IFDL

Client Privacy Policy

This privacy policy applies to your use of the wealth management service (also known as the Platform) provided by Investment Funds Direct Limited

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1 About Investment Funds Direct Limited

Who we are

Investment Funds Direct Limited ("we", "our" or "us") is registered as a data controller with the Information Commissioner's Office (ICO), registration number Z7560064.

Investment Funds Direct Limited is a member of the M&G plc group of companies. A list of the companies that form this group is available here. If you're unable to use this link please get in touch by phone or email using the contact details shown below.

Your personal information

As a data controller, we are responsible for deciding how we hold and use personal information about you.

If you have any questions about this policy or would like to request a copy of the personal information we hold about you, you can contact us via:

- **Post:** The Data Protection Officer, IFDL, Trimbridge House, Trim Street, Bath BA1 1HB;
- **Email:** platformsupport@mandg.com; or
- **Phone:** 0345 600 5361. Our lines are open 8:30am to 5:30pm, Monday to Friday.

If you would like to request a copy of the personal information we hold on you please email platformsubjectaccessrequests@mandg.com

Please see section 10 for further information on our complaints process.

2 About this Privacy Policy

Please read this privacy policy alongside our Terms.

We take your privacy seriously. This policy explains:

- How we use your personal information;
- How we keep it safe; and
- What your rights are.

It also tells you how to contact us if you have any questions, complaints or feedback.

This policy may be updated from time to time. The latest version will always be available on our platform.

If you'd prefer a copy sent to you, just get in touch using the contact details above.

We can also provide this policy in large print, braille or spoken word. To request an alternative format please get in touch using the details above.

3 What information do we collect about you?

To provide our services and meet legal requirements, we may collect the following information about you:

Personal details

- Your name
- Gender
- Date of birth
- Nationality
- Home address
- Personal email address
- Telephone number

Employment and tax information

- Your employment status (e.g. if you're working overseas and applying for an ISA)
- Whether you or your spouse are a Crown employee (e.g. diplomat or armed forces)
- Corporate directorships or trustee roles (if applying on behalf of a company, trust or charity)
- Country where you pay tax
- National identifier (e.g. National Insurance number)

Relationships

- Details about your relationship with others, if needed to provide our services (e.g. spouse, partner, parents, children, grandchildren, or Power of Attorney/trust arrangements)
- For Junior ISAs, we may collect information about a child – but only where we have a lawful reason to do so

Financial and legal information

- Information to confirm your identity and the source of your investment funds (to meet anti-fraud, money laundering and anti-terrorism laws)

Biometric and criminal offence data

We may process biometric identifiers (for example, a copy of your passport) or criminal offence data. We will do so with your consent, or where the law permits or requires it, such as where it's necessary to meet our:

- Legal or regulatory obligations
- Recognised legitimate interests (see below); or
- For a substantial public interest (for example, prevention or detection of fraud or financial crime)

Health information

- Where necessary for us to provide our services to you (for example you or your doctor may provide us with medical information to support early access to your pension fund if you become seriously ill)

Online usage

When you use our online services, we may automatically collect:

- Your IP address, login details, browser type and version, time zone and operating system
- Information about your visit (e.g. pages viewed, links clicked, searches made, and other interactions)

For further information on our cookie policy please refer to section 11.

Call recordings and transcripts

When you contact us by telephone, we may record calls for training, quality assurance, regulatory compliance and record-keeping purposes.

Where calls are recorded, they may also be transcribed.

Call recordings and any associated transcripts are retained for up to 10 years, after which they are securely deleted.

4 How do we collect your information?

We collect personal information about you in the following ways:

- When you or your Financial Adviser completes an application – either online or on paper
- When you or your Financial Adviser contacts us – by phone, email or in writing
- When you provide documents to us – such as your driving licence
- When you apply for a Stocks and Shares Junior ISA, we collect information about the child at the application stage

Before you give us personal information about someone else (such as a relative), please make sure they're happy for you to share it with us.

You confirm that all the information you provide is accurate.

5 How will we use your personal information?

We collect, store, share and use the personal information about you so we can:

- Provide the services you've requested
- Meet our contractual obligations to you

We will also use your information when:

- It's necessary to deliver the services you've asked for – for example, sending valuation statements by post (where applicable), or sharing relevant details with your Financial Adviser
- It supports our legitimate interests (or those of a third party), and your rights do not override those interests
- It is for the purpose of a recognised legitimate interest (see below)
- The law allows or requires it, for example:
  - Responding to a section 793 Companies Act request
  - Processing information for a substantial public interest or your vital interests, such as when supporting a vulnerable person

We also process your personal information to meet legal and regulatory obligations – for example, complying with guidance on the fair treatment of vulnerable customers.

Legitimate interests

In some cases, we use your personal data for certain important purposes set out in UK data protection law. These are known as legitimate interests.

Legitimate interests means we can use your personal data for a reasonable and necessary purpose, as long as this does not unfairly impact your rights or privacy. We carefully consider the impact on you before using your data in this way to make sure your interests are protected.

Recognised legitimate interests

In certain limited situations set out in UK data protection law, known as recognised legitimate interests, we may be allowed to use your personal data without carrying out this full assessment.

We may rely on recognised legitimate interests only where the processing (which may include sharing information within M&G plc or with relevant authorities or organisations) is necessary and proportionate for one of the following purposes:

- Detection, investigation and prevention of crime, including fraud
- Apprehension or prosecution of offenders
- Safeguarding a vulnerable individual or group, including protecting them from neglect of physical, mental or emotional harm, or protecting their wellbeing
- Responding to an emergency
- Sharing personal information to assist other organisations in performing their public tasks or official functions
- Safeguarding national security, public security or defence

Where we rely on recognised legitimate interests, your rights under data protection law still apply (see section 10). However, in some cases your rights may be limited due to the nature of the processing (for example, where this is necessary for crime prevention or safeguarding).

We may use your personal information for:

Identity and account management

- Identifying you and linking you to any accounts you hold with us
- Providing access to our online service

Health-related requests

- Processing requests made on medical grounds (e.g. early pension access due to serious illness)

Using health and other sensitive personal information

For processing of sensitive personal information (such as information relating to your health and medical history), we will process this type of data with your explicit consent, or without your explicit consent where the law permits or requires it. This may include where we need to protect someone's vital interests, or for the purposes of a recognised legitimate interest (see above) or substantial public interest (for example, safeguarding a vulnerable person). If we rely on your explicit consent, we will obtain this either directly from you or from your Financial Adviser.

Service updates and administration

- Notifying you about changes to our services
- Providing you with information that may affect you

Insights and analysis

- Carrying out statistical analysis
- Understanding customer needs through market insight and profiling (using aggregated data)

Security and compliance

- Preventing and detecting fraud
- Verifying your identity under anti-money laundering legislation
- Customising our online service to suit your preferences
- Improving our services
- Cooperating with courts, regulators and law enforcement agencies
- Ensuring we meet our legal obligations

Profiling and automated decision making

We may use automated processing (including profiling) to help us make decisions about you. There will usually be human review or oversight in that process, but where we make a decision about you using solely automated processing of your personal information, and that decision has a legal or similarly significant effect on you, you have the right to:

- Receive information about the logic involved in and how the decision may affect you;
- Express your views about and challenge any such decision;
- Ask for human involvement in relation to any such decision.

You can exercise these rights by contacting us using the details on the last page of this policy. In some circumstances, the law places additional restrictions on our ability to make such decisions, and we will only make such decisions where permitted by law.

To the extent that we conduct such automated decision making activity, we'll provide you with further information at the appropriate time unless already provided in this privacy policy.

We may use a variety of technology solutions to process your data, including artificial intelligence technologies. These may be used to support provision of our services (such as assisting with complaints handling) and may include training artificial intelligence models with your data. Your data will be anonymised wherever possible prior to any model training.

We will always strive to ensure that any use of artificial intelligence includes appropriate human oversight and is compliant with applicable laws and regulations. We only process your personal information where we have a valid reason to do so – whether that's to fulfil a contract, meet legal requirements, or support our, or our third parties, legitimate interests.

6 Who will have access to your personal information?

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

We take your privacy seriously. To protect your personal information, we've put in place appropriate physical, technical and organisational measures. These are designed to prevent accidental loss, destruction or damage, and to guard against unauthorised access, use, alteration or disclosure.

7 Who else might we share your personal information with?

Except as explained in this privacy policy, we will not share your personal information 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 information with authorities including but not limited to:

- The Financial Conduct Authority (FCA) and other regulatory bodies in the UK and abroad
- The Financial Ombudsman Service
- HMRC and other tax authorities
- Fraud prevention agencies
- Courts and law enforcement agencies

We also share your personal information with third parties who help us deliver our services to you, including:

- Credit reference agencies – to verify your identity and address, where necessary
- Third-party product providers – so they can supply the products you've chosen
- Service providers, such as:
  - Companies that help us send letters to you
  - IT providers who support us or your Financial Adviser
  - Market analysis firms using aggregated and anonymised data for research
  - Screening providers – trusted third-party providers who help us meet our legal and regulatory obligations, including Anti-Money Laundering (AML) and Know Your Customer (KYC) checks
  - Fund administrators – professional third-party administrators responsible for the day-to-day back-office administration of the funds in which you are invested
  - Companies that help us process your personal information on our behalf, for the purpose of performing our contractual obligations to you

In most cases, these third parties can only use your personal information for specific purposes and under our instructions. They are not allowed to use your information for their own purpose, except in circumstances where such service providers have to fulfil their own regulatory requirements, in which case the relevant service provider will act as independent data controller to meet its own regulatory obligations. We ensure that such service providers handle your personal information in line with the law.

We may also share your personal information within M&G plc for any of the purposes listed in Section 5.

If you've appointed a Financial Adviser or Discretionary Fund Manager, we may share your personal information with them and their service providers to help us deliver the services you've requested. Some of these organisations will process your data on our behalf, and in accordance with our instructions, while others will be responsible to you directly for how they use it. You can contact us using the details in Section 1 to find out more.

Transferring your information outside the UK and EEA

We may transfer some of your personal information to countries outside the United Kingdom (UK) and the European Economic Areas (EEA), some of which may not have data protection laws and standards as comprehensive as those in the UK or countries within the EEA. Where information is transferred outside the UK and EEA, we will ensure that this is done only where:

- The destination country has been issued with a data protection 'adequacy' decision by the European Commission and/or the UK Government (as applicable)
- We have contractual terms in place with the recipient which are in a form that the Information Commissioner (or if applicable, equivalent European data protection supervisory authority) has decided adequately safeguards your information; or
- The transfer is otherwise made in a manner which the Information Commissioner (or if applicable, equivalent European data protection supervisory authority) considers adequately safeguards your information

In more limited circumstances, we may need to rely on a derogation (an exemption from or relaxation of a rule or law) under Article 49 of the GDPR e.g where the transfer is necessary to allow us to perform our contractual obligations to you or to perform a contract which is in your interest.

Other disclosures

Notwithstanding the terms of this privacy policy, we may disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal information to the prospective seller or buyer of such business or assets
- If we or substantially all of our assets are acquired by a third party, in which case personal information held by us about our clients may be one of the transferred assets
- If we are under a duty to disclose or share your personal information in order to comply with any legal or contractual obligation or in order to enforce or to protect the rights, property, or safety of IFDL, our service, our users and any third party we interact with to provide the services

8 How do we protect your personal information?

We take the security of your personal information seriously and have put measures in place to protect it. You can request details of these measures at any time.

We also have procedures to deal with any suspected data security breach. If a breach occurs, we will notify you, and any relevant regulator, where we are legally required to do so.

Please note that while we do our best to protect your personal information, sending data over the internet is not completely secure. We cannot guarantee the security of information transmitted to us online, and you acknowledge that any transmission is at your own risk.

Our online service and Platform may contain links to other websites. We are not responsible for the data policies, procedures or content of those external sites.

9 For how long do we keep your personal information?

We will keep your personal information only for as long as it's needed for the purposes explained in this policy.

If you open an account with us, we will keep your personal information while you remain a customer. After your account is closed, we will retain your information for the period required by applicable law.

If we end our relationship with any third parties, we will ensure they either securely delete your personal information or return it to us.

We (or our approved suppliers) may keep anonymised information about you for statistical purposes – for example, to help us improve our services. This data will not identify you.

10 What are your rights?

You have a number of rights in relation to your personal information. 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 information we hold about you – if we are providing services to you and you ask us to delete personal information 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 information. Please note that if we are providing services to you and you ask us to restrict the processing of personal information we hold about you, we may be unable to continue providing those services to you
- Stop processing your information if you have valid objections to such processing
- Transfer your personal information 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 through platformsubjectaccessrequests@mandg.com

We will respond to all such requests within the time period required by law.

Raising a concern or complaint

We take the privacy and protection of your personal information seriously. To help ensure compliance with data protection laws:

- We have appointed a Data Protection Officer (DPO); and
- We keep records of complaints for at least three years, in line with regulatory requirements

If you're unhappy with how we use your personal information or how we've handled a request, you can raise a complaint by contacting us using the details below.

Contacting the Data Protection Officer

- **Phone:** 0345 120 3022, Monday to Friday 9:00am – 5:00pm
- **Email:** platformcomplaints@mandg.com

We will acknowledge your complaint within 30 days and handle it in line with applicable laws and regulations.

Call us

0345 120 3022

We're open Monday to Friday 9:00am – 5:00pm. Calls may be recorded for training and quality purposes.

Write to us

Complaints Team, IFDL, Trimbridge House, Trim Street, Bath BA1 1HB

Email us

platformcomplaints@mandg.com

If you're not satisfied with our response

If you remain dissatisfied after contacting us, you have the right to refer your complaint to the Information Commissioner's Office (ICO), the UK's independent authority for data protection.

- **Phone:** 0303 123 1113 (or +44 16255 45700 if calling from outside the UK)
- **Online:** ico.org.uk

For individuals covered by EU GDPR, you may also lodge a complaint directly with your relevant supervisory authority without first raising it with us.

For contact details of other EU Data Protection Authorities, please refer to: National Data Protection Authorities.

11 What are Cookies?

A cookie is a small text file that a website stores on your computer or mobile device. It can be read during future visits to help the website recognise you. For example, so it can remember to log you in automatically next time.

How long cookies stay on your device

- **Session cookies:** these are temporary and are deleted when you leave the website.
- **Persistent cookies:** these remain on your device until they expire or you delete them.

If you want to remove cookies already stored on your device, you can do this through your browser settings. Visit your browser's help menu for instructions, or go to aboutcookies.org for more information on how to control and disable cookies.

Note: if you delete cookies while logged in, the system will automatically log you out.

Types of cookies we use

We use different types of cookies for different purposes. Some are essential for the platform to function properly, while others help us improve your experience by collecting information.

The cookies we use are listed below under four categories:

Strictly necessary cookies

These cookies are essential for the platform to function properly. They enable actions you request, such as logging in or navigating securely. Without them, some services may not work as intended.

We use the following strictly necessary cookies:

Name	Purpose	More information
Session ID	Set by Funds Library when logging into the platform	Session Fund Communication Solutions' privacy policy at: https://fundslibrary.com/privacy-policy
__RequestVerificationToken	Anti-forgery cookie used to protect against cross-site request forgery (CSRF)	Session
12152EAC-B00E-4694-906F-42B5A9FF700D	Ensures correct information and branding is displayed	Session
9A5A54D8-C34F-4A29-95B9-2C188240905D	Ensures correct information and branding is displayed	Session
OptanonConsent	Set by OneTrust to store cookie category preferences and consent status	Persistent (1 year)

Performance cookies

Performance cookies help us understand how visitors use the platform so we can improve its functionality and user experience. These cookies collect information in an anonymous form, such as the number of users, where they accessed the platform from, and which pages they visited.

We use the following performance cookies:

Name	Purpose	More information
Adobe analytics cookies: • s_ecid • AMCV_210BDD9D56D6C97D7F000101 • gpv • s_sq • s_cc	These cookies collect anonymous usage data to help us understand how visitors use the platform. This includes tracking page visits, navigation patterns, and visitor counts.	• Expiration: 2 years persistent • Expiration: 2 years persistent • This cookie is a session cookie and expires when the browser is closed • This cookie is a session cookie and expires when the browser is closed • This cookie is a session cookie and expires when the browser is closed For more information about Adobe analytic's cookie's, read here: https://experienceleague.adobe.com/docs/core-services/interface/ec-cookies/cookies-analytics.html
Vimeo cookies	Vimeo sets cookies when videos are embedded on the platform. These cookies track usage and preferences. By using the Vimeo service, users consent to these cookies.	You can find more information on Vimeo cookies at: vimeo.com/legal/privacy/cookies For more information you can view Vimeo's privacy policy at: vimeo.com/legal/privacy/policy

Functionality cookies

Functionality cookies support specific features on the platform. They are often triggered by something you do as a user, but not directly requested. For example, preventing repeated prompts for a service you've previously declined.

We do not use any functionality cookies.

Targeting cookies

Targeting cookies track browsing behaviour across websites and are often used for personalised advertising. These cookies can be more intrusive due to the nature of the data they collect.

We do not use any targeting cookies.

IFDL

Contact us

0345 600 5361

Telephone calls may be recorded for training and security purposes.

IFDL, Trimbridge House, Trim Street, Bath BA1 1HB

platformsupport@mandg.com

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