



Privacy Notice

For Third Parties

International Personal Finance plc and IPF International Limited, Group of companies (IPF Group) is committed to the highest standards of ethical business conduct. We strive to achieve our business goals, whilst ensuring we do that in a responsible and lawful way. This Privacy Notice describes the way we process your personal data, and also provides you with the information on your rights as a data subject as stated in the General Data Protection Regulation (GDPR) and any applicable national laws, including the UK GDPR*.

International Personal Finance (IPF) plc and IPF International Limited, of Number Three Leeds City Office Park, Meadow Lane, Leeds LS11 5BD is a data controller. This means we are responsible for deciding how we hold and use personal information about you. IPF will process your personal data in connection with carrying out its business activities and managing its operations, typically;

- in relationship with our contract management and performance,
- other internal management operations (such as website maintenance or development)
- addressing requests and enquiries of other stakeholders, such as regulatory authorities in accordance with the General Data Protection Regulation (GDPR), or,
- internal rules and policies as well as any applicable national laws.

This Privacy Notice describes also how and why we process your personal data obtained from you or from third parties, or collected when you visit our website www.ipfin.co.uk.

Your personal data might also be processed or controlled by other subsidiaries of the IPF Group, including but not limited to, Provident Polska S. A., Provident Financial Romania I.F.N. S.A., Provident Financial s.r.o., Provident Pénzügyi Zrt. and Provident Financial, s.r.o.

Where your personal data is controlled by the primary controller identified above as well as another controller from the IPF Group, the primary controller remains responsible for compliance with the data protection laws applicable to your personal data. In all cases, your contact point is the Data Protection Officer identified in this Privacy Notice. Irrespective of these arrangements, you may choose to exercise your rights towards any of the controllers from the IPF Group.

* Regulation (EU) 2016/679 of the European Parliament and of the Council of 27th April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation) as it forms part of the law of England and Wales, Scotland and Northern Ireland by virtue of section 3 of the European Union (Withdrawal) Act 2018) and as amended by the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019.

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1 Data Protection Principles

We will comply with the data protection principles, which are that personal data will be:

1. Processed lawfully, fairly and transparently;
2. Collected only for a valid purpose which we have clearly explained to you and not used in any way which is incompatible with that purpose;
3. Relevant to the purpose we have told you about and limited only to those purposes;
4. Accurate and kept up to date;
5. Kept for no longer than is necessary for the purpose we have told you about;
6. Kept securely

This Privacy Notice provides you with transparent information about the personal data that we collect and how we use it, your rights as a data subject and about the way you can exercise your data subject rights.

2 Identity and contact details of the Data Protection Officer

We, International Personal Finance plc, of Number Three Leeds City Office Park, Meadow Lane, Leeds LS11 5BD, work as your personal data controller.

We have appointed a data protection officer (DPO) who can be contacted with any privacy related issues.

e-mail: gdpo@ipfin.co.uk
or by post at the company address.

All matters will be treated confidentially however you may choose to contact the DPO anonymously.

3 Personal data

Personal information means any information which identifies you or could be used to identify you. We make sure that we only process your personal data strictly needed for a given purpose.

When you visit our website, we will not collect any personal information about you in connection with using our webpages except where it is specifically and knowingly provided by you, e.g.

- if you register for updates,
- or as a media centre user,
- or if you email us to provide feedback on the website
- or to submit any sort of a query using the dedicated interface.

Further details on the use of cookies as a specific tool that may be used for collection of information about you, including personal data, are available in our [Cookie Policy](#) here. When personal information is collected, it may be used by us to corroborate your identity, to process and fulfil requests for information or help us to develop the website to make it more useful to you.

We might process the following categories of your personal data depending on the purpose followed:

Identification data – name, surname, address, national insurance number, etc.

Contact data – email, telephone number, address, etc.

Data about professional life – employer, experience, position, salary, education, any other pay-related information, etc.

Data about family members - name of your spouse, children, etc.

Digital data – cookies, IP address, websites and social network activities and other data publicly available on the Internet etc.

4 How do we collect your data?

Directly from you:

- When communicating or interacting with you by phone, e-mail or other communication channels; When visiting our website;
- As part of our original employment relationship.

From other sources:

- When signing a contract with our business partner and your data are provided to us as contact details.

5 How long do we keep your data?

When we process your data for the purpose of negotiating, concluding and the performance of a contract to which you/your company is a party, we will process your personal data for the contract duration and 6 months after the contract termination.

- For the purpose of the fulfilment of the legal obligation, we process your data required by the relevant laws and regulations for a period provided by the relevant law.
- We may also keep your data to respond to any questions or complaints.
- We can also process your data for other purposes. In such case the retention period will be defined specifically for a given purpose below.

6 How do we protect your data?

In order to make sure that your rights and freedoms are not put at risk and that compliance with relevant laws and regulations in the field of data protection is observed, we have implemented appropriate technical and organisational measures to ensure a sufficient level of security to the personal data processing.

These measures consist of regular training and testing of our employees and partners, introduction of relevant policies and processes which are regularly reviewed and updated under the supervision of our Data Protection Officer. We also make sure we carefully assess our suppliers to ensure they adhere to GDPR and other relevant legal requirements.

7 To whom do we disclose your data?

Depending on the purpose of processing, we may disclose your personal data to different categories of recipients, namely:

- Your personal data might be processed or controlled by other subsidiaries of the IPF Group
- Our partners, shareholders and investors
- Nominees, trustees, registrars, brokers and administrators in the course of operating employee share schemes
- Our other external suppliers
- We are also in some cases legally obligated to disclose data to public authorities (e.g. investigative authorities, tax administrators, the Financial Services Authority), but only to comply with a defined legal obligation.
- We only disclose your data to the extent necessary and in a form that is required to achieve a given purpose.

In order to conduct our business we have to process your personal data in accordance with the conditions presented in this Notice. We may use external suppliers in the processing of data to either optimise our internal processes and/or conduct some of the processing on our behalf (typically to provide support and maintenance services) or we may transfer data between IPF group companies. We process your personal data within the European Economic Area, and also in other countries (to access the list of places of data processing click [here](#)).

In this respect, we carefully assess the relevant circumstances and make sure appropriate safeguards are put in place so that your rights are not undermined. All of our suppliers who process your data in a third country and are not a recipient of an adequacy decision under the applicable data protection laws are required to sign our model contractual clauses* and we regularly check the level of security provided to personal data processed on our behalf. We ensure that conditions to enforce your rights and effective legal remedies are available. Any potential external supplier is subject to an internally conducted security pre-assessment, mutual rights and obligations are carefully addressed in the Data Processing Agreement.

How do we process your data?

8 We process your personal data by collecting, storing and organising it in our systems. We will compare and alter data to ensure it is accurate and kept up to date. When appropriate your data is destroyed/deleted. Within the course of our business activities as a multinational company we transfer your personal data within the IPF Group in accordance with the legal data transfer requirements.

How do we use your data and on what legal basis?

Below we describe the legal basis for processing of your data and different purposes of processing:

9 The performance of a contract

We use your personal data for concluding and the performance of a contract to which you/your company is a party managing the agreement or in order to take steps prior to entering into the contract.

For the purpose of negotiating, concluding and the performance of a contract to which your company is a party we process only necessary information about you, namely your identification data, contact data and data about professional life.

To comply with our legal obligations

We have audit, tax reporting and accounting obligations. To comply with the legal obligation, we may disclose your data to our financial consultants, auditors and other service providers, provided always that they ensure the confidentiality of your personal data.

For such purpose we process only necessary information about you, namely your identification data, contact data, data about family members and data about professional life.

Based on our legitimate interests

We may transmit your personal data within our group organisation, e.g. for internal administrative purposes, in accordance with legal data transfer requirements.

We may process your personal data for our legitimate interest in conducting our business and our investors and shareholders relationship management consisting mainly in the following:

- To operate share plans which are in the best interest of the IPF Group
- To allow wealth sharing in the best interest of IPF Group
- To align our interest with the best interests of our shareholders
- To more efficiently administer our share plans.

To make sure our interests are balanced against your interests, we conduct a legitimate interest balancing test for each processing activity we undertake.

* Commission Decision 2004/915/EC, dated 27 December 2004 – in which the Commission approved an alternative set of model clauses for transfers from data controllers in the EEA to data controllers outside the EEA. Commission Decision 2010/87/EU, dated 5th February 2010 – in which the Commission approved a new set of model clauses for transfers from data controllers in the EEA to data processors outside the EEA to replace the Set I controller to processor clauses.

Based on our legitimate interest we might process your identification data, contact data, data about professional life, data about family members and digital data. When we process your data based on our legitimate interest, we keep your data no longer than is necessary to reach the purpose. If your data is no longer required for the lawful purposes for which it was obtained, it will be destroyed subject to any contrasting laws or data protection considerations (for your information, some of the factors which will affect how long we retain your data include your continued participation in share plans operated within the IPF Group).

We may also collect and process your data based on your consent

Your consent is voluntary and represents a specific, informed and unambiguous indication of your wish and can be withdrawn at any time. If we require consent, then at the relevant time we will provide you with all of the information necessary to carefully consider whether you wish to consent. Please note that the withdrawal of your consent will not affect the lawfulness of processing taking place before such withdrawal.

If you are located outside of the EEA:

- the processing of your data may be governed by local national and/or other international laws, as well as the GDPR; and
- by participating in an IPF share plan, you are deemed to consent to the processing of your personal data, in accordance with this Privacy Notice.

10 Your rights

You have numerous rights under the existing legislation. These are not absolute rights and there are exceptions. However:

- You have a **right to be informed about the data we collect and how we use your data.**
- You have the right **to access** your personal data, including the right to obtain a copy of your personal data we process.
- You have a **right to portability** of your data which you have provided to us or data we process based on your consent or where the legal basis is the performance of a contract and which is processed by automated means. We will provide that data to you in a secure Excel file, which is machine-readable, so you can store it or disclose it to other service providers. You may also provide your data obtained from other companies to us. You may also request we provide your personal data to another controller – however, we can only do that when the transmission is technically possible. As the Excel file contains your personal data, please store the personal data securely on your device.
- We **keep your personal data up to date**, by asking you to review it from time-to-time and when required by law. However, if you find any data we have about you is incorrect, you can request rectification of inaccurate data and you can have incomplete data completed or additional data provided via contacts defined above. You can ask for restriction of your data processing if the accuracy of your personal data is contested for a period allowing us to verify the accuracy.
- You have a **right to restrict processing.** That means we will store your data, but not use it for anything else. You also have a right to request erasure of your personal data. You can exercise both rights on conditions specified by law. If you have obtained restriction of processing, you will be informed before the restriction of processing is lifted.
- You have a **right to contact us** at any time, if you believe your rights under data protection law have been violated.

11 Automated decision making

We do not make any automated decisions about you.

12 Keeping your information up to date

It is important that the personal information we hold about you is accurate and up to date. Please keep us informed if your personal information changes.

13 Your right to object to your data processing based on legitimate interest

Wherever we rely on our legitimate interest to use your personal data, we have taken into account and acknowledged your interests and rights under data protection law. Your privacy rights are always protected by sufficient safeguards and balanced with your rights and freedoms. You have the right to object to your personal data processing based on our legitimate interest.

If you wish to submit an objection against your personal data processing based on our legitimate interest or to exercise any of the rights referred to above click [here](#) or contact the DPO (details provided at the beginning of this Notice). Please note that we can continue processing if we find our legitimate interest is balanced with your rights and freedoms. If your objection is sustained, it may stop us from processing your personal data for a given purpose.

14 Your right to turn to the Data Protection Authority or a competent court

You have a right to turn to the competent supervisory Data Protection Authority - in the UK this is the Information Commissioner's Office, via helpline on 0303 123 1113 or electronically, via live chat <https://ico.org.uk/global/contact-us/live-chat/live-chat-individuals/> or via email <https://ico.org.uk/global/contact-us/email/> or in writing to the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or a competent court or tribunal if you believe your rights with regards to the personal data processing have been violated. In the European Economic Area you should contact your local data protection regulator.

15 Updates

We keep our privacy notice under review and may change it from time to time (mostly to comply with the law and data protection practices). Updated versions will be shared with you via email and also published on our webpage. This notice was last updated in January 2021.



International Personal Finance plc.

Registered address: Number Three, Leeds City Office Park,
Meadow Lane, Leeds, LS11 5BD. Registered in England and Wales. Company
Number 6018973