

Adviser Privacy Policy

This privacy policy applies to your use of the Wrap platform provided by Investment Funds Direct Limited

Last updated: May 2018

1 Contents

About Investment Funds Direct Limited	3
About this Privacy Policy	3
What data do we collect about you?	4
How do we collect your data?	4
How will we use your Personal Data?	5
Who will have access to your Personal Data?	5
Who else might we share your Personal Data with?	6
How do we protect your Personal Data?	6
For how long do we keep your Personal Data?	7
What are your rights?	7
Cookies	7

1 About Investment Funds Direct Limited

Investment Funds Direct Limited (“we”, “our” or “us”) is registered as a data controller with the Information Commissioner’s Office and our registration number is Z7560064.

As a data controller, we are responsible for deciding how we hold and use personal information about you. Our data protection officer is Yvonne Collins and you can contact us using any one (or more) of the following:

- IFDL, Trimbridge House, Trim Street, Bath BA1 1HB;
- customerservices@ifdl-uk.co.uk; or
- 0345 600 5361

2 About this Privacy Policy

We take seriously the privacy of those who access our Wrap platform, this can include employees of the Firm and anyone authorised on behalf of the Firm.

We request that you read this privacy policy carefully as it contains important information about how we will use your Personal Data, and how we will keep it safe.

In this privacy policy we also set out details about your rights in relation to the Personal Data we hold about you, and how to contact us if you have any questions or comments.

This privacy policy may change from time to time and, if it does, the up-to-date version will always be available through the platform.

3 What data do we collect about you?

We may collect the following data about you:

- Your name(s);
- Your date of birth;
- The contact details that you have provided including email address, social media accounts, telephone number and address;
- Your nationality;
- Your employer where relevant (i.e. the Firm with whom we have an Adviser or Network Agreement);
- Your role (i.e. if you are the Firm Principal, a Registered Individual);
- Your National Identifier, for example your National Insurance Number; and
- Any relevant FCA Registration number.

When you use the Wrap we may automatically collect the following information:

- Web usage information (e.g. your IP address), your login information, browser type and version, time zone setting and operating system; and
- Information about your visit, including which pages you have visited, links you have clicked on, searches you have made and other page interaction information.

4 How do we collect your data?

We will obtain Personal Data about you whenever you or your Firm completes a Financial Adviser, Network or Appointed Representative Application and also when a client of yours completes an Application, either on paper or online. We may also collect Personal Data about you during your correspondence with us, including in writing or over the phone, or from other documentation you provide to us.

If you provide us with Personal Data relating to other people, such as a colleague, you will need to check with them that they are happy for you to share their data with us.

5 How will we use your Personal Data?

We will collect, store and use Personal Data you provide to us in order to carry out the activities relevant to the provision of our services to you. We will only do this where:

- It is necessary for us to do so to enable us to provide you with the services that you have requested from us – for example, communicating with you about your clients;
- We carry out market analysis;
- We carry out marketing and/or promotional activities. You can tell us if you do not want to receive these communications;
- It is necessary in order to fulfil our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; or
- The law otherwise permits or requires it.

Where we process your Personal Data on the basis of our legitimate interests, these are our (or our third party's) interests in providing our services to you in an efficient and secure manner.

We will use your Personal Data for:

- Helping us identify you;
- Providing our service;
- Administration such as notifying you of changes to our online or other services and providing you with information which may affect you;
- Market insight and profiling using aggregated data;
- Confirmation of Regulatory permissions;
- Customisation of the online service and its content to your particular preferences;
- Improving our services (including requesting feedback);
- Contacting you from time to time in relation to services which may be of interest to you, unless you have told us you do not want to receive these;
- Ensuring compliance with our legal obligations, co-operating with the court service, our Regulators and law enforcement agencies;

where we consider that such processing is legitimised.

You confirm that all information that you supply is accurate.

6 Who will have access to your Personal Data?

Your Personal Data will only be seen or used by those of our employees who have a legitimate business need to access your Personal Data for the purposes set out in this privacy policy.

We take your privacy seriously and have implemented appropriate physical, technical and organisational security measures designed to secure your Personal Data against accidental loss, destruction or damage and unauthorised access, use, alteration or disclosure.

7 Who else might we share your Personal Data with?

Except as explained in this privacy policy, we will not share your Personal Data with third parties without your consent unless required to do so by law.

To comply with our legal, statutory and regulatory obligations we may share your Personal Data with authorities including but not limited to:

- The Financial Conduct Authority
- The Financial Ombudsman Service
- Fraud prevention agencies

We will share your Personal Data with the following third parties who assist us with the provision of our services to you:

- Companies who provide services to us, for example:
 - suppliers who support us in distributing our communications to you;
 - suppliers who provide information technology services to us;
 - suppliers of other services to you, where you have requested we provide them with data; and
 - market analysis companies who use aggregated and anonymised data for analysis purposes.

In most cases, the ability of our third parties to use your data is limited and we will only allow them to use your Personal Data for specific purposes in accordance with our instruction and not for their own purposes. We will ensure that where these third parties process your Personal Data they do so in the way set out in this privacy policy and in compliance with law.

For reporting and administrative purposes, it may sometimes be necessary to share some of your Personal Data with other members of our group of companies.

We may also share your data with our mutual clients where necessary to meet our obligations to those clients. The data that we collect from you may be transferred to, and stored at a destination outside the European Economic Area (“EEA”) and in countries which are not deemed by the European Union to offer a standard of data protection equivalent to that under the applicable Data Protection Legislation. If we do transfer your Personal Data outside the EEA we will ensure that the model contract clauses from controller to processor, as approved by the European Commission for the purposes of Article 26(2) of Directive 95/46/EC, or other such clauses as may replace them from time to time, are at all relevant times incorporated into the data processing agreement between us and any third party.

8 How do we protect your Personal Data?

We have put in place measures to protect the security of your information. Details of these measures are available upon request.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable Regulator of a suspected breach where we are legally required to do so.

Unfortunately, the transmission of your Personal Data via the internet is not completely secure and although we do our best to protect your Personal Data, we cannot guarantee the security of data transmitted to us over the internet and you acknowledge that any transmission is at your own risk.

The online service and the Wrap may link to other sites and we are not responsible for their data policies, procedures or content.

9 For how long do we keep your Personal Data?

We will keep your Personal Data for no longer than is necessary for the purposes we have set out above.

We will keep your Personal Data for the period for which you remain an authorised user of our services plus the length of time dictated to us by applicable law. If we end our relationship with any third parties, we will make sure they securely delete or return your Personal Data to us.

We (or our agreed suppliers) may retain Personal Data about you for statistical purposes (for example, to help us better provide our services). Where data is retained for statistical purposes it will always be anonymised, meaning that you will not be identifiable from that data.

10 What are your rights?

You have a number of rights in relation to your Personal Data. There are circumstances in which your rights may not apply. You have the right to request that we:

- Provide you with a copy of the information we hold about you;
- Update any of your personal information if it is inaccurate or out of date;
- Delete the Personal Data we hold about you – if we are providing services to you and you ask us to delete Personal Data we hold about you then we may be unable to continue providing those services to you;

- Restrict the way in which we process your Personal Data. Please note that, if we are providing services to you and you ask us to restrict the processing of Personal Data we hold about you, we may be unable to continue providing those services to you;
- Stop processing your data if you have valid objections to such processing; and
- Transfer your Personal Data to a third party.

For more information on your rights and how to use them, or if you would like to make any of the requests set out above, please contact us using the details provided in section 1. We will respond to all such requests within the time period required by law.

11 Cookies

We use cookies on our online service. A cookie is a tiny text file that can be stored on your computer and can be read on subsequent visits. This allows the online service to identify you and record how you navigate it.

There are different types of cookies used for different purposes. The cookies we use are listed below under the four cookie categories proposed by the International Chamber of Commerce.

Strictly necessary cookies

These are cookies that are directly required to fulfil an action requested by you, such as logging in or adding an item to a shopping basket.

We use these strictly necessary cookies:

Cookie	Name	Purpose
Set when logging in to the platform only	<ul style="list-style-type: none">• BKSidCke• ASPNET_SessionId• cod• BKS_BQZP6G3GQR• Scroll Pos• <empty>• 2CAAQD97-A7B1-4520-B6BB-8CB964013C6BC• __RequestVerificationToken_L1NpdGVZ0• 0F925410-3848-4652-8257-D4EBAFDBC265	To ensure you see the correct information and branding

Performance cookies

These are cookies used to improve a website, for example for analytics that let companies see how their site is used and where to make improvements.

Functionality cookies

These are cookies that are needed for a specific piece of functionality, often as a result of something you are doing as a user, but are not directly requested by you. For example, in order to stop you from being repeatedly offered a service that you have previously said no to.

We do not use any functionality cookies.

Targeting cookies

These cookies can be quite intrusive as they track a user's browsing behaviour from website to website, often to be used for targeted advertising.

We do not use any targeting cookies.

Deleting Cookies

If you want to remove any cookies already set, you can do so from your browser. You can find out how to do this by going to the help menu in your browser.

For more information about how to control and disable cookies in your browser please visit: <http://www.aboutcookies.org>

Please note that if you attempt to delete cookies while you are logged in, the system will automatically log you out.



Contact us.

0345 600 5361

customerservices@ifdl-uk.co.uk

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.

Investment Funds Direct Limited (IFDL), registered in England and Wales number 1610781 and authorised and regulated by the Financial Conduct Authority No.114432.

Head office: Trimbridge House, Trim Street, Bath BA1 1HB.
Client Services: 0345 600 5361. Telephone calls may be recorded for training and security purposes.

IFDL is part of the Royal London Group, registered in England and Wales number 00099064.

Head office: 55 Gracechurch Street, London EC3V 0RL.