



# Privacy Policy (Client Data)

## Who we are

We are Contengo Ltd, a company that provides online software and data- processing services to professional Financial Advisers and Wealth Managers to enable them to report on how they are managing your investments and – in some cases – to ask for and record your approval to go ahead with recommendations that they are making.

For data protection purposes Contengo Ltd acts as a “Data Processor” – the “Data Controller” responsible for your data is your Financial Adviser: all queries and requests in relation to personal data held by Contengo Ltd should be addressed to them in the first instance.

The person responsible for this policy within Contengo is our Chief Technology and Data Protection Officer, Charles Southey, who can be contacted by email to [data.protection@contengo.net](mailto:data.protection@contengo.net), or via your Financial Adviser.

## Why this policy exists

This privacy policy aims to explain to you how Contengo Ltd:

- Complies with data protection laws and follows best practice.
- Protects your rights as someone whose investment details are recorded in our databases.
- Is open about how it stores and processes your data.
- Protects itself from the risks of a data breach.

## What data we hold about you

The exact content of the data we hold about you varies depending on where it comes from and which of our services your adviser uses, however it may include some or all of the following:

- Your name (including title), gender, address, email address and telephone number(s).
- Your National Insurance Number and Date of Birth.
- Your relationship to other persons recorded in our databases (e.g. spouse, parent etc.)
- Who your financial adviser is (individual and firm).
- Your investment goals and objectives, and your attitude to and capacity for risk.
- Copies of identifying information (e.g. passport) that your financial adviser needs to keep on file for regulatory (e.g. anti money-laundering) purposes.
- Which investment, pension and protection policies you hold (e.g. SIPPs, ISAs, Endowment Policies, Bonds, General Investment Accounts, Savings Plans, Live Insurance etc.). For these we record the name of the provider, the policy number, the policy type, the start date etc.



- Details of investments held within these policies now and in the past (i.e. the investment name, identifying code(s), number of units held, market prices and values). This includes cash amounts held within these policies in GBP or other currencies.
- Other assets you may hold or have held in the past – e.g. property, cars, directly-held shares, cash bank account etc. Information on these is limited – e.g. name & market value.
- Liabilities you may have or may have had in the past – e.g. mortgages, other loans. Information held on these is limited, e.g. name & current size of liability.
- Private documents & messages shared between you and your financial adviser.
- Investment reports and recommendations and your decisions about whether to accept or reject the recommendations.
- Dates and times of both successful and unsuccessful attempts by you (or using your username) to log into our client portal, and the network addresses (“IP addresses”) these came from.

## How your data is acquired

Your personal data processed by Contengo Ltd comes from three possible sources:

- From the investment platforms and product providers where your investments are held, using secure electronic links, on the authorisation of your Financial Adviser. Data from these sources is typically updated once per day (via an overnight feed).
- From the electronic systems (“back office” systems) used by your Financial Adviser to record details of their clients, again via a secure electronic link. Data from these systems are typically updated throughout the day.
- Manually entered or imported from a spreadsheet by your Financial Adviser or one of their team.

We may also add the ability for you to maintain some of your own data by manually entering it within the system.

## Where your data is kept

All your personal data held by Contengo Ltd is securely hosted in the UK at one of Microsoft’s two UK-based data centres. Microsoft holds the highest levels of internationally-recognised certification for secure data management in its data centres.

Access is strictly controlled through multiple layers of security.

## What we do with that data

We will only use your personal data for the following purposes:

- To generate static reports – at the request of your financial adviser – of your investment holdings and performance for the purpose of keeping you informed of these matters. These reports can be stored in the system and sent to you as printed documents or as digital documents.
- To allow you to log into your financial adviser’s client portal and see the current and/or historical value of your investments and other assets, and how these have performed

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over time.

- To allow your financial adviser and key authorised staff within their firm to periodically inspect and review your investment holdings and performance in order to make recommendations about any changes to be made.

We will occasionally also need to access your data in order to troubleshoot any problems encountered with the provision of the above services, or to test enhancements to these services, but all such access will be strictly in support of the purposes above.

We will occasionally use some of the data relating to your investments in an anonymised and aggregated form in order to generate key metrics (e.g. the total value of assets recorded on our systems) or to produce anonymised test data for product development and demonstration purposes – but this will be stripped of all information that could directly or indirectly allow this data to be identified as potentially belonging to you.

We will never allow any of your personal data to be disclosed to any third party, unless explicitly authorised by yourself (either directly to us or via your financial adviser), for any purpose whatsoever, other than when ordered to do so by a legal authority (e.g. Court of Law) having the relevant jurisdiction to enforce that order.

## How long we will keep your data

We will keep your personal data on file for as long as your Financial Adviser is contracted with us to provide reporting and data processing on your behalf.

Should the contract between ourselves and your Financial Adviser be cancelled or allowed to lapse, we will permanently delete all the data acquired under that contract.

Likewise, if you cancel your arrangement with your Financial Adviser and request that your personal data be removed we will – on their explicit instruction – permanently remove all your personal data. However we will not know to do so without an explicit request being made.

## Your rights

You have the following rights in respect of your personal data that we hold:

### Right to be informed

This privacy notice is in fulfilment of your right to be informed about how we are handling your data.

### Right of access

You have the right to access – free of charge and within a reasonable timeframe – your personal data and supplementary information held by us on your behalf. If you wish to obtain a copy of this please request it via your Financial Adviser (this is known as a “Subject Access Request”). We will respond within one month of receiving such a request.

### Right to rectification

If any of the personal data we hold is incorrect you have the right to have it corrected within one month of making such a request. However, since we are not the controller of this data, you will have to ask your Financial Adviser to make such corrections at source (e.g. in the investment platform or back-office system from whence it originated). The data that we hold for the most part originates from external sources and cannot be altered by us. If any of it can be directly corrected by us we will do so at

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the request of your Financial Adviser.

### **Right to erasure**

We must delete or remove your personal data if you request that and there is no compelling reason for its continued processing. Please be aware that if we remove your personal data from our systems it may not be possible for your Financial Adviser to continue providing the same service to you as they have done previously. Please ask your Financial Adviser if you want your personal data to be erased from our systems – we will act on their instruction.

### **Right to restrict processing**

We must comply with any request to restrict, block, or otherwise suppress the processing of your personal data. We are still permitted to store your personal data if it has been restricted, but not process it further. We must retain enough data to ensure the right to restriction is respected in the future. If you wish the processing of your personal data to be restricted, please ask your Financial Adviser – we will act on their instruction.

### **Right to data portability**

We will provide you with a copy of your data on request so that you can reuse it for your own purposes or across different services. It will be provided in a commonly used, machine-readable format, and we can send it directly to another controller if requested. If you wish to invoke this right, please ask your Financial Adviser.

### **Right to object**

You have the right to object to the way we are processing your data. We do not and never will use your data for public interest purposes, direct marketing or profiling, so objections to our use of your data for these purposes will be noted but will not result in any action on our part. However if you wish to object to our using your data in aggregated & anonymised form for statistical metrics, or for the production of anonymised test data, please inform your financial adviser.

### **Rights in relation to automated decision making and profiling**

You have additional legal rights in respect of systems that use your personal data for automated decision-making and profiling, however we do not and will not use your personal data for such purposes.

## **If you have any questions**

If you have any questions or concerns about any of the above, please contact your Financial Adviser who will pass them on to us. We will endeavour to address all such queries in a timely manner – either directly or through updates to this policy.