

Information we collect about you

The information we collect about you may include;

- contact information (e.g. email address and telephone numbers)
- your personal details (e.g. details about you and your family and dependants)
- Your employment details (e.g. where you work and your employment details)
- financial information (e.g. your bank account and income details)
- policy and plan details (e.g. your pension, life assurance, protection insurance and investment details)
- information about your physical and mental health.

This information may come from:

- You, when you investigate our services, use our services or use our platforms of choice; e.g. Transact or Seven Investment Management
- The way you use your account, assigned platform or our services
- Your digital devices
- Your interactions with us, including information you may voluntarily share with us
- Credit reference agencies (who may check the information against other databases – public and private – to which they have access) or fraud prevention agencies

Using your information

The UK's data protection law allows us to use your personal information provided we have a legal basis for doing so. The legal basis that we rely on to use your information include:

- You've given us your consent
- We need to use your information to perform our obligations under our agreement with you
- We need to use your information so we can comply with a law we're subject to
- We (or a third party) have a legitimate interest in using your information which isn't out weighted by your interests or fundamental rights and freedoms

We've set out in the table below how we use your information and the legal basis for using it.

How we may use your information	Legal basis
<ul style="list-style-type: none"> • Verify your identity and any other information you've provided us • Prevent or detect fraud, money laundering or other crime • Manage your account(s), policy(ies) and investment(s) with us • Prepare anonymised statistical reports from information about you and other customers to help us manage our business better, for example improving our risk models • improve the relevance of marketing messages we may send you • Analyse, assess and improve our services to customers, and for training and monitoring purposes • To establish, exercise or defend legal claims • Sending you servicing and marketing messages 	<p>Legitimate interest –</p> <ul style="list-style-type: none"> • Developing and providing new products and services our customers will find useful • Protecting our customers from unnecessary risks • Preventing fraud and money laundering to protect our business • Ensuring we are able to offer you financial advice in accordance with all prevailing legal and regulatory obligations • Protecting us and our other customers against harm to our collective rights and interests
<ul style="list-style-type: none"> • Verify your identity and any other information you've provided us • Prevent or detect fraud, money laundering or other crime • Regulatory reporting 	<p>To comply with a legal obligation, e.g. –</p> <ul style="list-style-type: none"> • UK/EU anti-money laundering laws and regulations • UK/EU/UN sanctions (which prohibit us from providing products to certain individuals) • Rules and regulations imposed by the Financial Conduct Authority and HMRC
<ul style="list-style-type: none"> • Verify your identity and any other information you've provided us • Prevent or detect fraud, money laundering or other crime • Manage your account with us 	<p>To satisfy our obligations under our agreement with you e.g. –</p> <ul style="list-style-type: none"> • To respond to your queries • To allow you to use our lending platform • To allow us to provide any services including any financing you may have requested
<ul style="list-style-type: none"> • Send you marketing messages on behalf of third parties • Refer you to other providers or advisers if we're unable to assist you • Hold any information relating to your physical and mental health you've given us to assist us advise you 	<p>Your consent</p>

3. Sharing your information

We may share your information with the following third parties so that we can use your information for the purposes described above.

- Credit reference and fraud prevention agencies
- Our regulators or government authorities, for example the Financial Conduct Authority, the Financial Ombudsman Service and the police

- Collection agencies and lawyers to help us collect any money you owe us
- Our suppliers, sub-contractors and third-party data processors

Your personal details are private and we won't disclose customer information to other parties unless absolutely necessary to deliver the service we have been contracted to deliver to you depends upon it. We will not be responsible for misuse of transactional data by others, but you must inform us promptly if you are the victim of any misuse of that information in order that we may assist you in addressing the situation.

6. Overseas data transfers

We don't currently knowingly transfer your data outside the European Economic Area (EEA). Whenever fraud prevention and credit reference agencies transfer your information outside the EEA, they impose contractual obligations on the recipients of that data to protect your personal information to the standard required in the EEA. They may also require recipients to subscribe to 'international frameworks' intended to enable secure data sharing.

7. Retaining your information

We'll keep your information for up to six years after you close your Investment Quorum account, to prevent fraud and other financial crimes, to comply with our regulatory obligations and to establish, exercise or defend legal claims.

In exceptional circumstances, e.g. if there is an ongoing regulatory investigation or legal claim, we may retain our information beyond the six-year period.

We must comply with the Financial Conduct Authority as well as the Information Commissioner's Office but as a regulated business the FCA will take priority when the rules are deemed to be in conflict.

8. Your rights

Right to be provided with certain information

We must provide you with certain information at the time we collect your personal information, including how we use it and the legal basis for doing so, who we share it with, how long we intend to keep it, where we got the information from and your rights in relation to it. You find this information in this Privacy Policy.

Right to access your information

We must provide you with a copy of your information unless providing some or all of it would adversely affect the rights and freedoms of others, or the law allows us not to comply with your request. You can access your personal information by emailing us at info@investmentquorum.com or by calling us on **020 7337 1390**. We aim to provide you with your information within 30 days.

Right to correction

You can ask us to correct any information which you believe is inaccurate. We'll update your information as soon as we can. You may need to provide supporting evidence before we can deal with your request; e.g. a copy of your marriage certificate if you want to update your name.

Right to erasure ('right to be forgotten')

You can ask us to erase your personal information:

- if you think it's no longer necessary for us to hold your information;
- if you don't think we have any legitimate grounds for processing it;
- if you think we're using your personal information unlawfully; or
- if you think we should delete your personal information because the law requires us to do so.

Right to restrict processing

You can ask us to stop using your personal information:

- if you think it's inaccurate;
- if you think it's illegal for us to use it;
- if you don't want us to destroy it because you need it for legal proceedings;
- if you've told we don't have a legitimate reason for using it and we're considering your request.

Notification obligation

You can ask us to notify everyone to whom we've given your personal information whenever we amend, delete or agree to restrict our use of it.

Right to data portability

If we're using your information on the basis of your consent or because we need it to carry out our contractual obligations to you, you can ask us to give you your personal information in a structured, commonly used and machine-readable format or have it transmitted to another data controller.

Right to object

We may use your personal information to further our legitimate interests; e.g., we may use information about you to improve our marketing messages because we have a legitimate interest in making sure our customers know about new products which could be of benefit to them. We'll always give you a right to object whenever we intend to use your personal information for our legitimate interests.

There may be occasions when you wish to exercise one of your rights and we're unable to agree to your request, e.g. because we have compelling legitimate grounds for using your information, or because we need to keep your information to comply with a legal obligation.

How to stop receiving marketing messages

If you no longer want to receive marketing messages you can log into your account and change your settings. If you need help with this, please get in touch with our customer services at info@investmentquorum.com

9. Making a complaint about the way we have handled your data

If you're unhappy with how we've handled your information you can refer your concerns to the Information Commissioner's Office, the body that regulates the handling of personal information in the UK, at:

Information Commissioner's Office

Wycliffe House,
Water Lane,
Wimslow,
SK9 5AF
Tel: [0303 123 1113](tel:03031231113)
Website: www.ico.org.uk

10. Consequences of not providing us with your personal information

You don't have to provide us with your personal information. However, we need your information partly because the law requires us to ask for certain details about you and partly so that we can offer products and services to you in accordance with our agreement with you. This means that if you don't provide us with the information we ask for, we'll not be able to open an account for you.

11. Keeping your information safe

We take your privacy seriously and take every reasonable measure to keep your information secure. We monitor our systems 24/7 and continually work to improve the security of your personal information and our systems.

While we use all reasonable efforts to safeguard your personal information, you should be aware that the use of the internet is not entirely secure and we can't guarantee the security or integrity of any personal information that is transferred from you or to you via the internet.

12. Cookies

We use "cookies", which store small amounts of information on your computer or device to allow certain information from your web browser to be collected. You can find more details about this in our **Privacy Policy**. You can clear and disable cookies within your own browser.

13. About Investment Quorum Limited

Investment Quorum Limited is a company incorporated in England & Wales under company registration number 4064060, having its registered office at 85 Gresham Street, London EC2V 7NQ. We are registered with the Information Commissioner with registration number Z879078. It's also authorised and regulated by the Financial Conduct Authority and entered on the Financial Services Register under firm registration number 232088.

14. Changes to this Privacy Policy

We'll regularly review this Privacy Policy. If we make any changes, we'll post the updated policy on this page.

This Privacy Policy was last updated on **18 May 2018**. The changes are related to how we handle your data and what we can and can't do with it.