



Privacy Policy

A Platform Revolution

Introduction

This is our Privacy Statement which explains how we obtain, use, and keep your personal data safe in relation to the www.invinitive.co.uk website.

We collect and process some of your personal information to allow us to operate as a business, provide you with our services and to meet the legal obligations we have, as a regulated financial services firm.

Invinitive Financial UK Ltd takes the privacy and security of your personal information very seriously, and we're committed to protecting and respecting your privacy.

This notice applies to individuals who receive our services, as well as individuals who occupy the office locations of our UK premises, including staff, volunteers, candidates, contractors, graduates, apprentices, temporary staff, agency workers, interns, work experience and consultants.

Invinitive Financial UK Ltd is a financial services technology company. We use a number of third parties to carry out specific business functions. These third parties may require us to share your information with them.

Our Privacy Notice explains to you what personal information we will collect from you during our onboarding process and in an ongoing capacity, how we store it and how we use it. It also covers how we handle the information you give to us, along with any information we take from third parties. It contains important information about your rights. By engaging with us in the ways set out in this notice, you confirm that you have read and understood the entirety of this notice as it applies to you.

Who we are

Invinitive Financial UK Ltd is a company registered in England and Wales with company number 13086962 with its registered office address at 128 City Road, London, EC1V 2NX. Invinitive Financial UK Ltd is authorised and regulated by the Financial Conduct Authority (Firm Reference Number: 964301). Invinitive Financial UK Ltd is registered with the Information Commissioner's Office (ICO), the UK regulator for data protection matters, under no. ZA916504.

The types of personal data we collect and use

There are various types of data that we will capture and use during this process. The data collected will depend on what you are doing on our website. We'll use your personal data for some or all of the reasons set out in this Privacy Statement. If you become a client we will use it to manage the account and product you've applied for. Examples of the personal data we use in relation to our websites may include:

- Personal, residential and contact information including: full name, address, email address, telephone number, nationality, residency and citizenship, marital status, title, national insurance number and other national and tax authority identifiers.
- Socio-demographic information including: date of birth, sex, postcode, profession or employment, earnings.
- Financial information including: bank account details, credit and debit card details, source of wealth.
- Transactional information including: payments to and from your accounts and instructions on your account.
- Technical information including: internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our websites, apps, products and services.
- Profile data including: username and password, preferences, feedback and survey responses.
- Usage information including: cookies, tags, tracking technologies and information about how you use our websites, apps, products and services.

- Special and one-off items of information including: health and illnesses, disabilities and special requirements, personal financial status (e.g. in relation to bankruptcy or insolvency), criminal convictions or offences.
- Marketing and communications information.

We also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data may be derived from your personal information but it does not reveal your identity. If we combine aggregated data with your personal information so that it can identify you, we will treat the combined data as personal data and use it in accordance with this policy.

How we collect your data

We will collect and process your information in these circumstances:

When you get in touch with us:

When you contact us you may need to give us your personal information either by phone, email, and via our websites, in writing or otherwise. This includes, but isn't limited to, information you give us when you open an account, request quotations, register for email alerts or request literature. The information you give us can include your name, address, email address and other contact information. It can also include your financial and bank information and other personal details such as your National Insurance number.

When you visit our website or use our equipment

When you visit our website we collect information such as the Internet Protocol (IP) address used to connect your computer to the internet, your login information, your geographic location, your browser and browser plug-in type and version, and your operating system and platform.

When we email you

When you open an email that we will have sent you, we have the ability to collect information including your geographic location, browser type and version, the device, and the operating system and platform you're using. We also collect information about your email consumption, including the full click path from within and on to our sites (including date and time), and whether you opened, deleted, forwarded, printed or unsubscribed from the email, and also how long the email was open.

Third parties provide information regarding you

During the onboarding process and in an ongoing matter we may seek and receive information about you from third party service providers such as credit reference agencies, payment service providers, outsourced service providers or analytics providers.

Please note that if we don't receive all of the personal information that we have requested from you, then we will not be able to open your account.

The legal basis for using your personal information

We will only collect, use and share your personal information where we are satisfied that we have an appropriate legal basis to do so, which depends on the exact type of information involved and how and when we collect it. This may be because:

- our use of your personal information is necessary to perform a contract or take steps to enter into a contract with you – for example, if you are an Invinitive customer;
- you have provided your consent to us using your personal information – for example, on a form or in correspondence with us;
- our use of your personal information is in our legitimate interest – for example, so we can verify your identity, communicate with you about our products and services and provide a safe environment for

our staff and website visitors. In these cases, we will process your personal information in a way that is proportionate and respects your privacy rights;

- our use of your personal information is necessary to comply with a relevant legal or regulatory obligation that we have - for example providing information to the FCA, HMRC or other regulatory authorities.

For special category data and criminal offence data, we process your personal information:

- where you have provided your consent;
- where it is in the substantial public interest – for example to safeguard economic wellbeing, to comply regulatory requirements, to prevent or detect fraud, money laundering or other dishonest or unlawful acts, to comply with equality laws;
- where we are defending or pursuing legal claims or exercising our legal rights;
- where you have made the information public.

If you would like to find out more about the legal basis for which we process personal information, please contact us.

How we use your information

We use your personal information for some or all of the following purposes (this list is not exhaustive):

- Verifying your identity, authority and eligibility in relation to the products and services we provide.
- Contacting you about our products and services.
- Complying with contractual obligations, regulatory requirements and in order to manage risk effectively.
- Verifying and carrying out instructions in relation to your account.
- Completing regulatory reporting and monitoring in relation to your account.
- Keeping your account safe from fraud and ensuring that payments to and from your account are made in accordance with fraud and money laundering guidance and regulations.
- Verify the device used to access our website or apps.
- Enhancing and developing our products and services, testing the quality and effectiveness of our products and services, and defining customer types and target markets.
- Understanding your circumstances, including to consider whether you require additional support.
- Passing limited information to third parties to enable them to meet their own business and regulatory requirements.
- For analysis and research, to train and support our staff, to provide management information or other services internally and to third parties.
- To tailor and customise our services, communications and marketing for you.
- To improve the performance of our online campaigns and for retargeting activities.
- To enhance your user experience and monitor site performance.
- To administer our sites and for internal operations, including troubleshooting, data analysis, load management, testing, research, statistical and survey purposes.

When we verify your identity and complete our onboarding and financial crime checks, we use systems that include automated decision making and profiling. We may also use profiling for our direct marketing activities. We are required to tell you about any automated decision making or profiling but we do not carry out these processing activities in a way that significantly affects you.

How we might share your data

We use third parties to help us provide our products and services which may require the sharing of your personal information. In some instances, we may share your information with a third party authorised to act on your behalf. There are also occasions where we are required to share your personal information with third parties. In all cases, we only share your personal information with third parties as far as it is necessary for them to carry out their function.

We may share your personal information with third parties, including:

- anyone authorised to act on your behalf;
- any member of the Invinitive group, which is made up of Invinitive Financial UK Ltd and its subsidiaries;
- business partners, suppliers and other third parties for the performance of any contract we enter into with them or you, including:
 - investment providers regulated and authorised to provide investment services in the UK;
 - data and software providers;
 - credit reference and fraud prevention agencies;
 - payment service providers;
 - advertising, analytics and search engine providers;
- regulators, official authorities, anti-fraud organisations.

We may disclose your personal information to third parties in the following circumstances:

- where it is in our legitimate interests;
- if we are required to disclose or share your personal data to comply with a legal or regulatory obligation, or to enforce or apply our rights under this policy, our terms and conditions and other agreements;
- if we are required to do so to protect the rights, property, or safety of any member of our group, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of identity checks, fraud protection and credit risk reduction.

We may also share your personal information with third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this policy.

Where we share your personal information with third parties, they will determine how long they hold it for, which is based on a range of factors including the reason it was collected and any applicable legal or regulatory requirements.

We and fraud prevention agencies will use your personal information to enable law enforcement agencies to detect, investigate and prevent crime. Fraud prevention agencies can hold your personal information for different periods of time, which can be up to six years if they consider there to be a fraud or money laundering risk. If fraud is detected, you could be refused certain services, finance or employment.

How we store your information

We have put in place appropriate security features to try to prevent unauthorised access or use of your personal information. All information you provide to us is stored on secure servers and any payment transactions will be encrypted using SSL technology. We limit access to your data to only those employees, agents, contractors and other third parties who have a business requirement to access. They are only able to process your personal data on our instructions and they are subject to a duty of confidentiality.

Unfortunately, transmitting information via the internet can't be completely secure. Although we will do our best to protect your personal data, we can't guarantee the security of your data transmitted to the website; any transmission is at your own risk.

Your data will primarily be held in the UK but there may be occasions when the data that we collect from you is transferred to, and stored at, a destination outside the UK or the European Economic Area. This is most likely where our third party partners and service providers who help us provide you with products and services process data outside the UK or the European Economic Area. In these circumstances, we will take all steps that are reasonably necessary to ensure your data is treated securely and in accordance with this policy.

How long might we keep your personal information

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements.

How long we keep your personal information for will depend on the purpose for collecting and processing it.

Any personal information needed to provide you with our products and services will usually be held for the duration of your relationship with us and a period of up to seven years after that.

Sometimes, we might be unable to delete your personal data for technical reasons (for example, where this is stored in archives). In these circumstances, we will continue to securely store your data and only use it for purposes that we have communicated to you until this is deleted.

How we may use your information for direct marketing

We'll tell you if we intend to use your information for marketing purposes and we'll give you the opportunity to opt out if you want to (unless we need a consent to use your information for marketing purposes – if we do we'll seek one). If you receive marketing emails and don't want to in future, please use the unsubscribe link within the email and we'll remove you from future campaigns.

Cookies

Cookies are small text files placed on your computer, smartphone or other device and are commonly used on the internet. We use cookies and similar technologies to:

- collect information that will help us understand visitors' browsing habits on our website;
- compile statistical reports on website activity, e.g. number of visitors and the pages they visit;
- temporarily store any information which you may enter in tools, such as calculators; and
- in some cases, remember information about you when you visit our site. We may need to do this to provide some of our services.

We use cookies to enable us to perform our contract with you (e.g. if you are an Internet Banking customer) and for our legitimate interests (e.g. to help us improve our service). We'll also ask your consent for non-essential cookies. To find out more about all types of cookies and how to control and delete them, including clearing your browsing history, you can read our cookie policy.

Indirect Marketing - Remarketing

Third parties, including Facebook and Google, may use cookies, web beacons and other storage technologies to collect or receive information from our website and elsewhere on the internet, and use that information to provide measurement services and target ads. With Facebook remarketing you may see our ads on Facebook after you have visited our site. For this to happen, Facebook uses a Custom Audience Pixel that is activated when a visitor lands on a webpage and a unique "cookie" is placed in their browser. Facebook, lookalike audience targeting allows us to show ads on Facebook to people who are similar to those who have already visited or utilised our services.

Opting out

To opt out of Facebook's collection and use of information for ad targeting please visit Facebook and On the Facebook website, go to Settings > Ads > Advertisers and Businesses > Who have uploaded and shared a list with your info > View details > Privacy options > Permanent Opt Out.

To opt out of Google; open the Google settings app on your device (called Google Settings or Settings, depending on your device), Scroll down and tap Google, Tap Ads, Switch on Opt out of interest-based ads or Opt out of Ads Personalisation.

Your rights under the law

You can exercise your rights by contacting us. We may need more information from you before we can process your request. You will not normally need to pay a fee to exercise your rights but we reserve the right to charge a fee request is clearly unfounded, repetitive or excessive.

You have the following rights in relation to your personal information that we hold:

The right to access

You have a right to request that we provide you with a copy of the personal information on you that we hold. You also have the right to be informed about how we process your personal information, which is set out in this policy. You can ask us to confirm the safeguards under which your personal information is transferred outside of the UK or European Economic Area.

Before sending you a copy of the personal information you requested, we may ask you for additional information to confirm your identity and for security purposes.

The right to update or correct

You have a right to request that we update or correct any inaccurate personal information. We may seek to confirm the accuracy of this personal information before doing this.

The right to erasure

In certain circumstances, you can request that we delete your personal information. If you make a request for deletion, we will consider whether we can comply with your request or if there is a reason why we need to keep processing your personal information, which overrides your request.

The right to restrict processing

You can ask us to suspend processing your personal information if it is inaccurate or if our processing is unlawful.

The right to object to processing

You have the right to object to our use of your personal information which has legitimate interests as its legal basis if you consider that your fundamental rights and freedoms outweigh any legitimate interests. If we rely on consent to process your personal information, you can withdraw your consent at any time. This will not affect any processing carried out before you withdraw your consent and we may not be able to provide certain products or services to you.

The right to stop direct marketing

You have the right to ask us not to process your personal data for marketing purposes. You can choose the communications that we send you by using the communication preferences area of our website or by using the manage preferences links in our emails.

The right to portability

You have the right to ask us to provide you with an electronic file containing all of the personal information we hold about you.

Right to make a complaint

If you feel the need to complain about how we are processing your personal information, we ask that you contact us to resolve the matter using the details below. You do always have the right to complain to your local supervisory authority at any time.

Changes

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by email. Please note that updates to this policy are not emailed as a matter of course, so please check back frequently to see any updates or changes to our privacy policy.

Customer responsibility

It is your responsibility to ensure that your computer is virus protected. We accept no responsibility for any loss you may suffer as a result of accessing and downloading information from this site.

Contact

Please send any questions or comments about this policy to The Compliance Officer, Invinitive Financial UK Ltd, 52C Market St, Ashby de la Zouch, LE65 1AN, email us at compliance@invinitive.co.uk or by calling 0800 048 8485. Our Data Protection Officer can be contacted using the same contact details.