

# Standard Privacy Notice

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Integrated Financial Arrangements Ltd (“IFAL”) is committed to being transparent about how we collect and use personal data. This privacy notice explains how we use the personal information collected from you in relation to your General Investment Account.

Where terms are capitalised they are defined either within this notice or within the Terms and Conditions for the Transact Wrap Service.

## Who we are

IFAL is a wholly owned subsidiary of IntegraFin Holdings plc (“IntegraFin”). The other wholly owned subsidiaries of IntegraFin are:

- IntegraFin (Australia) Pty Ltd
- IntegraFin Limited
- IntegraFin Services Limited
- IntegraLife International Limited
- IntegraLife UK Limited
- Integrated Application Development Pty Ltd
- Objective Asset Management Limited
- Objective Funds Ltd

- Objective Wealth Management Limited
- ObjectMastery (UK) Limited
- Transact IP Ltd
- Transact Nominees Limited
- Transact Trustees Limited
- Time for Advice Limited

Together all the companies are referred to as “the IntegraFin Group” and the terms “we”, “us” and “our” in this document will refer to the IntegraFin Group collectively.

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

We collect personal information from you and your Adviser to initiate a contract with you and in order to maintain and administer your Portfolio once it is open. We may also receive information about you from third parties appointed by you. We will use your personal information to:

- identify you internally and to your Adviser
- allow adherence to our contract with you
- comply with our legal obligations as an authorised financial company.

This includes checking your personal details against an automated database in order to meet our obligations relating to the prevention of money laundering, fraud or other financial crime.

We will rely on the necessity of processing to perform our contract, the necessity of processing to fulfil our legal obligations and our legitimate business interests as the lawful basis for processing the information we collect from you. These provisions are detailed in sections 1(b), 1(c) and 1(f) of Article 6 of the General Data Protection Regulation (GDPR).

Examples of our legitimate business interests include good governance, accounting, monitoring of communications, and managing and auditing business operations.

We may receive details of health conditions affecting you, either from you directly, or from your adviser. This will be in the context of Ill Health Early Retirement claims or for us to make adjustments to our services and interactions with you in order to ensure they are appropriate to your needs. We will rely on the substantial public interest basis for our processing of this data, as set out in section (g) of Article 9 GDPR.

We will not make any decisions in relation to your Portfolio solely on an automated basis.

## 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 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. Specifically, the third party organisations in question are:

- Your Adviser
- The fund managers for any investments you make within your Portfolio
- Term Deposit providers
- Equifax, C6, Worldcheck and Oracle in order to perform money laundering checks
- Crime prevention agencies where required by law
- HMRC, the Prudential Regulation Authority (PRA) and the Financial Conduct Authority (FCA) under our regulatory reporting obligations
- BACS Payaway and Bankline, our payment providers
- Financial Clarity, Fundscape, Equifax Touchstone and Calastone, who provide us with aggregated market data
- EY, KPMG and Grant Thornton, who act as our auditors
- Steve Dixon Associates, our actuaries
- Paragon, our printing and mailing outsourcer
- Shred-it, who dispose of our confidential waste
- Kelly's, who provide secure offsite storage
- Equisoft, in respect of the Pensions Dashboard Programme.

In addition to the above we have arrangements with back office service providers. A full list of these parties is available on request.

We may contact you to invite you to review any services and/or products you received from us. We use an external company, Trustpilot A/S ("Trustpilot"), to collect your feedback which means that we will share your name, email address and reference number with Trustpilot for this purpose. If you want to read more about how Trustpilot process your data, you can find their Privacy Policy [here](#). We may also use such reviews in other promotional material and media for our advertising and promotional purposes.

## 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 start an application for a Portfolio with us, but do not complete that process, we will hold any information you have submitted to us for six months.

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 via Transact Online or in writing to 4th Floor, 2 Gresham Street, London, EC2V 7AD.

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 that 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 can be found via their website, <https://ico.org.uk/concerns>.

## 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](mailto:dataprotection@integrafin.co.uk)



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