

Integrated Financial Arrangements Ltd

A firm authorised and regulated by the Financial Conduct Authority

IntegraLife UK Limited

A firm authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority

IntegraLife International Limited

A firm authorised and regulated by the Isle of Man Financial Services Authority



Privacy Notice – Appropriateness Questionnaire

Integrated Financial Arrangements Ltd (“IFAL”), IntegraLife UK Ltd (“ILUK”) and IntegraLife International (“ILInt”) are committed to being transparent about how your personal data is collected and used. This privacy notice explains how we use the details collected from you on our Appropriateness Questionnaire.

You should read this notice in conjunction with our Standard Privacy Notice, which can be found via <https://www.transact-online.co.uk/important-information/>. Should you require a hard copy of this, or any of our other notices, you can request one from us.

Where terms are capitalised they are defined either within this notice or within our Client Terms and Conditions.

Who we are

ILUK, IFAL and ILInt are wholly owned subsidiaries of IntegraFin Holdings plc (“IntegraFin”). The other wholly owned subsidiaries of IntegraFin are detailed in the Standard Privacy Notice. Together all the companies are referred to as “the IntegraFin Group” and the terms “we”, “us” and “our” in this document refer to the IntegraFin Group collectively.

Why we collect your personal information and how we will use it

The information collected in our Appropriateness Questionnaire is used to evaluate whether you are likely to understand the risks involved with certain investments and is necessary for us to fulfil our regulatory obligations to you as a retail client. We will rely on the necessity of processing to fulfil our legal obligations as the lawful basis for processing this data. This provision is detailed in section 1(c) of Article 6 of the General Data Protection Regulation (GDPR).

How we store and share your information

All information held by the IntegraFin Group is stored on encrypted servers or at a secure physical location. In addition, we have internal policies and controls in place to minimise the risk of your data being lost, misused, accidentally destroyed or disclosed.

Your information will be available to staff employed by any member of the IntegraFin Group. In particular, note that your data will be transmitted to our system provider, Integrated Application Development Pty Ltd (“IAD”). IAD is based in Australia and data is transmitted under an EU Model Contract. You may request a copy of this contract from us.

The only third parties we will share this information with are the Financial Conduct Authority, where required, and your Adviser.

How long we hold your information for

We will hold this information for the period for which your Portfolio is open with us and for seven years after you terminate your relationship with us. It should be noted that we are obliged by regulation to hold personal information in relation to discretionary payments from an estate to charity indefinitely.

Where you hold a pension with us, we will retain your Portfolio records indefinitely in order for us to comply with pension record keeping obligations.

Where you are linked in a group to one or more family members for the purposes of amalgamating value for the calculation of fees, your records will be kept for the longer of seven years after your Portfolio is closed or the last member of that group closes their Portfolio.

Access to your information and correction

You have the right to request a copy of the information that we hold about you. If you would like a copy of some or all of your personal information, please make a request to us either by secure email through Transact Online or in writing to our office address at 29 Clement's Lane, London, EC4N 7AE.

It is important to us to ensure that personal information held about you is accurate and up to date. You may, and we would encourage you to, ask us to correct or remove information about you which you think is inaccurate. You have the right to object to our processing of any aspect of your personal data and to request its erasure should you believe that we have no legal right to continue processing.

In some circumstances you have the right to request that we provide certain categories of your personal data to you or any third party in machine readable format.

If you believe that we have not complied with your data protection rights please contact us and we will endeavour to resolve this with you. If you remain dissatisfied you can complain to the Information Commissioner. Details of how to proceed can be found via their website, <https://ico.org.uk/concerns/>.

Note that if your complaint relates to an Offshore Bond, you should instead contact the Isle of Man Information Commissioner. Details of how to proceed can be found via their website, <https://www.inforights.im/>.

Changes to this privacy notice

We keep this privacy notice under regular review and we will make you aware of any changes.

Our Data Protection Officer is Tom Clarke, who can be contacted on (020) 7608 4900 or at dataprotection@integrafin.co.uk.

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"Transact" is operated by Integrated Financial Arrangements Ltd, 29 Clement's Lane, London, EC4N 7AE
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(Registered office: as above; Registered in England and Wales under number: 3727592)
Authorised and regulated by the Financial Conduct Authority (entered on the Financial Services Register under number: 190856)

IntegraLife UK Limited, 29 Clement's Lane, London, EC4N 7AE
Tel: (020) 7608 4900 Fax: (020) 7608 5300
(Registered office: as above; Registered in England and Wales under number: 798365)
Authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority (entered on the Financial Services Register under number: 110344)
A member of the Integrated Financial Arrangements Ltd group of companies

IntegraLife International Limited
Registered Office: Second Floor, 18/20 North Quay, Douglas, Isle of Man, IM1 4LE.
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Authorised & Regulated by the Isle of Man Financial Services Authority
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