

**Harrington & Horne Financial Services are committed to protecting and respecting your privacy. Looking after your personal information that we collect and details of your dependents/beneficiaries, scheme members, trustees is our top priority and we want you to be confident that your information is in safe hands. So, we've developed this Privacy Statement to let you know:**

- how and why we collect personal information;
- what we do with it;
- when and why we share it with other organisations, including the types of organisations involved;
- how long we'll keep it for; and
- the rights and choices you have with regards to your personal information.

Harrington & Horne Financial Services Ltd (H&HFS), registered office is: 31 Southdown Avenue, London, W7 2AG. Registered in England & Wales 4589122 we are authorised and regulated by the Financial Conduct Authority (FCA). Our Financial Conduct Authority Registered number is 575251.

#### **Contact us**

If you have any questions about this notice or data protection, please contact our Data Protection Controller.  
Data Protection Controller  
31 Southdown Avenue  
London  
W7 2AG  
Email: [info@harringtonandhorne.co.uk](mailto:info@harringtonandhorne.co.uk)

#### **How and why we obtain personal information about you**

You, or someone representing you, for example, your employer or personal representative, may give us information about you during a face to face meeting, by completing forms (paper versions or electronic) via social media platforms or by contacting us by phone, email or otherwise.

Depending on the circumstances, the personal information we gather about you may include:

- your name;
- address;
- date of birth;
- plan number/s;
- gender;
- email address;
- phone number;
- financial information;
- medical information; and
- any further personal information required as part of our review or application process.

You can find additional information on the more common ways we collect personal information and why below:

#### **Application forms**

Personal information is collected through our initial assessment, application and review processes, to enable us to verify your identity, and, where appropriate allow a plan/mortgage/investment to be set up. We'll also use your personal information to provide ongoing administration of your financial planning, for example to, issue yearly statements, review your attitude to risk and inform and manage, where appropriate, product renewals and so on. We need this information to carry out our obligations and to provide you with the products and services under the terms of your contract with us. Without this we wouldn't be able to provide you with a financial advice service.

### **Phone calls**

We'll ask you for some personal details to identify you when you call us and to allow us to confirm that you're the owner or representative of any particular plans/products. We do not accept client orders by phone. All instructions must be confirmed in writing to avoid possible disputes, prior to any action being undertaken.

### **Direct marketing**

If you, or the business you work for, currently receive one or more of our products or services, then you will automatically receive our marketing communications unless you have previously opted-out. We may use the information we've collected about you to send you marketing offers and news about our products and services using various channels such as mail, phone, email and SMS. However, if you would prefer not to receive any communications or would like to tailor the way we contact you, please contact us by writing to or sending an email to our Data Controller. We do not sell or provide your personal information to organisations outside of Harrington & Horne Financial Services Ltd for marketing purposes.

### **Publicly available information**

We may use your information for statistical or regulatory reporting purposes or for testing our systems. If we do this your personal information will be anonymous so that you can't be identified. Our data security policies mean that we hold all personal information securely and limit access to those who need to see it.

## **Sharing your personal information**

### **Service & product providers**

We work with carefully selected providers that carry out certain functions and product providers on our behalf. These include companies that help us with:

- technology services;
- product providers;
- regulatory organisations

We only share the appropriate level of personal information necessary to enable us to offer our service and comply with regulatory requirements.

### **Other organisations and third parties**

It's sometimes necessary to disclose your personal information or to add to it from other sources. These other sources may include, the trustees or administrators of a trust or scheme or someone officially acting on your behalf (so long as the appropriate authority is in place).

For example, if you're an employee in a group personal pension or group stakeholder pension scheme, and your employer would like to change the financial adviser looking after the scheme, we need to share information with the new financial adviser. We'll only do this if we receive written authorisation from your employer.

### **Auto Enrollment Schemes**

If you have an Auto Enrollment scheme set up through your employer via Harrington & Horne, your scheme adviser may provide the scheme with information about you, as received from your employer. This is the information given to us to set up and administer your plan and for our advisers to communicate with you about your plans and any relevant regulatory or employer changes. This will continue until such time that you leave your employer unless you tell us otherwise

### **Financial Crime Prevention**

Under Anti-Money Laundering Regulations, we are required to obtain sufficient evidence to verify the identity and address for all parties to each transaction before we can act on our behalf or process the application.

We may disclose your information to licensed credit reference and/or fraud prevention agencies to help make financial or insurance proposals for you and anyone you're linked with financially or other members of your household.

Our enquiries or searches may be recorded and credit reference agencies may supply us with financial information. We may also use these agencies to complete checks that are designed to verify your identity or bank details.

If false or inaccurate information is provided and fraud is identified, details will be passed to fraud prevention agencies. Law enforcement agencies may access and use this information

### **Additional data sharing obligations**

Other than the circumstances detailed above, we won't disclose your personal information to any third parties, except:

- to the extent that we're required to do so by law, by a government body or by a law enforcement agency, or for crime prevention purposes (including financial crime protection and credit risk reduction);
- when protecting your interests or the interests of other individuals or for reasons of substantial public interest;
- in connection with any legal proceedings (including prospective legal proceedings);
- in order to establish or defend our legal rights;
- in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets; or
- if we, or substantially all of our assets, are acquired by a third party, we may disclose your personal data to that third party in connection with the acquisition.

### **Retention of personal information**

In most circumstances, we'll keep your personal information for the lifetime of your plan or product and up to seven years after your relationship with us ends, for example, if you move your plan to another provider or you settle your benefits. This is to ensure that we comply with our retention obligations, as set out by the Financial Conduct Authority (FCA) and other regulatory and legislative requirements.

In very limited circumstances, we're required to keep some specific information for longer, for example, pension transfer information, but we regularly review our retention obligations to ensure we don't keep personal information longer than we're legally obliged to.

### **Your rights**

You have a number of rights under the Data Protection laws, including:

- the right to request a copy of the personal information we hold on you. When you request this information, this is known as making a Subject Access Request (SAR). In most cases, this will be free of charge, however in some limited circumstances, for example, repeated requests for further copies, we may apply an administration fee;
- the right to have personal information we hold about you transferred securely to another service provider in electronic form;
- the right to have any inaccurate personal information corrected;
- the right to have any out of date personal information deleted once there's no business need or legal requirement for us to hold it;
- the right to object or restrict some processing, in limited circumstances and only when we don't have legitimate grounds for processing your personal information;
- the right to object to your personal information being used to send you marketing material. As mentioned above, we'll only send you marketing material where you've given us your consent to do so. You can remove your consent at any time; and
- To exercise any of these rights, please contact our Data Protection Controller.

### **Making a complaint**

If you believe we haven't processed your personal information in accordance with our Data Protection obligations, and that you've been affected by our non-compliance, you can make a complaint to us by contacting our Data Protection Controller.

If you're not satisfied with our response, you can raise a complaint with the Information Commissioner's Office, the UK's independent authority set up to enforce the Data Protection Regulations.

## Security

We're committed to ensuring your information is protected and held securely. However, the internet is not a secure medium and we can't accept responsibility for the security of an email during transmission or for non-delivery of that email.

We've put security policies, rules and technical measures in place to protect the personal data that we have under our control from:

- unauthorised access;
- improper use or disclosure;
- unauthorised modification, and
- unlawful destruction or accidental loss.

All our employees and service providers who have access to personal information, are obliged to protect it and keep it confidential.

## Changes to this privacy statement

We keep our privacy notice under regular review. This privacy statement was last updated on 4th October 2018