



Website Privacy Policy

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IFSL Administration Limited takes the privacy and security of your personal information very seriously, and we're committed to protecting and respecting your privacy.

In this notice when we use “IFSLA”, “we”, “us” and “our”, we’re referring to IFSL Administration Limited.

For the purposes of data protection law, IFSLA is a data controller in respect of your personal data and we are registered with the UK Information Commissioner's Office.

Our Privacy Policy explains which personal information we collect from you, how we store it and use it. It also covers how we treat information you give to us, and information we take from third parties. It contains important information about your rights.

The Privacy Policy applies to (i) any person whose personal data has been provided to us in connection with the provision of our services (which could include a director, partner, trustee, employee, agent or direct or indirect owner of an applicant); or (ii) where we otherwise use a person’s personal data. For the purpose of this Data Protection Privacy Notice, a reference to “you” and “your” shall include the client of IFSLA who opens an Account, as well as any connected individual described.

In this policy we explain:

1. Who we are:

2. Types of personal data we collect:

a) Information that you provide:

b) Information that we collect or generate about you:

c) Information that we obtain from other sources:

3. How we use your information:

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1. Who we are:

This privacy Policy is provided on behalf of IFSL Administration Limited.

We're registered in the UK, with our registered office address at Marlborough House, 59 Chorley New Road, Bolton, BL1 4QP. Further company information can be found at our website www.marlboroughadvisersolutions.com

We're authorised and regulated by the Financial Conduct Authority (FCA) and our registered number is 141660.

We may also obtain and send your data to other companies within our group where those group companies are also providing you with services. This may include Marlborough Fund Managers Limited (MFM), Marlborough Investment Management Limited (MIM) and Investment Fund Services Limited (IFSL). For details of those companies and their respective privacy policies please see:

<https://www.marlboroughfunds.com/data-privacy/>

<https://marlboroughinvests.com/privacy-policy/>

<https://ifslfunds.com/data-privacy/>

2. Types of personal data we collect:

Many of the Services offered by IFSLA require us to obtain Personal Data about you in order to perform the Services we've been engaged to provide. We may collect and process the following personal data about you:

a) Information that you provide:

This includes information that you have provided to us, or, the applicant in connection with your Account, your investments offered through our Platform or your use of the Services.

This might include your name and address (including proofs of name and address), contact details, date of birth, gender, nationality, photograph, signature, copies of identity documents, occupational history, job title, income, assets, other financial information, bank details, investment history, tax residency and tax

identification information. Such information might be provided in an Application Form or in other documents (as part of an application process or at other times), face-to-face, by telephone, by email or otherwise.

b) Information that we collect or generate about you:

This might include information relating to your (or an applicant's) investments in investments offered through our Platform, your Account and transactions, use of the Services, a record of any correspondence between you and us (or our representatives), any recordings of telephone calls and website use data.

c) Information that we obtain from other sources:

This might include information obtained for the purpose of our know-your-client procedures (which include anti-money laundering procedures, counter-terrorist financing procedures, politically-exposed-person checks, sanctions checks, among other things), information from government or public bodies, public websites and other public sources and information received from the applicant's advisers or intermediaries.

3. How we use your information:

We use your personal information in the following ways:

- to set up and manage your Account and/or process your transactions in investments offered through our Platform, including to perform anti-money laundering and know-your-client procedures, fact find procedures, receiving payments from and making payments to you, calculating net asset value and more generally to perform Account opening processes, arrange investment activity on your behalf and to oversee those processes;
- to manage our relationship with you and your adviser, including by maintaining our database of clients and other third parties for administration, accounting, support and relationship management purposes;
- to provide you or your adviser with information on products you may have requested through the Service, to notify you about changes to the Service and to ensure the on-going accuracy and relevance of such data;

- to complete our contractual obligations to you, or otherwise taking steps as described in our engagement terms and/or Client Agreement (including any associated administration);
- general business administration, including communicating with you and your advisers, communicating with service providers and counterparties, responding to any query that you may submit to us, accountancy and audit services, risk monitoring, the administration of IT systems;
- compliance with legal and regulatory obligations and industry standards, including know-your-client procedures, fact-find procedures, the automatic exchange of tax information and legal judgments;
- for general internal research purposes, including to identify and analyse the regularity of use of particular aspects of the Service and the nature of the Service's users;
- in respect of information shared with investment manager(s) appointed in respect of any of your investments (and its/their affiliates), business activities relating to your investments, such as investor relations, discussions with service providers and counterparties, decision-making in relation to your investments, and business strategy, development and marketing;
- to improve the design of products and Services for your use; and
- to market certain products, Services, events and content that may be of interest to you but only if you have given us your consent to do so or we are otherwise able to do so in accordance with applicable legislation.

4. Legal basis for using your information

We're entitled to process your personal data in the ways described above in this Privacy Policy for the following reasons:

- if you're a client, you may enter into a contract with us and some processing will be necessary for the performance of that contract, to provide the Service to you and to satisfy our obligations to you, or will be done at your request prior to entering into that contract. We would not be able to act for you without this personal data;

- processing may be necessary to discharge a relevant legal or regulatory obligation;
- the processing will, in all cases, be necessary for the legitimate business interests of us (or one or more of our affiliates), an investment manager appointed in respect of your investments, or another person, such as:
 - carrying out our ordinary or reasonable business activities, or those of the applicable investment manager, or other persons, or other activities previously disclosed to our clients/investors or referred to in this Privacy Notice;
 - ensuring compliance with all legal and regulatory obligations and industry standards, and preventing fraud;
 - establishing, exercising or defending legal rights or for other purposes relating to legal proceedings;
 - ensuring the security of information systems; and
 - conducting marketing and promoting our business, products and Services.
- in respect of any processing of sensitive personal data falling within special categories, such as any personal data relating to the political opinions of a politically exposed person, the processing will be necessary for reasons of substantial public interest.

If we rely on your consent for us to use your personal information in a particular way, but you later change your mind, you may withdraw your consent by contacting us at our registered address and we will stop doing so.

5. Disclosure of personal data to third parties

We may from time to time, in accordance with the purposes described in this Privacy Policy above, disclose your personal data to other parties, including:

- other members of IFSLA's group,
- the investment managers and its/their affiliates appointed in respect of your investments,

- the provider of our Platform technology
- professional advisers such as law firms and accountancy firms,
- other service providers, agents and contractors,
- counterparties and
- courts and regulatory, tax and governmental authorities.

Some of these persons will process your personal data in accordance with our instructions and others will themselves be responsible for their use of your personal data. These persons may be permitted to further disclose the personal data to other parties.

6. Transfers of your personal data outside of the United Kingdom

We usually store your information on our secure servers in the United Kingdom.

However, your personal data may be transferred to and stored by persons outside of the United Kingdom and in particular may be transferred to and stored by our affiliates or service providers.

Where personal data is transferred to a third country, we'll ensure that the transfer is subject to appropriate safeguards or is otherwise permitted under applicable law. For example, the country to which the personal data is transferred may be approved by the European Commission, the recipient may have agreed to model contractual clauses approved by the European Commission that oblige them to protect the personal data, or the recipient may be located in the United States and be a certified member of the EU-US Privacy Shield scheme.

You can obtain more details on the protection given to your personal data when it's transferred outside the UK, including a copy of any standard data protection clauses entered into with recipients of your personal data, by contacting us using the details set out under "Contacting us" in this Privacy Notice.

7. Necessity of personal data

The provision of certain personal data is necessary for us to provide the Service and for our compliance (and that of our service providers) with certain legal and regulatory obligations. Accordingly, if certain personal data isn't provided when requested, an application to become a client might not be accepted, or this may have other repercussions for your investments.

8. How we safeguard your information

We have extensive controls in place to maintain the security of our information and information systems. Appropriate controls (such as restricted access) are placed on our computer systems. Physical access to areas where Personal Data is gathered, processed or stored is limited to authorised employees.

Unfortunately, the transmission of information via the internet is not completely secure and although we do our best to protect your personal data, we cannot absolutely guarantee the security of your data.

As a condition of employment, all employees are required to follow all applicable laws and regulations, including in relation to data protection law. Unauthorised use or disclosure of confidential client information by an employee is prohibited and may result in disciplinary measures.

9. How long we keep your personal information

We keep the personal information we collect from you and other third parties where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).

How long we hold your personal data for will vary. The retention period will be determined by various criteria including:

- the purpose for which we're using it – we'll need to keep the data for as long as is necessary for that purpose; and
- legal obligations – laws or regulation may set a minimum period for which we've to keep your personal data.

When we have no ongoing legitimate business need to hold your personal information, we'll delete it. If we can't do this (for example, because your personal information is stored in backup archives), we'll securely store your personal information, only use it for a purpose we've already communicated to you, and isolate it from any further processing until archives are deleted.

10. Marketing

We may collect and use your personal information for undertaking marketing by email, telephone and post.

We may send you certain direct marketing communications (including electronic marketing communications to existing customers) if it's in our legitimate interests to do so for marketing and business development purposes.

However, we'll always obtain your consent to direct marketing communications where we're required to do so by law.

You have the right to ask us not to process your personal information for marketing purposes. You can do this by contacting us by post or email using the details in the "Contacting us" section below.

11. Your rights

You have various rights under data protection law, however, these will not always be relevant or applicable to you – depending on the circumstances. These rights include the following:

1. The right to obtain access to personal data that we hold about you and certain prescribed information about how we process it. This is more commonly known as submitting a "**data subject access request**". Under data protection laws in the UK you have a right to obtain copies of, or access to, your personal and financial information which we hold as data controller (subject to certain exemptions).
2. The right to obtain from us without undue delay the rectification of inaccurate personal data and to have incomplete personal data completed in certain circumstances.

3. The right to obtain from us the erasure of personal data without undue delay in certain circumstances (also known as the “**right to be forgotten**”). This right is not absolute – it applies only in particular circumstances and where it does not apply any request for erasure will be rejected. Circumstances when it might apply include where the personal data is no longer necessary in relation to the purpose for which it was originally collected/processed, when consent is withdrawn (if relevant), when the individual objects to processing and there is no overriding legitimate interest for our continuing the processing personal data, if the personal data is unlawfully processed, or if the personal data has to be erased to comply with a legal obligation.
4. The right to obtain the restriction of processing of your personal data may be relevant if you contest the accuracy of your personal data (which is proven to be correct); when the processing is unlawful and you request that use of the personal data is restricted and where you do not want erasure instead; or when we no longer need to process the personal data but you require the personal data to be retained in case of future legal claims.
5. The right to data portability where the personal data is processed by us based on consent, a contract, or using automated means (as relevant). This right allows individuals to obtain and reuse their personal data for their own purposes across different services without hindrance to usability. It is important to understand that this right is different from the right of access (see above) and this means that the types of personal data that you can receive through the right of portability are different to the types you could receive under the right of access.
6. The right to object to processing of your personal data – this right allows individuals in certain circumstances to object to processing based on legitimate interests, including profiling based on legitimate interests; direct marketing; and processing for purposes of statistics.
7. Rights relating to automated decision making about you including profiling (as relevant) if this has a legal or other significant effect on your as an individual – this right allows individuals in certain circumstances to access

certain safeguards against the risk that a potentially damaging decision is taken without human intervention.

If you wish to exercise any of the above rights in relation to the personal data we hold about you, please use the information provided in the “Contact Us” section below.

We’ll consider all such requests and provide our response within a reasonable period (and in any event within one month of your request, unless we tell you we’re entitled to a longer period required by applicable law). Please note, however, that certain personal information may be exempt from such requests in certain circumstances, for example if we need to keep using the information to comply with our own legal obligations or to establish, exercise or defend legal claims. If an exception applies, we’ll tell you this when responding to your request. We may need you provide us with information necessary to confirm your identity before responding to any request you make.

You can find out more information about your rights by contacting the UK’s Information Commissioner’s Office (ICO), or by searching their website at <https://ico.org.uk/>.

12. Children

We don’t and won’t knowingly collect information from any unsupervised child under the age of 13. If you’re under the age of 13, you may not use our sites unless your parent or guardian has provided us with their consent for your use of our sites or our site (as applicable).

13. Cookies

Our websites use cookies. Cookies are very small text files that are stored on your computer each time you visit our website. We use cookies to help identify your computer so that we can tailor your experience. You can disable any cookies already stored on your computer, but these may stop our website from functioning properly. For more information on the cookies we use, please see our Cookie Policy at www.marlboroughadvisersolutions.com

14. Updating this Privacy Policy

We'll update or amend this Policy from time to time, to comply with law or to meet our changing business requirements. You should bookmark and periodically review this page to make sure that you're familiar with the most current version and so you're aware of the information we collect, how we use it and under what circumstances we disclose it. You can see when our most recent update to this Privacy Policy was by checking the "Last updated" note at the top of this Policy.

15. Contacting us

If you have any questions about your privacy with us or this Policy, you can contact us at:

Address: Compliance Officer, IFSL Administration Limited, Marlborough House, 59 Chorley New Road, Bolton BL1 4QP

Email: platform.compliance@marlboroughgroup.com

Telephone: **0117 2051276** (normally free in the UK), or on +44 117 2051276 (from outside the UK). We're here 9:00am to 5:00pm, Monday to Friday.

If you would like to download this Notice as a PDF [click here](#).