

Privacy Notice – Offshore Bond

IntegraLife International (“ILInt”) 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 Offshore Bond.

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

You should read this notice in conjunction with our Standard Privacy Notice, which can be found via 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.

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 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 the Portfolio application form. Our Standard Privacy Notice explains how that data is used.

We collect the additional information on our Offshore Bond application form to initiate a contract with you and in order to maintain and administer your Offshore Bond once it is open.

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 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 will not make any decisions in relation to your Offshore Bond 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 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 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. In addition to those third parties identified on our Standard Privacy Notice, we will transmit your personal data to the following organisations where you hold an Offshore Bond:

- Isle of Man Treasury
- Isle of Man Financial Services Authority
- Royal Bank of Scotland International, who provide policy administration services
- Storall, who provide secure offsite storage.

In addition, we will supply your information to law enforcement agencies where required.

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 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 the 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 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 Isle of Man Information Commissioner. Details can be found via their website, 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