- Information on children e.g. where a child is named as a beneficiary on the policy taken out by a parent or guardian on their behalf. In these cases, we will collect and use only the information required to identify the child (such as their name, age, gender)

What are cookies?

A cookie is a small file – it’s saved onto your computer or other device when you visit our website.

Cookies store small pieces of information. For example - they will remember you've visited our website or performed a certain action.

We use cookies to help us improve your experience when you visit our website. For example, a cookie might store information so you don't have to keep entering it.

Cookies also let us know which pages of our website you visited; they help us develop and market our products and services. They also help us track sales.

- Persistent cookies - these stay valid, and will work until their expiry date (unless you delete them before they expire)
 - Session cookies - these expire when you close your web browser
- Covington’s Financial Service Limited operates different platforms and one website, where we use, store and process your information in a way that is specific to that application. As a consequence we have many different cookie policies and these can be accessed by clicking on the ‘Privacy Policy’ link at the foot of each webpage.

Where we collect your information

We may collect your personal information directly from you, from a variety of sources, including:

- an application form for a product or service
- phone conversations with us
- emails or letters you send to us
- meetings with one of our financial advisers
- registering for one of our events e.g. retirement events or webinars
- participating in research surveys to help us understand you better and improve our products and services
- our online services such as websites, social media and mobile device application ('Apps')

We may also collect personal information on you from places such as business directories and other commercially or publicly available sources e.g. to check or improve the information we hold (like your address) or to give better contact information if we are unable to contact you directly.

What we collect and use your information for

We take your privacy seriously and we will only ever collect and use information which is personal to you where it is necessary, fair and lawful to do so. We will collect and use your information only where:

- you have given us your permission/consent to send you information about products and services offered to selected third parties we have chosen to work with which we believe may be of interest and benefit to you
- it's necessary to provide the product or service you have requested e.g. if you wish to invest in one of our pension or savings products, we will require some personal information including your name, address, date of birth, bank account details
- it's necessary for us to meet our legal or regulatory obligations e.g. to send you Annual Statements, tell you about changes to Terms and Conditions or for the detection and prevention of fraud
- it's in the legitimate interests of Covington's Financial Service Limited e.g. to deliver appropriate information and guidance so you are aware of the options that will help you get the best outcome from your product or investment; where we need to process your information to better understand you and your needs so we can send you more relevant communications about the products you have with us and to develop new products and services; where we use artificial intelligence or computer algorithms to improve the products and services offered to you

- it's in the legitimate interests of a third party e.g. sharing information with your employer's adviser for the governance of a pension scheme of which you are a member

If you do not wish us to collect and use your personal information in these ways, it may mean that we will be unable to provide you with our products or services.

We sometimes use systems to make automated decisions based on personal information we have - or are allowed to collect and use from others – about you. These automated decisions can affect the products, services or features we offer you now or in the future. We use automated decisions in the following ways:

- Tailoring products and services e.g. placing you in groups with similar customers to make decisions about the products and services we may offer you to help meet your needs
- When designing and enhancing our online services to help meet your requirements for ongoing guidance and support

Who we may share your information with

We may share your information with third parties for the reasons outlined in 'What we collect and use your information for.'

These third parties include:

- Your adviser or employer
- Companies we have chosen to support us in the delivery of the products and services we offer to you and other customers e.g. research, consultancy or technology companies; or companies who can help us in our contact with you, for example an internet service provider
- Our regulators and Supervisory Authority e.g. the Financial Conduct Authority (FCA), the Information Commissioner's Office for the UK (the ICO)
- Law enforcement, credit and identity check agencies for the prevention and detection of crime
- HM Revenue & Customs (HMRC) e.g. for the processing of tax relief on pension payments or the prevention of tax avoidance

We will never sell your details to someone else. Whenever we share your personal information, we will do so in line with our obligations to keep your information safe and secure.

Where your information is processed

The majority of your information is processed in the UK and European Economic Area (EEA).

However, some of your information may be processed by us or the third parties we work with outside of the EEA, including countries such as the United States, New Zealand and India.

Where your information is being processed outside of the EEA, we take additional steps to ensure that your information is protected to at least an equivalent level as would be applied by UK / EEA data privacy laws e.g. we will put in place legal agreements with our third party suppliers and do regular checks to ensure they meet these obligations.

How we protect your information

We take information and system security very seriously and we strive to comply with our obligations at all times. Any personal information which is collected, recorded or used in any way, whether on paper, online or any other media, will have appropriate safeguards applied in line with our data protection obligations.

Your information is protected by controls designed to minimise loss or damage through accident, negligence or deliberate actions. Our employees also protect sensitive or confidential information when storing or transmitting information electronically and must undertake annual training on this.

Our security controls are aligned to industry standards and good practice; providing a control environment that effectively manages risks to the confidentiality, integrity and availability of your information.

How long we keep your information

We will keep your personal information only where it is necessary to provide you with our products or services while you are a customer.

We may also keep your information after this period but only where required to meet our legal or regulatory obligations. The length of time we keep your information for these purposes will vary depending on the obligations we need to meet.

Your individual rights

You have several rights in relation to how Covington's Financial Service Limited uses your information. They are:

Right to be informed

You have a right to receive clear and easy to understand information on what personal information we have, why and who we share it with – we do this in our Privacy Policy and privacy notices.

Right of access

You have the right of access to your personal information. If you wish to receive a copy of the personal information we hold on you, you may make a data subject access request (DSAR).

Right to request that your personal information be rectified

If your personal information is inaccurate or incomplete, you can request that it is corrected.

Right to request erasure

You can ask for your information to be deleted or removed if there is not a compelling reason for Covington's Financial Service Limited to continue to have it.

Right to restrict processing

You can ask that we block or suppress the processing of your personal information for certain reasons. This means that we are still permitted to keep your information – but only to ensure we don't use it in the future for those reasons you have restricted.

Right to data portability

You can ask for a copy of your personal information for your own purposes to use across different services. In certain circumstances, you may move, copy or transfer the personal information we hold to another company in a safe and secure way. For example, if you were moving your pension to another pension provider.

Right to object

You can object to Covington's Financial Service Limited processing your personal information where: it's based on our legitimate interests (including profiling); for direct marketing (including profiling); and if we were using it for scientific/historical research and statistics.

Rights related to automatic decision making including profiling

You have the right to ask Covington's Financial Service Limited to:

- give you information about its processing of your personal information
- request human intervention or challenge a decision where processing is done solely by automated processes
- carry out regular checks to make sure that our automated decision making and profiling processes are working as they should.

How to make a complaint

We will always strive to collect, use and safeguard your personal information in line with data protection laws. If you do not believe we have handled your information as set out in our Privacy Policy, please visit our [Contact us](#) page, select 'Make a complaint' and we will do our utmost to make things right. If you are still unhappy, you can complain to our Supervisory Authority.

<https://ico.org.uk/>