

FNZ Securities Limited Privacy Policy for Custody, ISA and SIPP Services

1 Who we are

- 1.1 This privacy policy will explain how FNZ Securities Limited (**we or us**), a company incorporated under the laws of England with registered no. 09486463 with its registered office at 10th Floor 135 Bishopsgate, London, United Kingdom, EC2M 3TP (**FNZ Securities**) collects and processes your personal information as a controller. This includes the provision of execution, settlement, custody and associated services (**Custody Services**) as well as Individual Savings Account (**ISA**) and self-invested personal pensions (**SIPP**) services to you (together the **Services**). The collection and processing of personal information are conducted in accordance with the Custody Terms and SIPP Terms (as applicable) that have been provided to you alongside this privacy policy. When we refer to your Investment Services Provider, we mean the service provider that you have authorised to arrange on your behalf for us to provide the Services to you.
- 1.2 FNZ Securities is authorised and regulated by the FCA. It appears on the UK's financial services register with firm reference 733400.
- 1.3 When providing you with the Services, we and the Investment Services Provider may share personal data about you between us in order for us to deliver the Services to you. In doing so we each act as separate controllers of your personal data and are each responsible for your data in this context.
- 1.4 FNZ Securities may process your personal data for the purposes set out in this privacy policy, and may also carry out other processing, for any additional purposes that may be separately notified by them to you. **Therefore, it is important that you read this privacy policy together with any other privacy policy or fair processing notice that we and/or the Investment Services Provider may provide you on specific occasions so that you are fully aware of how your data is being used in the context of the Services.** This privacy policy supplements other notices provided by us and/or the Investment Services Provider and privacy policies and is not intended to override them.

2 Our commitment to privacy

- 2.1 We are committed to ensuring that your privacy is protected when personal information about you is provided to us.
- 2.2 Please read this Privacy Policy carefully. It explains:
- The types of personal information which we hold and how it is obtained.
 - The purposes for which we hold personal information and the legal basis for processing.
 - How we use the personal information which we hold and who we share it with.
 - For how long we hold personal information.
 - Your rights in relation to your personal information.
 - The procedures we have in place to protect your privacy.

3 What personal information do we hold?

- 3.1 FNZ Securities holds the following personal information about you so that we can provide the Services:

- **Personal and contact information:** including your full name, address, email address, date of birth, and phone number);
- **Legal information:** national identifiers, copy documents relating to your identity, nationality and citizenship such as birth certificate, passport, proof of address documents, marriage certificates;
- **Financial Information:** information based on your cleared cash, securities relating to your account, any receiving dividends, interest payments and other entitlements accruing (excluding scrip dividends) on your account;
- **Tax Information:** your National Insurance no, residency, nationality and other Anti-Money Laundering, and Know Your Client information;
- **Transactional Information:** your transactional information (including your instructions), account details, and account authentication details;
- **Communication Information:** information we capture through your communications with the Investment Services Provider (or us should we need to contact you, however, please note that you may only communicate with us through the Investment Services Provider, e.g. telephone conversations, emails and instant messaging);

3.2 We may also generate and collect **Product Use Information**, which is information about how you use the Services, directly from your use of the Services.

3.3 We may also hold special category personal data about you. We only collect and use this information where you have given us explicit consent or where permitted by the law. Information in this category includes:

- *political opinions*
- *health information, information relating to sex life or sexual orientation; and*
- *Criminal convictions and offences (needed for lending decisions, fraud prevention, anti-money laundering and to meet legal obligations);*

3.4 All communications with us should be made through the Investment Services Provider. However, if we have cause to contact you or you contact us, we may record all telephone conversations relating to your account including, but not limited to, recordings of investment instructions for training, monitoring and fact verification purposes.

4 How do we collect your data?

4.1 Generally, we collect your personal information by:

- **Sign up to the Services:** when you agree to receive the Services via the Investment Services Provider (acting as your agent);
- **Providing copies of your documents:** we may request copies of documents to verify your age or identity. These documents may include your passport, driving licence, and proof of residential address.
- **Use of our Services:** when we deliver the Services to you and communicate with you (through the Investment Services Provider in respect of the Services).

- **From Third Parties:** we will also collect personal data from the Investment Services Provider and other third parties throughout the course of your relationship with us, from credit reference agencies (e.g. Experian) and fraud prevention agencies (e.g. CIFAS), from Payment card networks (e.g. MasterCard), from the Government and their agencies (e.g. HM Revenue & Customs), and from public records (e.g. the electoral roll).

5 How we share your personal data

5.1 We may share your personal data with:

- the Investment Services Provider to enable us to work together to deliver the Services to you;
- other members of the FNZ Group for administrative purposes. Details of the entities which make up the FNZ Group can be found [here](#);
- other companies, commercial partners, agents and professionals who provide products, services and administrative support to the FNZ Group (e.g. third party IT service providers and auditors);
- Anyone we may transfer our rights and duties under any arrangement to;
- Credit reference agencies (**CRAs**) and fraud prevention agencies;
- UK and overseas regulators, authorities and their service providers (e.g. the Financial Conduct Authority);
- UK and overseas tax authorities (e.g. HM Revenue & Customs);
- UK and overseas law enforcement agencies (e.g. the National Crime Agency); and
- Any other regulators or other parties if we are required to do so to meet our legal obligations.

5.2 The identities of the CRAs, their role as fraud prevention agencies, the data they hold, the ways in which they use and share information, data retention periods and your data protection rights with the CRAs are explained in more detail in the CRA Information Notice (**CRAIN**). You can find this on each of the CRA websites at:

- transunion.co.uk/crain
- equifax.co.uk/crain
- experian.co.uk/crain

5.3 We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6 Legal basis for processing

6.1 Where UK and/or European data protection laws apply, we rely on the following legal bases:

- **Legal obligation:** we are required by law to process your information including, verifying your identity, conducting fraud checks, and fulfilling any other requirements imposed by our regulators.
- **Performance of a Contract:** in order to provide you with the Services, we will require certain information including your account information and transaction data. This information will be used to deliver the Services to you and to provide you with account statements and reports, which will be sent to you via the Investment Services Provider.
- **Consent:** in some cases we may seek your consent to use your information for a specific purpose, or where the law requires consent to be obtained. If we rely solely on your consent to process your information, you have the right to change or withdraw your consent at any time.
- **Legitimate interest:** we may use your information based on our legitimate interests, provided that the benefits of doing so outweigh any potential impact on your interests or legal rights. Our legitimate interests include providing you with services as per our agreement, data analysis (which may involve developing statistics, with your personal data anonymised prior to this).

7 How will we use your data?

- 7.1 FNZ Securities collects and processes your data so that we can provide you with the Services in accordance with our contract with you for such services, including:

Purpose of processing	Legal Basis
To check your identity and eligibility for an account	<i>Performance of a Contract; Legal obligation</i>
To manage your account	<i>Performance of a Contract; Legal obligation</i>
To transfer cash or investments from your account to meet your settlement and other obligations to us	<i>Performance of a Contract; Legal obligation</i>
To administer any joint accounts	<i>Performance of a Contract; Legal obligation</i>
To accept your instructions through the Investment Services Provider and issue you with any reports requested by you via the Investment Services Provider	<i>Performance of a Contract; Legal obligation</i>
To administer the payment of any benefits to you under your SIPP	<i>Performance of a Contract; Legal obligation</i>
To settle your account through commercial settlement systems	<i>Performance of a Contract; Legal obligation</i>
To close your account if it becomes dormant or on termination of our agreement	<i>Performance of a Contract; Legal obligation</i>
To deal with any unclaimed investments on your account	<i>Performance of a Contract; Legal obligation</i>
To provide you with reports and statements relating to your account	<i>Performance of a Contract; Legal obligation</i>
Assess risk and carry out credit scoring	<i>Performance of a Contract; Legal obligation; Legitimate interests</i>

8 What procedures do we use to protect your privacy?

- 8.1 We undertake to process the personal information which we collect in accordance with the applicable laws on data protection.
- 8.2 We have strict security procedures covering the storage and disclosure of your information (although we do not warrant that this is the case) in order to prevent unauthorised access. This means that we may ask for proof of identity before disclosing personal information to you.
- 8.3 We will take all reasonable technical and organisational security measures to prevent the unauthorised or unlawful processing of your personal data and accidental loss or destruction of, or damage to, such data.
- 8.4 We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

9 For how long do we hold your personal information?

- 9.1 We will not hold on to any personal information collected for the purposes described above for longer than is reasonably necessary to fulfil the purposes we collected it for, and to ensure we are able to comply with any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you. For further information on our retention periods please contact GroupDPO@fnz.com.

- 9.2 In order to satisfy regulatory requirements, we will retain information after your account has been closed. This will include applications that do not proceed.
- 9.3 To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Once the retention period expires, personal information is deleted. Therefore, the right to access, the right to erasure, the right to rectification, and the right to data portability cannot be enforced after the expiration of the retention period.

10 Transfers of personal data to countries outside the UK and/or European Economic Area (EEA) for the purposes of European and/or UK data protection laws

- 10.1 Due to the international nature of FNZ Securities business, we will sometimes send personal data to another member of the FNZ Group. If European and/or UK data protection laws apply to your personal data, this will mean that personal data may be processed outside the UK or EEA by another FNZ Group entity. We may pass personal data to other FNZ Group companies in accordance with the purposes outlined above. To protect your personal data when it is shared with FNZ Group entities outside the UK or EEA, we ensure that the recipient entities are bound by UK or EU approved standard contractual clauses, unless the recipient is in a country where the data protection regime is deemed equivalent to GDPR by UK Government.
- 10.2 Where required by UK and/or European data protection laws, when we transfer personal data outside the UK or EEA, we will ensure that there are adequate safeguards in place to protect your personal data. Generally, these safeguards will take the form of UK or EU approved standard contractual clauses, unless the third party has 'binding corporate rules' in place within the third parties organisation.

11 You rights in relation to your personal information

- 11.1 To the extent that UK and/or European data protection laws apply, you will have the following rights in relation to the information about you which we process as described in this privacy notice:
- **The right to access:** You have the right to request copies of your personal data. You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.
 - **The right to rectification:** You have the right to request that we correct any information you believe is inaccurate. You also have the right to request to complete information you believe is incomplete.
 - **The right to erasure:** You have the right to request that we erase your personal data, under certain conditions. However, most of the data held by us would be covered under regulatory requirements for retention.

- **The right to restrict processing:** You have the right to request we restrict the processing of your personal data, under certain conditions, but that may result in us not being able to service your account.
- **The right to object to processing:** You have the right to object to processing of your personal data, under certain conditions, but that will result in suspension of your account.
- **The right to data portability:** You have the right to request that FNZ Securities transfers the data that we have collected to another organisation, or directly to you, under certain conditions.
- **The right to complain:** You have the right to complain about an infringement of data protection law and the exercise of data rights, such as how we process your personal data or deal with a subject access request.

12 Contact us

- 12.1 We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal right, please contact our Data Protection Officer at GroupDPO@fnz.com and include the country you are based in and the FNZ business that you have previously contacted or dealt with within your message.
- 12.2 If you make an access request, we have one month to respond to you. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

13 How to make a complaint

Should you wish to make a data protection complaint you should contact GroupDPO@fnz.com. We shall acknowledge your complaint within 30 days. We shall keep you updated on the progress of your complaint and explain the outcome. If you feel that we have not addressed your concern in a satisfactory manner, you have the right to complain to the Information Commissioner. <https://ico.org.uk/global/contact-us/>

14 Further Important Points

- 14.1 We keep our privacy policy under regular review. If we change our privacy policy while this website remains active, we will post the new privacy policy on this website. This version was last updated on 20th May 2024.
- 14.2 It is important that the personal data we hold about you is accurate and current. Please keep your Investment Service Provider informed if any personal data you have given to us as part of the services changes during your relationship with us.
- 14.3 You can also contact us by filling in the form [here](#).