
Privacy Notice – Offshore Bond premium

IntegraLife International (“ILInt”) is committed to being transparent about how we collect and use personal data. This privacy notice explains how we use the financial and employment information which you are providing in relation to the proposed premium for your Offshore Bond.

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

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

Who we are

ILInt is the data controller and is a wholly owned subsidiary 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

We collect employment and financial information from you in this instance in order to comply with our obligations to detect and prevent money laundering.

We will rely on the necessity of processing to fulfil our legal obligations as the lawful basis for processing the information collected from you on this form. 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 is available to staff employed by any member of the IntegraFin Group. In particular, note that:

- Your data is transmitted between the UK and the Isle of Man. The Isle of Man has been deemed by the EU Commission to have comparable data protection measures in place
- Your data is transmitted for the purposes of software support 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.

Where we transmit your data to third parties we do so under a duty of confidentiality, and those third parties are obliged to implement appropriate technical and organisational measures to ensure the security of data. The third parties we will transmit your personal data to are detailed on our Standard Privacy Notice and our Offshore Bond Privacy Notice.

How long we hold your information for

We will hold your 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 in your Transact Portfolio, 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 IntegraFin Group head 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 to do so.

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 Isle of Man Information Commissioner. Details 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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Authorised & Regulated by the Isle of Man Financial Services Authority

A member of the Integrated Financial Arrangements Ltd group of companies