



# 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

# Contents

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About Investment Funds Direct Limited	3
About this Privacy Policy	3
What information do we collect about you?	4
How do we collect your information?	4
How will we use your personal information?	5
Who will have access to your personal information?	5
Who else might we share your personal information with?	6
How do we protect your personal information?	7
For how long do we keep your personal information?	7
What are your rights?	8
What are cookies?	9

# 1 About Investment Funds Direct Limited

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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.

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.

As a data controller, we are responsible for deciding how we hold and use personal information about you. You can contact us about this policy using any one (or more) of the following:

- The Data Protection Officer, IFDL, Trimbridge House, Trim Street, Bath BA1 1HB;
- [platformsupport@mandg.com](mailto:platformsupport@mandg.com); or
- 0345 600 5361

If you would like to request a copy of the personal information we hold on you please email [platformsubjectaccessrequests@mandg.com](mailto:platformsubjectaccessrequests@mandg.com)

## 2 About this Privacy Policy

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This privacy policy should be read in conjunction with the [Terms](#).

We take the privacy of our Clients’ information seriously. Please read this privacy policy carefully as it contains important information about how we will use your personal information, and how we will keep it safe.

We also explain your rights in relation to the personal information 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. You can ask us to send you a copy by contacting us using the details shown above.

We can provide this privacy policy to you in large print, braille and spoken word. If you require this please contact [platformsupport@mandg.com](mailto:platformsupport@mandg.com) or call 0345 600 5361.

## 3 What information do we collect about you?

We collect the following information about you:

- **Your name**
- **Your date of birth**
- **Your contact details** including your home address, personal email address and telephone number
- **Your nationality**
- **Information which relates to your payment of tax**, such as in which country you pay tax and your national identifier (for example your national insurance number)
- **Your relationships with others**, where necessary for us to provide our services to you. This may include, for example, your relation to your spouse (through marriage or civil partnership), co-habiting partner living at the same address, parents, grandparents, children or grandchildren where you are part of a family group on our Platform, or when a Power of Attorney or trust exists in relation to your portfolio on our Platform. Where we need to collect information about a child, for the Stocks and Shares Junior ISA, we will only do so where we have a lawful basis of processing
- **Your employment status**, where necessary for us to provide our services to you. For example, if you are working overseas and wish to open an ISA, we would need to know if you (or your spouse) is a Crown employee (such as a diplomat or member of the armed forces). We would also need to know about corporate directorships or trustee positions held where you apply to open a portfolio on the Platform for a corporate body, trust or charity

- **Information about your identity and the source of the money you are investing** to meet the requirements on the anti fraud, money laundering and terrorism legislation
- **Information about your health** 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)

When you use the online service 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
- **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 information?

We will obtain personal information about you whenever you or your Financial Adviser completes an Application either in paper or online. We may also collect personal information about you during your or your Financial Adviser's correspondence with us, including in writing or over the phone, or from other documentation you provide to us such as your driving licence.

We collect children's information in relation to the Stocks and Shares Junior ISA at the Application stage.

If you provide us with personal information relating to other people, such as a relative, you will need to check with them that they are happy for you to share their information with us.

**You confirm that all information that you supply is accurate.**

## 5 How will we use your personal information?

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We will collect, store, share and use personal information you provide to us so that we can do what we need to provide the services you have requested from us; and for us to meet our contractual obligations to you. We will also 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, sending valuation statements to you by post (where applicable) and providing information to your adviser (where necessary)
- 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
- The law otherwise permits or requires it, for example for legislative purposes such as responding to a section 793 Companies Act request or where we need to process your information for a substantial public interest or your vital interests as in the case of information collected in respect of a vulnerable person

We will process your personal information for ensuring compliance with, for example our legal obligations, or where we need to comply with regulatory guidance such as Guidance for firms on the fair treatment of vulnerable customers.

Where we process your personal information 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 information for:

- Helping us identify you and any Accounts you hold with us
- Providing our online service
- Processing requests made on medical grounds
- Administration such as notifying you of changes to our online or other services and providing you with information which may affect you
- Statistical analysis
- Market insight and profiling using aggregated customer information
- Fraud prevention and detection, including satisfying our responsibilities under anti-money laundering legislation to verify the identity of our clients
- Customisation of the online service and its content to your particular preferences
- Improving our services
- 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.

## 6 Who will have access to your personal information?

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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 and have implemented appropriate physical, technical and organisational security measures designed to secure your personal information against accidental loss, destruction or damage and unauthorised access, use, alteration or disclosure.

## 7 Who else might we share your personal information with?

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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 and other countries' regulatory authorities
- The Financial Ombudsman Service
- HMRC and other countries' tax authorities
- Fraud Prevention agencies
- Courts and law enforcement agencies

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

- Credit referencing agencies for the purpose of verifying your identity and address, where this is necessary
- Third party product providers so that they can provide the products you have chosen
- Companies who provide services to us, for example:
  - suppliers who support us in distributing our letters to you
  - suppliers who provide information technology services to us or to your Financial Adviser
  - market analysis companies who use aggregated and anonymised client information for analysis purposes

In most cases, the ability of our third parties to use your information is limited and we will only allow them to use your personal information 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 information they do so in the way set out in this privacy policy and in compliance with law.

We may share your personal information within M&G plc for any of the purposes set out in section 5.

From time to time we will share your personal information with your Financial Adviser and Discretionary Fund Manager (if you have appointed one) and service providers so that they can help us carry out our duties, in relation to the services we provide to you. Some of those organisations will process your personal information on our behalf and in accordance with our instructions. Other organisations will be responsible to you directly for their use of personal information that we share with them. You can contact us directly, using the contact details in Section 1, to find out more.

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.

## 8 How do we protect your personal information?

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

The online service and Platform 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 information?

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

If you open an Account with us, we will keep your personal information for the period for which you remain a customer, plus the length of time dictated to us by applicable law after your Account has been closed.

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

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

## 10 What are your rights?

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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](mailto:platformsubjectaccessrequests@mandg.com). We will respond to all such requests within the time period required by law.

If you have any concerns about the use of your personal information, or the way we handle your requests relating to your rights, you can raise a complaint directly with us using the contact details below.

### Call us

**0345 120 3022**

We're open Monday to Friday 9:00am – 5:00pm. Call 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](mailto:platformcomplaints@mandg.com)

If you are not satisfied with the way we handle your complaint, you are entitled to raise a complaint directly with the UK Information Commissioner's Office via the details available on their website: [ico.org.uk](https://ico.org.uk).

For alternate EU Data Protection Authority contacts please see further information on the following link: [National Data Protection Authorities](#)



# 11 What are Cookies?

A cookie is a tiny text file that a website can store on your computer and can be read on following visits. This allows that website to identify you and, for example, remember to log you in the next time you visit.

How long a cookie stays on your computer or mobile device depends on whether it is a “persistent” or “session” cookie. Session cookies only stay on your device until you leave the site. Persistent cookies remain until they expire or are deleted.

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 whilst you are logged in, the system will automatically log you out.

There are different types of cookies used for different purposes. Some cookies are essential to the operation of the platform and others help us to improve our service by collecting information. The cookies we use are listed below under the four cookie categories:

## 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 the below strictly necessary cookies:

Name	Purpose	More information
Session ID	This cookie is set by Broadridge when logging into the platform	Session For more information you can view Broadridge’s privacy policy at: <a href="https://www.broadridge.com/intl/legal/privacy-statement-english">https://www.broadridge.com/intl/legal/privacy-statement-english</a>
___RequestVerificationToken	This is an anti-forgery cookie	Session
civicCookieControl	This cookie is used to record whether or not visitors have seen a message about cookies being used on the site, in compliance with cookie law	Persistent
12152EAC-B00E-4694-906F-42B5A9FF700D	This cookie is used to ensure you see the correct information and branding	Session
9A5A54D8-C34F-4A29-95B9-2C188240905D	This cookie is used to ensure you see the correct information and branding	Session
OptanonConsent	This cookie is set by the cookie compliance solution from OneTrust. It stores information about the categories of cookies the site uses and whether visitors have given or withdrawn consent for the use of each category.	Expiration: 1 year persistent

## 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.

We use the below performance cookies:

Name	Purpose	More information
<p>Adobe analytics cookies:</p> <ul style="list-style-type: none"> <li>• s_ecid</li> <li>• AMCV_210BDD9D56D6C97D7F000101</li> <li>• gpv</li> <li>• s_sq</li> <li>• s_cc</li> </ul>	<p>These cookies are used to collect information about how visitors use the platform. We use the information to compile reports and to help improve our online service. The cookies collect information in an anonymous form, including the number of users, where visitors have accessed the <a href="#">platform</a> from and the pages they visited.</p>	<ul style="list-style-type: none"> <li>• Expiration: 2 years persistent</li> <li>• Expiration: 2 years persistent</li> <li>• This cookie is a session cookie and expires when the browser is closed</li> <li>• This cookie is a session cookie and expires when the browser is closed</li> <li>• This cookie is a session cookie and expires when the browser is closed</li> </ul> <p>For more information about Adobe analytic's cookie's, read here:  <a href="https://experienceleague.adobe.com/docs/core-services/interface/ec-cookies/cookies-analytics.html">https://experienceleague.adobe.com/docs/core-services/interface/ec-cookies/cookies-analytics.html</a></p>
<p>Vimeo cookies</p> <p>You can find more information on Vimeo cookies at:  <a href="https://vimeo.com/cookie_policy">https://vimeo.com/cookie_policy</a></p>	<p>Vimeo uses cookies on Vimeo.com and related domains and applications (the "Vimeo Service"). We embed Vimeo videos within the <a href="#">platform</a>. This means that the cookies Vimeo use will apply to the user. By using the Vimeo Service, the user consents to the use of these cookies.</p>	<p>For more information you can view Vimeo's privacy policy at:  <a href="https://vimeo.com/privacy">https://vimeo.com/privacy</a></p>

## 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.



## 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](mailto:platformsupport@mandg.com)

### Copyright Notice

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