

P1 Investment Management

Privacy Notice and GDPR (relating to Platform Accounts) v2

August 2020

Privacy Notice relating to P1 Platform Accounts

This privacy notice explains how we use any personal information we collect about you and how we comply with the General Data Protection Regulations, effective from 25 May 2018.

We have adopted the following privacy policy as part of our commitment to protect any personal information (“Personal Information”) which you may provide to us through this website or by any other means. Any change to this Privacy Policy will be posted on this website and will become effective 5 days after posting. Please note that this Privacy Policy does not apply to other websites linked through this website. Personal Information which you choose to provide to other websites will be subject to the privacy policies of those websites.

We will not use or disclose your personal information unless you have given your permission, except for the following purposes:

1. to assess, operate and improve this website and to perform the services for which we are responsible, including notifying your personal information to manufacturers, suppliers and designers with whom you wish to do business through this website;
2. to keep you informed about our services and about this website; and
3. if we are required to disclose such Personal Information by any applicable law, regulation or legal process.
4. You agree that if we transfer ownership or management of the site to a third party or if we merge with or are bought by another firm we may also transfer your data to such third party or the new entity, provided such third party or new entity agrees to observe this policy.
5. We will not sell, trade or rent your personal information to others unless you have given your permission. With your permission, we will only share your personal information with carefully chosen, reputable and trustworthy third parties. We will follow the relevant legal requirements and use all reasonable precautions to ensure that only responsible third parties see the personal information. However, we are not responsible for any breach of security or any act or omission of third parties who receive the personal information.
6. In addition to the use of your personal information as described above, we may also gather anonymous information which may be used by us or shared with third parties. This is information which does not identify you, but which may be helpful for marketing purposes or for improving this website or the services provided through it.
7. This website uses, or may from time to time use, Cookies. Cookies are pieces of information that a website transfers to your computer’s hard disk for record-keeping purposes and they can make the World Wide Web more useful by storing information about your preferences on a particular site. The use of Cookies is normal practice in the industry and many major websites use them to provide useful features for their customers. Cookies do not personally identify users but they do identify a user’s computer. Most browsers are initially set to accept Cookies. If you prefer, you can set your browser to refuse Cookies.

8. Parts of our site contains links to third party websites and we are not responsible for any site you choose to visit in this way. Our site does not have a secure transmission method. Thus it is possible that the information can be intercepted, lost, redirected, changed and read by other people. However, we value your trust and are committed to protecting the information you provide. To prevent unauthorised access, maintain accuracy and ensure proper use of information, we have employed physical, electronic and managerial processes to safeguard the information we collect on-line.
9. All of our employees and data processors that have access to, and are associated with the processing of personal data, are obliged to respect the confidentiality of our visitors' personal data.
10. We have systems that protect our clients and ourselves against fraud and other crime. We may use your personal information to prevent crime and trace those responsible. We may check your details with fraud prevention agencies. If you give us false or misleading information and we suspect fraud, we will record this. We and other organisations may use and search these records to help us trace debtors, recover debt, prevent fraud and to manage your accounts, or check your identity to prevent money laundering, unless you provide us with other satisfactory proof of identity.

If you require up to date T&C's please contact us using the details below. If you have any questions or wish to have any personal information edited or deleted, please e-mail or write to the Compliance Director at the address below.

What information do we collect about you?

We collect information about you when you register on the P1 Platform and when you open an Investment Account such as an ISA, GIA or SIPP. This information will relate to your personal circumstances and records of instructions received through the Platform. We also collate details of any transactions you make on your Investment Account, or your Financial Adviser or (where applicable) Discretionary Fund Manager instruct us on your behalf.

We may also collect information when you voluntarily complete client surveys or provide feedback to us.

Any questions about our Platform should be directed to your Financial Adviser in the first instance. Please be aware that if you contact us by telephone for any reason, calls may be recorded for monitoring and quality control purposes and to ensure we meet our regulatory requirements.

In common with other websites, we collect information relating to usage using cookies. These are text files placed on your computer when you visit our website to collect standard internet log information and visitor behaviour information. We'll use your information collected from the website to personalise your repeat visits to the site. Further details can be found on our Website Privacy Policy.

Why do we need to collect and use your personal data?

The primary legal basis that we intend to use for the processing of your data is for the performance of our contract with you for the operation of your Platform Account. The information that we collect about you is essential for us to be able to carry out the services that you require from us effectively. When you register via our Platform you provide your consent for us to hold

your personal data. Without collecting your personal data we'd also be unable to fulfil our legal and regulatory obligations.

We may also contact you where we believe it is in your legitimate interests for us to do so.

We do not collect any special categories of data about you.

How will we use the information about you?

We collect information about you in order to provide you with the services such as account operation, administration and information you may need for your tax return.

Who might we share your information with?

We won't share your information for marketing purposes with other companies.

In order to deliver our services to you effectively we may send your details to third parties such as those that we engage for professional compliance, accountancy or legal services, those who maintain our IT systems and data, as well as our Custodian, Nominee and Platform Provider that we use to arrange financial products for you.

Where appropriate and current agreements are in place, you authorise us to provide details about the operation of your Platform Account with your Financial Adviser and (where applicable) any Discretionary Investment Manager you or your Financial Adviser appoint to provide investment management services relating to your Investment Accounts.

Where third parties are involved in processing your data, we have a contract in place with them to ensure that the nature and purpose of the processing is clear, that they are subject to a duty of confidence in processing your data and that they'll only act in accordance with our written instructions.

Where it's necessary for your personal data to be forwarded to a third party we'll use appropriate security measures to protect your personal data in transit, including the use of password protection and/or encryption of data.

To fulfil our obligations in respect of prevention of money-laundering and other financial crime, we will send your details to third party agencies for identity verification purposes. More information is available on the checks required in the Client Identification section on the Regulatory Information page of our website. We may also be required to pass your details to appropriate regulatory bodies or law enforcement agencies. Should this become necessary, we have the right to do so without contacting you first.

How long do we keep hold of your information?

In principle, your personal data shouldn't be held for longer than is required under the terms of our contract for services with you. However, we're subject to regulatory requirements to retain data for specified minimum periods. These are generally:

- Five years for investment business
- Indefinitely for pension transfers and opt-outs

We also reserve the right to retain data for longer than this where we believe it is in our legitimate interests to do so. In any case, we'll not retain your personal data for longer than six years past the time of your death.

You have the right to request deletion of your personal data. We'll comply with this request, subject to the restrictions of our regulatory obligations and legitimate interests as noted above.

How can I access the information you hold about me?

You have the right to request a copy of the information that we hold about you. If you'd like a copy of some or all of your personal information please email or write to us using the contact details noted below.

When your personal data is processed by automated means you have the right to ask us to move your personal data to another organisation for their use.

We have an obligation to ensure that your personal information is accurate and up to date. Please ask us to correct or remove any information that you think is incorrect.

Marketing

As our Platform is only available to clients who have a Financial Adviser, we do not market directly to Platform Account holders. We will communicate with you via the Communications Hub on the Platform and you may receive emails from us letting you know when there is a message for you to read.

This does not preclude your Financial Adviser from contacting you about any of our services that he feels may be of interest.

Cookies

We use cookies to track visitor use of the website and to compile statistical reports on website activity.

For further information visit <http://www.allaboutcookies.org/>

You can set your browser not to accept cookies and the above website tells you how to remove cookies from your browser. However in a few cases some of our website features may not function as a result.

Other websites

Our website may contain links to other websites. This privacy policy only applies to our Platform so when you link to other websites you should read their own privacy policies.

What can you do if you are unhappy with how your personal data is processed?

You also have a right to lodge a complaint with the supervisory authority for data protection. In the UK this is:

Information Commissioner's Office
Wycliffe House
Water Lane

Wilmslow
Cheshire
SK9 5AF

0303 123 1113 (local rate)

Changes to our privacy policy

We keep our privacy policy under regular review and we'll place any updates on our website. This privacy policy was last updated on 1st May 2019.

How to contact us

Please contact us if you have any questions about our privacy policy or information we hold about you:

Write to: Paul White, Compliance Director at P1 Investment Management Limited, Senate Court, Southernhay Gardens, Exeter EX1 1NT.

Or by email to: paulwhite@p1-im.co.uk