

Privacy Notice – Trust Settlor

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 personal information we hold about you.

You should read this notice in conjunction with our Standard Privacy Notice, which can be found via www.transact-online.co.uk/important-information. If the trust holds a Transact Onshore Bond or Transact Offshore Bond, you should also read the privacy notice specific to these in conjunction with this notice. Should you require a hard copy of these, 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 Terms and Conditions for the Transact Wrap Service.

Who we are

IFAL, ILUK 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

We have collected your personal information from the trust deed that was submitted to us along with the application to open a trust Portfolio. We will use this to verify your identity to comply with our obligations under anti-money laundering regulations.

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 interest as the lawful basis for processing the information collected from you on this form. 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.

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 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.

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. In this case your personal information will only be shared with Equifax, C6, Worldcheck and Oracle in order to perform money laundering checks.

How long we hold your information for

We will hold your information for the period for which the trust Portfolio is open with us and for seven years after the relationship with us is terminated.

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 email (dataprotection@integrafin.co.uk) 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 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.

If you believe that the organisation has 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 or the Isle of Man Information Commissioner (if you hold an Offshore Bond), details of which are below:

- Information Commissioner: ico.org.uk/concerns
- Isle of Man Information Commissioner: 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, 4th Floor, 2 Gresham Street, London EC2V 7AD | Tel: (020) 7608 4900 | Email: info@transact-online.co.uk | Web: www.transact-online.co.uk | (Registered office: as above; Registered in England and Wales under number: 03727592) | Authorised and regulated by the Financial Conduct Authority (entered on the Financial Services Register under number: 190856)

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