



Privacy Policy 2009

Copyright Notice:

This document is the property of Investment Funds Direct Limited and cannot be copied, modified, or stored on a computer system without the company's consent.

Document History

Date	Version	by	Details
06.01.09	3	DHB	TCF Friends and Family approval complete

Outstanding Issues

Contents

1.	Personal Data Collection.....	4
2.	Personal Data Use	4
3.	Disclosure of Personal Data	5
4.	Keeping Data Secure	5
5.	Information Regarding Others	6
6.	Data Protection and Opting Out	6
7.	Monitoring	6
8.	Cookies	7
9.	Your Rights.....	7
10.	Advice	8
11.	Our Contact Details	8
12.	Website Disclaimer	8
13.	Website Use.....	9
14.	Website Availability	9
15.	General.....	9

1. Personal Data Collection

We take the privacy of our website users seriously. We request that you read this Privacy Policy ('the Policy') carefully as it contains important information about how we will use your personal data. For the purposes of the Data Protection Act 1998, Investment Funds Direct Limited ('we' or 'us') are the company responsible for, and controls, the processing of your personal data). This website is intended for professional adviser use only.

- 1.1. We will obtain personal data about you (such as your name, address, email, contact number, etc) whenever you complete an online form, such as the contact form or application form
- 1.2. We may also obtain other sensitive personal data about you should you volunteer it during the completion of online forms. If you do volunteer such information, you are giving your consent to the use of it for marketing campaign purposes
- 1.3. The site may link to other websites and we are not responsible for their data policies, procedures or content
- 1.4. We may monitor your usage of this website. This may include monitoring the number of times you visit, which pages you view, traffic data, location data and the originating domain name of a user's internet service provider. This information helps us to build a profile of our users. Some of this data will be aggregated, some in the form of statistics, which means that individuals will not be identified
- 1.5. Please see section 8 '**Cookies**' for more information. On occasion we may receive information about you from other sources which we will add to the information we already hold about you to help us provide products and services and improve our service to you
- 1.6. You have the right to receive information about the personal information we maintain on you. If you are concerned that any of the information we hold is incorrect, please contact us
- 1.7. We have responsibilities under Money Laundering legislation to verify the identity of clients and may need to make certain enquiries and obtain certain information from you for this purpose. You confirm that all information you supply will be accurate and that we may pass such information on to the relevant organisations as we consider necessary to comply with reporting requirements.

2. Personal Data Use

- 2.1. We will use your personal data for:
 - 2.1.1. helping us identify you and any accounts you hold with us
 - 2.1.2. administration
 - 2.1.3. statistical analysis
 - 2.1.4. customer profiling and analysis
 - 2.1.5. marketing (see '**Data Protection and Opting Out**' section 6 below)
 - 2.1.6. fraud prevention and detection

- 2.1.7. billing
- 2.1.8. customisation of this website and its content to your particular preferences
- 2.1.9. notifying you of any changes to this website or our services which may affect you
- 2.1.10. security vetting
- 2.1.11. improving our services

3. Disclosure of Personal Data

- 3.1. We may disclose your personal data to:
 - 3.1.1. other companies within our group
 - 3.1.2. our agents and service providers law enforcement agencies in connection with any investigation to help prevent unlawful activity
 - 3.1.3. our business partners in accordance with the '**Data Protection and Opting Out**' section 6 and '**Your Rights**' section 9 below
 - 3.1.4. You agree that we may disclose to the Financial Services Authority ('FSA') and to other regulatory authorities - to which we are subject, or to any person empowered to require such information by or under legal enactment, any information they may request or require relating to you or if relevant any of your clients

4. Keeping Data Secure

- 4.1. In line with the UK Data Protection Act 1998 we follow strict security procedures in the storage and disclosure of information which you provide to us, to prevent unauthorised access. Our security procedures mean that we may occasionally request proof of identity before we are able to disclose sensitive information to you.
- 4.2. When browsing the public (pre log – in) sections of this website your personal information and account details are not retrieved from our system
- 4.3. We will use technical and organisational measures to safeguard your personal data, for example:
 - 4.3.1. access to your account is controlled by password and username which are unique to you
 - 4.3.2. We store your personal data on secure servers. The secure server software (SSL – Secure Sockets Layer) encrypts all information you input before it is sent to us. The information between you and us is converted into random meaningless forms
 - 4.3.3. We currently use 128-bit encryption which is one of the most complex and sophisticated forms of encryption available

- 4.3.4. Whilst we will use all reasonable efforts to safeguard your personal data, you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal data which are transferred from you or to you via the internet or email. We recommend that you do not send sensitive or confidential information via email
- 4.3.5. You are not required to provide any personal information on this web site unless you choose to do so or are required to do so by the Inland Revenue or by governing legislation
- 4.3.6. You are required to keep your unique user id and password secure and not share this information with others to prevent any unauthorised access to your account(s) and/or fraudulent activity

5. Information Regarding Others

- 5.1. If you give us information on behalf of someone else, you confirm that the other person has appointed you to act on his/her behalf and has agreed that you can:
 - 5.1.1. give consent on his/her behalf to the processing of his or her personal data
 - 5.1.2. receive on his/her behalf any data protection notices
 - 5.1.3. give consent to the transfer of his/her personal data abroad

6. Data Protection and Opting Out

- 6.1. We may share your personal data with our business partners or companies within our group and we, or they, may contact you directly or send you communications (unless you specifically ask us or them not to do so) by mail, telephone, SMS, text/picture/video message, fax, or email, about products, services, promotions and events that we or they feel will be relevant to you.
- 6.2. If you prefer not to receive any further marketing communications from us, you can opt out at any time. See '**Your Rights**' section 9.3 below

7. Monitoring

- 7.1. We may monitor and record communications with you (such as telephone conversations and emails) for the purpose of quality assurance, training, fraud prevention and compliance.

8. Cookies

- 8.1. Cookies' are text files, which are sent to your computer or other access device when you access a web site. Information about you is stored in the cookies, which can be accessed whenever you visit that web site. This site does use Cookies
- 8.2. When you use this website, we may collect information about your computer, such as your IP address and/or browser, which we will use for administration purposes and statistical analysis. This information will not usually identify you personally
- 8.3. We may also obtain information about your online movements and use of the internet. We do this by placing a 'cookie', which is a small text file, on your computer's hard disk. Cookies are used for several reasons:
 - 8.3.1. to recognise you whenever you visit this website
 - 8.3.2. to speed up access to this website
 - 8.3.3. to build a profile about you
 - 8.3.4. to better target our marketing and advertising campaigns
 - 8.3.5. The vast majority of web browsers accept cookies. However, you can change your browser settings so that cookies are not accepted. If you do this, you may lose some of the functionality of this website.
 - 8.3.6. We will only read cookies from your cookie file placed there through your web browser's interaction with the site

9. Your Rights

- 9.1. You have the right, to request access to personal data which we may process about you. If you wish to exercise this right you should:
 - 9.1.1. put your request in writing
 - 9.1.2. Include proof of identity and address (e.g. a copy of your driving licence or passport, certified bank statement and a recent utility or credit card bill)
 - 9.1.3. Specify the personal data you wish to access, including account or reference numbers where applicable.
- 9.2. You have the right to request us to correct any inaccuracies in your data free of charge. If you wish to exercise this right you should:
 - 9.2.1. put your request in writing
 - 9.2.2. provide us with enough information to identify you (e.g. account number, username, registration details)
 - 9.2.3. Specify the information that is incorrect and provide the correct data replacements
- 9.3. You also have the right to ask us to stop processing your personal data for direct marketing purposes. If you wish to exercise this right you should:

- 9.3.1. put your request in writing (email marketing@ascentric.co.uk with a subject title 'Unsubscribe')
- 9.3.2. provide us with enough information to identify you (e.g. account number, username, registration details)

10. Advice

The pages of this site are for information only and do not constitute financial or other professional advice in any way. If you are in any doubt as to the validity of information made available within these pages, or if you wish to rely on this information, then it may be in your best interests to seek verification. Unless clearly indicated on this website, the information on this website is not intended to constitute any offer by us to enter into a contract with you. Any contract that we do enter into with you will be on the terms of our standard Agreement, which are available upon request.

11. Our Contact Details

- 11.1. We welcome your feedback and questions. If you wish to contact us, please send an email to marketing@ascentric.co.uk or you can write to us at 9 Palace Yard Mews, Bath, BA1 2NH or call us on +44 (0)871 423 6100. Our registered office is 9 Palace Yard Mews, Bath, BA1 2NH
- 11.2. We may change this privacy policy from time to time. You should check this policy occasionally to ensure you are aware of the most recent version which will apply each time you access this website.

12. Website Disclaimer

- 12.1. This Disclaimer sets out important information about www.ascentric.co.uk ("Website"). Please read it carefully as it affects your rights and liabilities under the law. If you do not agree with the Disclaimer, please do not use the Website. If you have any questions about this Disclaimer, please contact +44 (0)871 423 6100

13. Website Use

- 13.1. This Website is provided to you for your personal use subject to this Disclaimer. By using the Website you agree to be bound by this Disclaimer.
- 13.2. We may update this Disclaimer from time to time for legal or regulatory reasons or to allow the proper operation of the Website. Any changes will be notified to you via a suitable announcement on the Website. The changes will apply to the use of the Website after we have given you notice. If you do not wish to accept the new Disclaimer you should not continue to use the Website. If you continue to use the Website after the date on which the change comes into effect, your use of the Website indicates your agreement to be bound by the new Disclaimer.

14. Website Availability

We cannot promise that the Website will be fault-free. If a fault occurs with the Website you should report it to customerservices@ascentric.co.uk and we will attempt to correct the fault as soon as we can. Your access to the Website may be occasionally restricted to allow for repairs, maintenance or the introduction of new content. We will attempt to restore access as soon as we can.

15. General

- 15.1. The Website is owned and operated by Investment Funds Direct Limited, 9 Palace Yard Mews, Bath BA1 2NH
- 15.2. If you have any queries please contact marketing@ascentric.co.uk
- 15.3. Company Registration No. 1610781
- 15.4. FSA No. 114432
- 15.5. VAT No. 368 524 427
- 15.6. Last update: 6th January 2009

Website Copyright Notice

Unless otherwise stated, the contents of this site are the copyright of Investment Funds Direct Limited and all rights are reserved. Reproduction or copying of any material from this site will constitute a copyright infringement and can result in civil and criminal law penalties. Copyright 2009 © Investment Funds Direct Limited. (Investment Funds Direct Limited, 9 Palace Yard Mews, Bath BA1 2NH). All rights not expressly granted are reserved.