



Privacy Policy

Contents

1	Why have a privacy policy?	3
2	What personal data do we collect about you and how?	3
3	How do we use your personal data?	4
4	Credit reference, fraud prevention agencies regulators and tax authorities	5
5	Who is your personal data shared with?	6
6	Safeguarding your personal data	7
7	What are cookies and how do we use them?	7
8	Sale of the business	7
9	Third party links	7
10	Your rights and contacting us	8

Interactive Investor Services Limited, the provider of execution only Stockbroking Services (“Interactive Investor”), is committed to providing you with the highest quality service. This includes maintaining your privacy and protecting your personal data. This policy, read together with our Terms of Service and our Cookies Policy, explains what we and our Group companies do with the personal data we collect about you. We will tell you which companies are in our Group upon request. Our contact details are set out at the end of this policy.

To get the best from our services, please keep your personal data (including your email address) accurate and up to date. You can do this by contacting us at the address or telephone number given at the end of this policy or by logging into our secure website and selecting: Account > Personal details and Preferences.

Please take the time to read this policy carefully. In opening an account with us and/or providing any personal data to us via our website, you acknowledge that your personal data will be used in accordance with our Terms of Service at www.ii.co.uk/legal and this policy.

Interactive Investor will be the data controller of your personal data which you provide to us or which is collected by us when you open an account with us or via our website. You can contact our Data Protection Officer via email at dataprotection@ii.co.uk or using the postal address given at the end of this policy.

1 Why have a privacy policy?

Information that identifies or can be used to identify a living individual is known as “personal data.” All organisations processing personal data must do so fairly, lawfully and in accordance with applicable data protection laws. This includes the obligation for us to tell you how we will use your personal data. We treat all of our legal obligations seriously and take all steps necessary to ensure compliance when storing and processing your personal data.

2 What personal data do we collect about you and how?

We may collect the following information about you:

- your contact details such as your name, address, telephone number and email address;
- your date of birth, nationality, country of birth, country of residence, employment status and tax identification number (e.g. National Insurance Number);
- passport details, driving licence and utility bills; and
- details of the services you request from us.

We collect your personal data in a number of different ways, including the following:

- if you provide it when communicating with us (for example when registering for our services);
- if you order any of our products or services;
- if you enter a competition or promotion;
- if you make payments or modify your account details; and
- when you visit our websites (for example by cookies, your IP address and other browser-generated information). More information is provided in our Cookies Policy at www.ii.co.uk/cookies.

We record all service calls for quality and training purposes, to enable us to deal effectively with queries and complaints and, in the case of calls where customers place transactions on regulated markets, in order to comply with our regulatory obligations.

In most cases you are not obliged to provide any personal data to us, but if you have requested information or a service from us, we will not be able to provide it without certain information, such as your contact details. If you have ordered a service from us, it will be a statutory requirement for us to obtain, and a contractual requirement for you to provide, certain information so that we can verify your identity in order for us to meet our obligations under the Money Laundering Regulations 2007 and any other applicable legislation for the purposes of crime prevention and credit risk reduction. You are obliged to provide this information in order for us to provide the service and, if you fail to provide it, we will be unable to provide the service.

3 How do we use your personal data?

We will access and disclose your personal data if we are required to do so by law (or if we reasonably believe we are required to do so by law), and to the extent it is necessary for the proper operation of our systems, to protect us/our customers, or for the enforcement of our Terms of Service.

We retain and use your personal data for the following purposes:

- processing applications made by you, running your accounts, providing our services, contacting you and servicing our relationship with you;
- administration and accounting, billing and auditing and other legal purposes;
- to carry out checks on you, such as credit checks, identification verification checks and anti-money laundering checks, for the purposes of meeting our obligations under the Money Laundering Regulations 2007 and any other applicable legislation, for the purposes of crime prevention and credit risk reduction;
- security, payment verification, debt tracing and debt recovery;
- dealing with any queries, complaints or problems reported by you;
- enabling you to participate in our promotions and competitions;
- enabling you to participate in the interactive features of the website and ensuring content from our website is presented in the most effective manner for you and your computer or device;
- notifying you about changes to our service and/ or the terms on which the services are provided;
- generating statistics on our users, such as the popularity of certain of our services and about the “traffic” visiting our websites. Before doing this your personal data is anonymised and you are not personally identifiable; and
- to provide you with information about goods or services we feel may interest you in accordance with applicable laws:
 - If you are an existing customer, we will only contact you by e-mail or SMS with information about goods and services similar to those which were the subject of a previous sale or negotiations for a sale to you and if you have not opted out of receiving such communications.
 - If you are a new customer we will contact you by email and SMS only if you have consented to this.
 - We will only contact you using automated calls if you have consented to this.

- If you do not want us to use your data in this way, you can record your preference when we initially obtain your details, contact us in writing at any time or opt out to receiving marketing by SMS or email as specified in the relevant marketing communication. Opting out from such communications will not prevent us from communicating with you as necessary to manage your account. Please click here for details of our products and services.

In order to monitor and analyse our business we, or a third party acting for us, may use information in your customer and account records to assess customer satisfaction and for market research. If you do not wish to be contacted to participate in customer satisfaction or marketing surveys, you can opt out by asking us and our third parties to stop contacting you by writing to us or by opting out by SMS or email as specified in the relevant communication. This request will not affect the running of your existing account or the services you request from us, in respect of which we will still process your personal data.

Unless stated otherwise in this privacy policy, the legal basis for our use of your personal data will be that this information is required for one or more of the legitimate interests described above.

Automated Decisions

As part of our account-opening process we will carry out automated checks using your personal data, such as your name, postal address, date of birth, telephone numbers and employment status. These checks include credit checks, identification verification checks and financial crime checks and involve our obtaining information (such as your credit history) from credit reference agencies and any records held by financial crime prevention agencies, the Electoral Register and providers of utility services. We need to carry out these checks in order to meet our obligations under the Money Laundering Regulations 2007 and any other applicable legislation and for the purposes of credit risk reduction. The information obtained from these checks is used by us (together with information provided by you in your application) to build a 'scorecard' relating to the applicant which is used to determine if an account can be opened, whether further information is required or the application is rejected, based on factors such as whether we have been able to verify your identity, your credit history and any records relating to financial crime.

Data Retention

We will only keep your personal data for as long as we need to in order to fulfil the relevant purpose(s) it was collected for, as set out above in this privacy policy and for as long as we are required to keep it by law. We retain copies of our customer contracts in order to enable us to deal with any legal issues along with the information provided to us for identification verification checks and anti-money laundering checks (as required by law) for 6 years after termination or expiry of our contract with you. Details of complaints are retained for 5 years from receipt in accordance with the DISP chapters of the FCA Handbook and telephone call recordings are retained for 5 years from the date recorded in accordance with the COBS chapters of the FCA Handbook. If you have a query in relation to how long we retain your personal data for, please contact us using the contact details provided below.

4 Credit reference, fraud prevention agencies regulators and tax authorities

If you apply to open an account with us or where you apply for additional services, we will make searches about you at credit reference agencies who will supply us with credit information, as well as gathering information from the Electoral Register and providers of utility services for the purposes of credit risk reduction. You are obliged to provide us with the personal information which we need to carry out these searches. If you object to us carrying out these searches, we will not be able to provide you with the services you requested from us. The agencies will record details of the search whether or not your application with us proceeds. We may make periodic searches of our records and those of Group companies, credit reference

and financial crime prevention agencies, to manage your account with us and to make credit related decisions about you, including whether to make an account available or to continue our relationship. We and other organisations who may be from other countries may access and use the information recorded by financial crime prevention agencies.

We may give details of your account and how you manage it to credit reference agencies. If you do not repay sums due in full and on time, we may tell credit reference agencies who will record such details.

To prevent or detect financial crime, or to assist in verifying your identity in order to fulfil our legal obligations, we may make searches at financial crime prevention agencies. We may also pass information to financial and other organisations involved in financial crime prevention to protect ourselves and our customers from theft and fraud. If false or inaccurate information is provided and financial crime is identified or reasonably suspected, details will be passed to financial crime prevention agencies who will record this. Law enforcement agencies may access and use this information. We, other Group companies and other organisations may also access and use this information to prevent financial crime, for example, when:

- checking details on applications for credit, credit related services or other facilities;
- managing credit and credit related accounts or facilities;
- recovering debt;
- checking details on proposals and claims for all types of insurance; or
- checking details of job applicants and employees.

We may disclose your personal information to third parties, the court service, regulators or law enforcement agencies in connection with enquiries, proceedings or investigations by such parties anywhere in the world or in order to enable us and other relevant Group companies to comply with their regulatory requirements or dialogue with its regulators as applicable.

International regulations regarding the automatic exchange of information require financial institutions to collect and report certain information about an individual's tax residency. We may be legally obliged to pass on your personal information to tax authorities who may, under inter-governmental agreements, exchange this information with tax authorities in other jurisdictions.

You have a right of access to your personal records held by credit reference and financial crime prevention agencies. Please contact our Data Protection Officer if you want to receive details of the relevant credit reference or financial crime prevention agencies.

5 Who is your personal data shared with?

You acknowledge that we may disclose your personal data to:

- entities within our Group;
- third parties which we use to carry out the checks that we need to carry out on you, such as identification verification, anti-money laundering and credit reference checks, including credit reference agencies, financial crime prevention agencies and utility companies; and
- other service providers that may be located in or outside the European Economic Area (EEA).

Third parties who your personal data is disclosed to may only use it for the purposes set out in this policy.

When we transfer your data to a service provider outside of the EEA, we ensure that appropriate controls are in place to protect your data in accordance with applicable data protection laws, such as:

- the European Commission has made an official decision that the recipient country is a 'safe' country for the receipt of personal data; or

- we have entered into a form of contract with the service provider which has been approved by the European Commission as providing adequate protection for personal data, or if the service provider is in the US, it has self-certified to the EU/US Privacy Shield Framework.

For details of the transfers of or access to personal data outside of the EEA and the safeguards that we have in place when transferring, or allowing access to, your personal data outside of the European Economic Area, (and for a copy of the safeguards, where applicable) please contact our Data Protection Officer via email at dataprotection@ii.co.uk or using the postal address given at the end of this policy.

6 Safeguarding your personal data

We take all reasonable care in the collection, storage, processing and disclosure of your personal data and have implemented internal security procedures to minimise the risk that unauthorised parties will be able to access and misuse the information. It is because of these security procedures that we may ask for proof of identity before we disclose any personal information about you.

The internet is an open medium and we cannot guarantee that any information you send to us by email or via our website will not be intercepted or tampered with. To help protect your personal data and minimise the risk of it being intercepted by unauthorised third parties our secure servers employ industry standard Secure Socket Layer (SSL) or Transport Layer Security (TLS) encryption when you submit information to us through our website. This security is signified by the “https” designation and the padlock on the URL bar. Some older browsers do not allow the use of current SSL technology and we therefore recommend that you use an up to date browser for example Microsoft Internet Explorer 8.0 or above.

You can also help to protect your personal data, by following the guidelines below:

- choose a password that you will be able to remember but that would be hard for someone to guess. Ideally it should include special characters (such as “?” or “#” for example) and numbers. We recommend that you change it regularly and if you need to write it down, always keep it in a safe place;
- make sure that no-one can see the details you are entering when you log-in;
- if other people have access to your computer, remember to close your browser each time you log-off and end your session and, if possible, clear any history of the websites you have visited and that your browser may have saved or “cached”; and
- never disclose your account details to anyone.

For more information and top tips please [click here](#).

7 What are cookies and how do we use them?

Our website uses cookies to distinguish you from other users of our website. This helps us provide you with a good experience when you browse our website and allows us to improve our site. For more detailed information on the cookies we use and the purpose for which we use them see our Information about Cookies at www.ii.co.uk/cookies.

8 Sale of the business

In the event that we are sold (fully or partially), integrated with another business or dispose of our rights and obligations under any agreement with you, your records may be disclosed under appropriate confidentiality terms to our advisers and any prospective purchasers' advisers, and will be passed onto the new owners.

In the event that we buy any business or assets, we may disclose your personal data to the prospective seller of such business or assets under appropriate confidentiality terms.

9 Third party links

Please bear in mind that this policy only applies to websites and services operated by us and not those operated by third parties, including those to which our websites may link. We suggest that you make yourself familiar with any privacy policy provided by such third party websites before providing personal information about yourself.

10 Your rights and contacting us

You have the following rights (unless exemptions apply), which can be exercised by contacting our Data Protection Officer using the details provided below.

The right:

- to ask us not to process your personal data for marketing purposes;
- to access personal information held about you and to obtain a copy of it;
- to prevent any processing of a record of personal data that is causing or is likely to cause unwarranted and substantial damage or distress to you or another individual;
- to obtain the rectification or completion of records of personal data which are inaccurate or incomplete;
- to restrict or object to the processing of your personal data and to request its erasure under certain circumstances. We will not be able to erase personal data where we have a legal obligation to retain such data for example the results of identity verification checks;
- in certain circumstances, to receive your personal data, which you have provided to us, in a structured, commonly-used and machine readable format and the right to transmit that data to another data controller without hindrance, or to have that personal data transmitted to another data controller, where technically feasible; and
- to lodge a complaint about the way in which your personal data is being shared with a supervisory authority.

Where we rely on your consent to use your personal data, you have the right to withdraw that consent at any time.

If you have any queries about this policy or our use of your personal data, please contact our Data Protection Officer at dataprotection@ii.co.uk or in writing at:

Interactive Investor

Exchange Court, Duncombe Street, Leeds, LS1 4AX

If you have any queries about any of the Terms of Service or the website in general, do not hesitate to contact us at:

Customer Services

Interactive Investor, Exchange Court, Duncombe Street, Leeds, LS1 4AX

Tel: 0345 607 6001

Email: interactivehelp@ii.co.uk