

EQi App – Privacy Notice



We understand how important your personal data is and are committed to protecting and respecting your privacy.

'**Personal Data**' means any information relating to or which identifies you. This can include items such as your name, address, phone number, identification numbers (such as an account number), location data or online identifiers.

This Privacy Notice seeks to explain:

1. Who we are;
2. Products and services covered by this Privacy Notice;
3. How we collect your personal data;
4. Why we collect your personal data;
5. How long we hold the personal data ;
6. The conditions under which we can share it with others;
7. Overseas processing;
8. How we keep your personal data secure;
9. Your personal data rights and how to exercise them;
10. Useful information; and
11. Any further questions.

1 Who we are

Equiniti Financial Services Limited (EFSL) is one company within the Equiniti Group, and is authorised and regulated by the Financial Conduct Authority. Our main business is investment and general insurance services. Our registered address is **Aspect House, Spencer Road, Lancing, West Sussex, BN99 6DA** and our ICO registration number is: Z1028420.

EFSL is a '**Data Controller**'. This means that we are responsible for deciding how and why we hold and use personal data about you.

In this Privacy Notice, '**we**', '**us**' and '**our**' will always mean EFSL, as Data Controller. EQi is a trading name of EFSL.

If you have questions about your EQi app, please contact us on **0345 0700 720**.

2 Products and services covered by this Privacy Notice

This notice applies to the EQi app only. For further details about your EQi accounts, please see our full EFSL privacy notice at privacy.equiniti.com.

3 How we collect your personal data

- Information you provide to us through using this app;
- Information we collect about when and how you used our app, including information about your device and IP address which will include the capture of your location information.
- Information we receive from third parties such as network providers.

Keeping your personal data up to date

It is important to us that the personal data we hold about you remains accurate and up to date at all times, please let us know as soon as anything needs updating or correcting.



4 Why we collect your personal data

Under Data Protection legislation we must always have a legal reason for processing your personal data.

As part of the contractual obligations between us and you when you download the app, we:

- link to your underlying customer records, including the administration and management of your instructions;
- notify you about changes to our service and send you service messages relating to your account;
- keep our app secure and permitting you safe access to our services.

We also need to ensure with comply with legal obligations and ensure the proper administration of our business, such as enabling and monitoring your use of our app.

We are also always looking to improve our app and ensure that the content of this app is presented in the most effective manner for you and for your device. To do this we undertake troubleshooting, data analysis for research, statistical and survey purpose and assess how you interact with our app. We do this because of our legal and regulatory obligations in offering our services to you, as part of contractual obligations between us and you, as well as ensuring the proper administration of our business.

5 How long we hold your personal data

Your account number and date of birth are held on your mobile device for as long as the app is installed.

Information relating to your use of our app is retained in line with retention policies that are subject to regular review and assessment.

6 The conditions under which we can share your personal data with others

The information we hold about you is confidential and we will only share your personal information to enable us to deliver the app service, examples are as follows:

- At your request;
- Other Equiniti Group entities who help us deliver this services;
- Non Equiniti entities, such as our agents in connection with running this app for you, including service suppliers and professional advisors.

We will only transfer your personal information to trusted third parties who provide sufficient security guarantees and who demonstrate a commitment to compliance with applicable law and this policy.

We will share your personal data when required with other third parties such as Regulators and supervisory authorities; police and law enforcement agencies.

7 Overseas Processing

Information collected relating to your use of the app is securely held in the EEA.

8 How we keep your personal data secure

We understand how important your personal data is to you and we take appropriate steps to ensure that it remains secure.

We use secure ways of communicating with you when providing your account information.

You must immediately inform us if you become aware, or suspect, that someone else has knowledge of your account details.

If you have any concerns about the security of your mobile devices, we suggest you read the advice of Get Safe Online, which can be accessed at www.getsafeonline.org.



9 Your personal data rights and how to exercise them

You have rights in respect of the personal data that we hold about you. A summary of your rights is provided below. Some of these rights are conditional and depend upon why we are processing your personal data.

- The right to be informed about how we use your personal data.
- The right of access to a copy of any personal data EFSL processes about you, together with certain additional information. Your initial request will be free of charge, subsequent requests may attract an administration fee.
- The right to request us to rectify or update your personal data such as when you change your email address.
- The right to request us to erase your personal data in certain situations.
- The right to request us to restrict processing such as when you disagree over the accuracy of the personal data.
- The right to request a copy of your information for data portability purposes.
- The right to object to us processing your personal data for example when you want us to stop any marketing to you.
- Rights related to decisions based solely on automated processing, again in specific circumstances.
- Finally you always have the right to lodge a complaint with the Information Commissioner's Office (ICO) who regulates compliance with Data Protection legislation.

10 Useful information

Changes to this policy – We review our use of your personal data regularly. In doing so, we can change what personal data we collect, how we keep it and what we do with it. As a result, we can change this Privacy Notice from time to time to keep it relevant and up to date.

We will endeavour to alert you to these changes so that you can check you are happy with it before proceeding any further. Please look out for notices from us alerting you to these changes and take a moment to ensure that you're happy with any changes.

This policy was updated in January 2020. If you require copies of previous versions of the EQi app Privacy Notices, please contact the Data Protection Officer using the contact details noted below.

11 Any further questions about this Privacy Notice

We hope that this Privacy Notice has been helpful in setting out how we handle your personal data and your rights to control it.

If you have any questions that remain unanswered, please visit our Customer Privacy Centre online at privacy.equiniti.com where you will find our full EFSL Privacy Notice as well as general information about your rights and how Equiniti safeguards your data; or contact our Data Protection Officer:

- **By email** DPO@equiniti.com,
- **By post** Data Protection Officer, Equiniti, Highdown House, Yeoman Way, Worthing, BN99 3HH, or
- **By telephone** UK: 0333 207 5962 International: +44 121 415 0196

Lines are open 8.30am to 5.30pm (UK time), Monday to Friday (excluding public holidays in England and Wales).

Date Issued: January 2020