

Transact Privacy and Cookie Policy



Transact is committed to protecting your personal information and ensuring that it is used fairly and responsibly. This Privacy and Cookie Policy (the 'Policy') sets out what personal information Transact will collect about you and how it will use this information.

Transact

In this Policy 'Transact' and 'we' means Integrated Financial Arrangements Ltd, IntegraLife UK Limited and IntegraLife International Limited, which together provide you with the Transact Portfolio and the Wrappers held within your Portfolio. Together we will collect, use, keep and share (including amongst ourselves) your personal information as described in this Policy

Integrated Financial Arrangements Ltd and IntegraLife UK Limited are Data Controllers registered with the UK Information Commissioner. You can find details of their registrations in the Public Register of Data Controllers on the Information Commissioner's website at www.ico.gov.uk

IntegraLife International Limited is a Data Controller registered with the Office of Isle of Man Data Protection Supervisor. You can view the Register of Data Controllers on the Supervisor's website at www.gov.im/odps

The personal information we collect about you

In order to provide you with the Transact Portfolio and any Wrapper within your Portfolio we need to collect, use, share and store personal information about you, including your name, address, nationality, national insurance number and bank details.

In addition, depending on the Wrapper you apply for, we will collect other personal information about you including your income, employment details, source of funds and knowledge of financial instruments. We may do this, both at the time you open the Wrapper and at any time you give us instructions in relation to your Wrapper after we have opened it.

We may also require you to provide us with information about your health and medical history (known as 'sensitive information') for certain Wrappers and services, for example the Discounted Gift Trust. We will always ask you for your consent before you provide us with sensitive information. If you do not give us your consent we will not be able to provide these products and services to you.

Generally we collect information directly from you but we may also obtain information from third parties, such as your employer, HMRC, joint Portfolio holders and credit reference agencies.

Where you provide us with personal information relating to others e.g. your dependants or joint Portfolio holders for the purpose of opening and administering your Transact Portfolio, you confirm that you have their consent or are otherwise entitled to provide this information to us and for us to use it in the ways described in this Policy.

How we use your Personal Information

We will use your personal information for the following purposes:

- To evaluate your Portfolio application, including verifying your identity
- To confirm the source of any funds you may want to pay into your Portfolio from time to time
- To operate and administer your Portfolio and generally to provide services to you as a Transact client. This includes (when instructed by you or your adviser) to link your Portfolio (including sharing limited information in respect of your Portfolio) to your nominated family member's Portfolio enabling you to benefit from discounted Transact charges
- To evaluate the current and future needs of all our clients and to help better manage our business
- To maintain the accuracy and integrity of our administration system, including systems development work to enhance the products and services we are able to provide to you
- To meet our legal and regulatory requirements
- To conduct statistical (e.g. client satisfaction surveys) and record keeping operations.

To whom we may send your personal information

We may send your personal information to the following:

- To your nominated email address. This will include email notifications of trades placed on your Portfolio by you or your nominated adviser
- Companies who provide a service to us; for example printing and mailing companies to help us provide you with documentation in relation to your Portfolio and data processing companies who help us to maintain and develop our computer systems. Some of these companies may be located outside the European Economic Area. We choose our service companies and agents carefully and we impose strict contractual obligations on them to ensure they protect your personal information to the standards of confidentiality and security that we observe
- To legal and regulatory authorities or any third party when required to do so; for example in order to comply with a court order, or in connection with suspected money laundering or other serious crime, or to respond to any request from either a UK or overseas regulator
- To credit reference agencies to verify your identity. The reference agency will check the details supplied by you against any particulars on any database (public or otherwise) to which they have access. The agency will add a note to your credit file to show that an identity check has been made, but only you will be able to see this. It will not be disclosed to any third parties and it will not affect your credit rating

- Your advisers; for example your financial adviser, lawyer, accountant or other professional adviser where authorised by you and to any other person notified to us by you to give instructions in relation to your Transact Portfolio
- To any third party to whom we transfer or may transfer our rights and duties under your Transact Portfolio, including any third party as a result of any restructure, sale or acquisition of any company within the Transact group of companies, provided the recipient uses your personal information for the same purposes as it was originally supplied to us and/or used by us
- To any third party to whom we are permitted by law or regulation to disclose your personal information for our legitimate business purposes.

How we keep your personal information secure

We are committed to ensuring that your personal information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to keep it safe and secure. For example only employees who need personal information to provide services to you have access to it. We also employ a variety of electronic security measures such as passwords, firewalls and data encryption techniques.

The period of time we will hold your personal information

We will hold your personal information after you have closed your Transact Portfolio for as long as permitted for legal, regulatory, fraud and other financial crime prevention and legitimate business purposes.

Client Marketing

We will not use a client's personal information to send out marketing materials about Transact or any third party's products and services.

Adviser Marketing

Unless an Adviser notifies us otherwise, we will use their details to send them up-to-date information about new Transact products and services that we think may be of interest to them.

Cookies

What are cookies?

Cookies are text files that are sent to your computer when you access a website. They are used as a means of collecting information about you such as your IP address and how you have used our website. The following is a list of the different types of cookies that can be used:

- **Session cookies** only exist for the duration of your visit to our website and are deleted on exit. Session cookies are used to maintain the link between the web server and your computer so that you can move between various pages on our website without having to login each time. They also help maintain security
- **Persistent or permanent cookies** are stored on your computer's hard drive and remain there until they expire or are deleted. These cookies are used to remember the preferences or actions of the user across the website

The above types of cookies may be set by the website you are viewing (known as first party cookies) or are set by a website other than the one you are viewing (known as third party cookies)

- **What cookies do we use?** We use both first party cookies and third party cookies. We use cookies exclusively to help us provide a better service by monitoring which pages you find useful and which you do not. By continuing to browse our website, you are agreeing to our use of cookies.

The Cookies in Detail document on our website explains the types of individual cookies that we currently use, their purpose and how you can opt out or reject these cookies.

To find out more about cookies, including how they can be controlled and deleted visit the following websites: <http://www.allaboutcookies.org/> and <http://www.aboutcookies.org/>.

Third Party Links

This Policy does not cover any third party links on our website that link to other websites. We encourage you to read the privacy statements on the other websites you visit.

Accessing and correcting your personal information

You have a right to request a copy of the personal information we hold about you. If you would like a copy of some or all of your personal information please write to us at the address given below. We will provide you with the personal information you have requested within 40 days. We may charge you £10 for this service.

We want to make sure that the information you give us is accurate and up to date. You may ask us to remove, update or correct any information you think is inaccurate.

Changes to our Policy

We keep our Policy under regular review and we will place any updates on our website. You may also contact us via any of the addresses given below for an up to date version. This Policy was last updated in October 2015.

How to contact us

Please contact us if you have any questions about our Policy or information we hold about you at the following:

Transact Data Protection Officer

Integrated Financial Arrangements Ltd
29 Clement's Lane
London
EC4N 7AE

Telephone: +44 (0)207 608 4900

Fax: +44 (0)207 608 5300

Email: info@transact-online.co.uk

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"Transact" is operated by Integrated Financial Arrangements Ltd, 29 Clement's Lane, London EC4N 7AE.
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(Registered office: as above; Registered in England and Wales under number: 3727592)

Authorised and regulated by the Financial Conduct Authority (entered on the Financial Services Register under number: 190856).