

# Privacy Policy



We respect your privacy and protecting your information is paramount. We ask that you read this privacy policy 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 how to contact us and supervisory authorities in the event you have a complaint.

Our privacy policy is also available on our website, [www.Lowes.co.uk](http://www.Lowes.co.uk). The privacy policy is updated from time to time, so please check our website regularly to ensure you are fully up-to-date with how we deal with the information you have provided to us.

We recognise that our privacy policy may contain terms with which you may not be familiar. To try to help you understand some of these terms you can access a Glossary of terms at [www.Lowes.co.uk/privacy-policy](http://www.Lowes.co.uk/privacy-policy).



## Who we are

Lowes Financial Management Limited collects, uses and is responsible for certain personal data about you. When we do so we are required to comply with the EU General Data Protection Regulation. The data controller responsible for handling your personal information is Lowes Financial Management Limited.

Lowes Financial Management Limited is a limited company registered in England and Wales whose registered number is 01115681 and whose registered address is Fernwood House, Clayton Road, Jesmond, Newcastle upon Tyne, NE2 1TL.

Lowes Financial Management Limited is registered with the Information Commissioners Office under number Z5427259.

You can check our registration on the Data Protection Public Register by visiting: <https://ico.org.uk/esdwebpages/search>.

When we mention “Lowes “we”, “us” or “our” we are referring to Lowes Financial Management Limited. When we mention “you” and “your” we are referring to each natural or legal person who uses our services.

Lowes is authorised and regulated by the Financial Conduct Authority. Our Financial Services Register number is 114650.



## 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 by telephone, via our website, by e-mail or in face to face meetings. This includes information you provide when you subscribe to our services, participate in discussion boards or other social media functions on our website, provide us with feedback, participate in surveys, and when you report a problem with our website. The information you give us may include the following:

- Your name and title, address, email address, phone number and date of birth.
- Employment and job application details, e.g. employment history, equality monitoring information, qualifications.
- Lifestyle information.
- Photographic identification.
- In certain circumstances, your and others' signature(s), National Insurance number(s), financial details such as bank account details and details of any relevant sanctions or similar restrictions.
- In certain circumstances, data relating to health (including disabilities) and other 'special category personal data'.
- The content of any enquiry submitted over our website.
- Any other personal data we collect (such as the client reference number which may be assigned to you) in the context of our work for our clients or in the course of operating our business. This may include Fact Find data such as details of your assets and liabilities, income and expenditure and general information regarding your financial situation including existing protection, pension, savings and investments and estate planning provision.
- Details of your dependants and/or beneficiaries under a policy.

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**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 policy and if they have any concerns please contact us in one of the ways described on page 4 and 8.**

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We may monitor or record telephone conversations or other communications between you and us. We will use these recordings or transcripts of them to check your instructions to us, analyse, assess and improve our services to clients for training and quality purposes and for the purposes of investigating any complaint you may make, or as evidence in any dispute or anticipated dispute between you and us.



## 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 product providers: - (Product details)
- From identification and verification checking agencies: - (identity information & sanction check information)



## How we use your personal data

We use information that you give to us or we collect from other third parties on your behalf as part of our services. It may be necessary to disclose your data to third parties to ensure the smooth provision to you of services and information you request. Your data may be disclosed to other entities as described below and the table below sets out the lawful bases upon which we collect and use your personal data, the third parties who we may share your personal data with and how we use your personal data.

Rationale/Reason for Processing	Lawful Basis for Processing	Third party recipients linked to that activity
<ul style="list-style-type: none"> <li>To build up a picture of you and your interests so that the services we provide to you are suitable for you.</li> <li>To communicate with you in person, by telephone, mail, email, text (SMS) message, or instant messaging and to administer your account and relationship with us.</li> <li>To apply for products on your behalf.</li> <li>To apply for and/or seek quotations for protection and/or general insurance products on your behalf.</li> <li>To enable us to discharge our services to you.</li> <li>To allow us to make any reasonable adjustments to safeguard your specific needs.</li> <li>To make a referral for business tax return and tax planning services.</li> <li>To make a referral for will writing, estate planning and review services.</li> </ul>	Performance of a contract Consent	Product providers Business partners, suppliers and subcontractors Accountants, solicitors and legal services
<ul style="list-style-type: none"> <li>To enable us to discharge our services to you and for other related purposes including updating and enhancing client records, legal and regulatory, identity authentication and crime and fraud prevention.</li> <li>To retain records of any services or advice provided to you by us in order to defend potential legal claims or complaints.</li> </ul>	Legitimate Interest	External supplier(s) of data storage and data hosting services to retain records on our behalf Fraud prevention agencies Regulatory authorities including the FCA, ICO and HMRC Other third parties including our auditors or insurers
<ul style="list-style-type: none"> <li>To provide you with details of products and services from us that may be of interest to you in accordance with your preferences. For more information see 'Marketing' on page 4.</li> </ul>	Legitimate Interest Consent	

We may share your personal information with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries. We may disclose your personal information to third parties if Lowes or substantially all its assets are acquired by a third party, in which case personal data held by us about our clients will be one of the transferred assets.

We are under a duty to disclose or share your personal data to comply with any legal obligation, or to enforce or apply our Terms and other agreements; or to protect the rights, property, or safety of Lowes, our clients or others.

This includes exchanging information with other companies and organisations for the purposes of fraud and crime prevention.

Your personal data will not be sold, distributed or leased to third party organisations unless we are required to do so by law, or we have received your consent to do so.



## 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.
- *health information and lifestyle information* such as health conditions or illnesses that affect the ability to carry out day to day tasks or life events such as bereavement or relationship breakdown which may lead to additional support requirements.

In addition to the lawful basis for processing this information set out in the table on page 3, 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 defense 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 have a legitimate interest in undertaking these marketing activities to help us improve the products and services we provide to you and to keep you up to date with relevant products and services.

We offer you the opportunity to receive information from us. If you have chosen to receive direct marketing information from us, we will normally send this by mail if we have your address but may choose to contact you via other methods such as email or telephone. If you would like us to stop sending direct marketing to you, we offer simple ways to do this. Whenever you receive direct marketing you will be told how to unsubscribe.

If you consent to receive marketing communications (please see below), you can tell us that you do not wish to receive any more by contacting us, with your full name, address and other contact details (to enable us to find your records):



By phone: 0191 281 8811



By email: [enquiry@Lowes.co.uk](mailto:enquiry@Lowes.co.uk)



By Post: Lowes Financial Management Limited, Fernwood House, Clayton Road, Jesmond, Newcastle upon Tyne, NE2 1TL

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

How long we keep your information will depend on the purpose for which we use it. We will only retain your information for as long as is necessary for those purposes and in accordance with our statement of service.



## Transfer of your information out of the EEA

If we need to share your personal data with a recipient outside the European Economic Area (“EEA”) (e.g. a professional advisor or third party engaged by us or you as part of our work under an engagement letter), for example where the transfer is necessary to perform a contract in place with you, we will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.



### To be informed

You have a right to be informed about the collection and use of your personal data. Our privacy policy provides information explaining our purposes for processing your personal data, our retention periods for that personal data, and who it will be shared with. We call this “privacy information”. We will regularly review, and where necessary, update our privacy policy. Please check our website regularly to ensure you are fully up-to-date with how we deal with the information you have provided us.

### **To access personal data**

You have the right to access your personal data and supplementary information. You are entitled to be told by us whether we or someone else on our behalf is processing your personal information; what personal information we hold; details of the purposes for the processing of your personal information; and details of any third party with whom your personal information has been shared.

You can access the personal information we hold on you by writing to: Data Protection Officer, Lowes Financial Management Limited, Fernwood House, Clayton Road, Jesmond, Newcastle upon Tyne, NE2 1TL. You can also contact us by email at [enquiry@Lowes.co.uk](mailto:enquiry@Lowes.co.uk). We will ask you to provide proof of identity before we show you your personal information – this is so we can prevent unauthorised access.

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. An initial request for your personal data will be responded to free of charge.

Please note: For any access request made that is deemed excessive or especially repetitive, we may charge a 'reasonable fee' for meeting that request. Similarly, we may charge a reasonable fee to comply with requests for further copies of the same information. (That fee will be based upon the administrative costs of providing the information). Where a fee is necessary, we will inform you before proceeding with your request.

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

You can ask that we rectify any information about you which is incorrect or complete any personal data if it is incomplete. 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. We will stop processing personal data for direct marketing purposes as soon as we receive an objection and this request will be processed free of charge.

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

You have the right to data portability which allows you to obtain and reuse your personal data for your own purposes across different services. This right may apply in the following circumstances:

- you have provided the personal data to us;
- where the processing has been carried out based on your consent or for the performance of a contract; and
- where the processing is carried out by automated means.

If you would like to request a transfer of data to another organisation, you can ask us to do so either verbally or in writing. We will respond to a request without undue delay and within one calendar month of receipt.

**Please note:** We may be unable to transmit the data directly to another organisation if this is not technically feasible. This right does not apply to any personal data which we hold or process outside automated means.

### **To contest decisions based on automatic decision making**

If we made a decision about you based solely by automated means (i.e. with no human intervention), and the decision made by us produces a legal effect concerning you, or significantly affects you, you may have the right to contest that decision, express your point of view and ask for a human review. These rights do not apply where we are authorised by law to make such decisions and have adopted suitable safeguards in our decision making processes to protect your rights and freedoms.

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

If you are not satisfied with the level of information provided in this privacy policy, 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 Data Protection Officer at enquiry@Lowes.co.uk or by post to Lowes Financial Management Limited, Fernwood House, Clayton Road, Jesmond, Newcastle upon Tyne, NE2 1TL;
- 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 license 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. **Please note where you have a partner residing at the same address, who is also a client of Lowes Financial Management Limited with the same adviser, your accounts will be considered as one for privacy purposes. If you wish to keep your account information confidential from each other you will need to inform us in writing and separate advisers will be appointed.**

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.



### Complaints

We will always aim to be respectful, relevant and appropriate in our communications with you. If at any time you do not think that we are processing your personal data appropriately, please contact us straight away to let us know.



### 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 ('ICO'). 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 Officer if you have any questions about this privacy policy or the information we hold about you. If you wish to contact our Data Protection Officer, please send an email to [enquiry@Lowes.co.uk](mailto:enquiry@Lowes.co.uk) or write to Lowes Financial Management Limited, Fernwood House, Clayton Road, Jesmond, Newcastle upon Tyne, NE2 1TL.