



PRIVACY POLICY

Overview

Cumberland Place Financial Management Ltd 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.

Our Cookie Policy forms part of our Privacy Policy. When you browse our websites we use cookies to store information about how you use these websites in order to improve the quality of service provided to you. To understand what type of cookies we use and how these work when you use our websites read our [Cookie Policy](#).

Contents

Who we are	3
How to contact us.....	3
Information we collect and use.....	3
Where we collect your information	4
Why we collect and use your information	4
Who we may share your information with.....	5
Where your information is processed	5
How we protect your information	6
How long we keep your information	6
Your individual rights	6
How to make a complaint.....	7

Who we are

Cumberland Place Financial Management Ltd is wholly owned by 1825 which is part of the Standard Life Aberdeen Group; one of the world's largest investment companies.

This Privacy Policy applies to 1825 and its subsidiaries (the legal trading companies that manage the services we offer to our UK customers), incorporating:

Baigrie Davies & Company Limited, Jones Sheridan Financial Consulting Limited, Pearson Jones plc, Standard Life Client Management Limited, The Munro Partnership Limited, Cumberland Place Financial Management Ltd and Fraser Heath Financial Management Ltd.

How to contact us

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

Compliance Officer, Tony Moss,
Cumberland Place Financial Management Ltd,
6th Floor, Thavies Inn House,
3-4 Holborn Circus,
London,
EC1N 2HA

Email: info@cumberlandplace.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 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 if you visit one of our offices e.g. visual images collected via closed circuit television (CCTV)
- Information classified as 'sensitive' personal information e.g. relating to your health
- Information you may provide us about other people e.g. joint applicants or beneficiaries for services you have with us or products we advise on
- Children are not able to buy products and services from us. However, a parent or guardian can, and a child can also be named as a beneficiary on some funds. In these cases, we collect and use limited personal information to identify the child (such as their name, age, gender).

Where we collect and use sensitive personal information, 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, and where we have also obtained your explicit consent to process such information.

Where we collect your information

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

- Appointments with one of our financial advisers
- An application form for a product or service
- Phone conversations with us
- Emails or letters you send to us
- Registering for one of our events
- Participating in research surveys to help us understand you better and improve our services
- Our online services such as websites, social media and mobile device applications ('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.

Why we collect and use your information

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 if we are able to satisfy one of the lawful processing conditions set out in the data protection laws. This will be the case where:

- It's necessary to provide the product or service you have requested e.g. if you wish to invest in one of our funds or products we will require some personal information which may include your name, address, date of birth, and bank account details. To provide you with advice and a financial plan tailored to your specific needs to help you get the best outcome, we may also require you to share some sensitive information relating to your health and lifestyle.
- 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 Cumberland Place i.e.:
 - To deliver appropriate information and guidance [including educational content and updates] so you are aware of further options available to you to support a better outcome from your product or investment with Cumberland Place
 - Where we need to process your information to better understand you and your needs so we can send you more relevant communications about the services you have with us
 - To develop new services.

Where the processing is in our legitimate interests, we will always conduct an assessment to ensure that this use of your personal information is not excessive or unnecessary or otherwise more intrusive than it needs to be.

- You have given us your permission [consent] to use your information. For example, if we are collecting and using your sensitive personal information or to send you information about products and services offered by other parts of Standard Life Aberdeen plc and / or selected third parties we have chosen to work with which we believe may be of interest and benefit to you. You can withdraw your consent at any time by emailing: info@cumberlandplace.co.uk or by using our contact us form <http://www.cumberlandplace.co.uk/contact/>

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 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 services or features we offer you now or in the future. We use automated decisions in the following ways:

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

Who we may share your information with

We may share your information with third parties for the reasons outlined in ‘Why we collect and use your information’. We will share your information with:

- Other parts of Standard Life Aberdeen plc who support us in the provision of the service agreed with you
- Credit and identity check agencies for ID verification and credit reference checks
- Companies we have chosen to support us in the delivery of the products and services we offer to you and other customers e.g. financial services providers, research, consultancy or technology companies; or companies who can help us in our contact with you, for example an internet service provider
- Our regulators; including the Financial Conduct Authority (FCA) and the Information Commissioner’s Office for the UK (the ICO)
- Law enforcement and other appointed agencies who support us (or where they request the information) in the prevention and detection of crime; and HM Revenue & Customs (HMRC) for the processing of tax relief on pension payments or the prevention of tax avoidance.

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.

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

To provide you with the service agreed and meet our legal and regulatory obligations, we keep your personal information and copies of records we create (e.g. calls with us) while you are a client of ours.

Even when you no longer have a relationship with us, we are required to keep information for different legal and regulatory reasons. The length of time will vary and we regularly review our retention periods to make sure they comply with all laws and regulations.

Your individual rights

You have several rights in relation to how Cumberland Place Financial Management Ltd 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 Cumberland Place Financial Management Ltd 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 Cumberland Place Financial Management Ltd 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 Cumberland Place Financial Management Ltd 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.

If you require any more information on your rights and how to exercise them, you can email:

info@cumberlandplace.co.uk or contact us <http://www.cumberlandplace.co.uk/contact/>

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 <http://www.cumberlandplace.co.uk/contact/> and we will do our utmost to make things right.

While we hope that we can resolve any complaints for you, you do have the option to complain to the ICO (whether or not you have exhausted our complaints procedure).

The ICO's contact details are: <https://ico.org.uk/>