

Privacy Notice – ISA

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 Individual Savings Account (“ISA”), Junior ISA (“JISA”) or Lifetime ISA (“LISA”). In this document the term “ISA” will refer to all types of ISA collectively.

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

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.

If you are opening a Junior ISA you will need to share the information contained in this notice with the applicable minor.

Who we are

IFAL is a wholly owned subsidiary of IntegraFin Holdings plc (“IntegraFin”). The other wholly owned subsidiaries of IntegraFin are detailed in our Standard Privacy Notice. 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

In order to administer your Portfolio we collect certain information on your Portfolio application form. Our Standard Privacy Notice explains how that data is used.

We collect the additional information on our ISA application form or ISA transfer form in order to maintain and administer an ISA within your Portfolio.

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 to manage and audit business operations. We will not make any decisions in relation to your ISA 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. The third parties we will transmit your personal data to are detailed on our Standard 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 with us, we will retain your Portfolio records indefinitely 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 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.



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