

Privacy policy

AJ Bell Investcentre is dedicated to safeguarding and respecting your privacy and takes the security of your personal information very seriously.

It's important that you read this policy carefully, so you are aware of how and why we are using your data.

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1. About us

This privacy policy is provided on behalf of the AJ Bell group, which is made up of AJ Bell plc and its subsidiaries. Any references in this policy to “AJ Bell”, “we”, “us” or “our” refer to the relevant AJ Bell group company which acts as controller of your personal information. We have listed the AJ Bell group companies that most frequently act as controller.

Name	Company registration number
AJ Bell plc	04503206
AJ Bell Management Limited	03948391
AJ Bell Securities Limited	02723420
AJ Bell Asset Management Limited	09742568
AJ Bell Business Solutions Limited	03091664
AJ Bell Media Limited	03733852

The registered office for all AJ Bell group companies is AJ Bell, 4 Exchange Quay, Salford Quays, Manchester, M5 3EE.

AJ Bell Business Solutions Limited (company number 03091664) is the controller and responsible for this website.

2. How we collect your information

You may give us personal information when you register to use AJ Bell Investcentre, apply for our products or services, use our website and apps or by corresponding with us by phone, email, social media or otherwise. This includes information you provide when you enter a competition or promotion, take part in a survey, or when you interact with us in any other way.

You may also give us information when you attend one of our events, apply for a job vacancy, are employed by AJ Bell, or visit our premises.

We may receive personal information about you from the following sources:

- anyone acting on your behalf, including your adviser;
- service providers and business partners who help us to deliver our products and services;
- third parties that help us monitor or improve our products and services; and
- publicly available information.

If you are an adviser providing personal information on behalf of your client, you confirm that you have their authority to do so and that they understand how we will use their personal details.

We may also automatically collect technical data about the device used to access our website or apps, your browsing actions and patterns.

If we do not receive personal information that we have requested from you, we will not be able to provide our services to you.

3. What information we collect about you

We collect different types of personal information about you, including but not limited to:

- 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; and
- 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.

4. How we use your information

We use your personal information for some or all of the following purposes:

- 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;
- verifying 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;
- tailoring and customising our services, communications and marketing for you;
- improving the performance of our online campaigns and for retargeting activities;
- enhancing your user experience and monitoring site performance;
- administering 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.

5. Our 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 AJ Bell Investcentre 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; and
- 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; and
- 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.

6. Who we share your personal information with

We use third parties to help us provide our products and services which may require the sharing of your personal information.

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

- anyone authorised to act on your behalf;
- any member of the AJ Bell group, which is made up of AJ Bell plc 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; and
- 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; and
- 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.

7. Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to improve your experience when you browse our website.

You can disable or refuse all or some browser cookies but, if you do, some parts of our website may not function properly or become inaccessible.

For detailed information on the cookies we use and the purposes for which we use them, see our cookie policy.

8. How we store and transfer your personal 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 do so. 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.

9. How long 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.

10. Third-party links

Our website, apps and emails may contain links to and from other websites, including those of our advertisers and affiliates. If you follow a link from or to any of these websites, please note that they have their own privacy policies and we don't accept any responsibility or liability for your data if you choose to use these websites. Please check these policies before you submit any personal data to these websites.

11. Your rights

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 if your 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 the personal information we hold about you.

The 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.

12. 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.

13. Contact

Please send any questions or comments about this policy to The Marketing Department, AJ Bell, 4 Exchange Quay, Salford Quays, Manchester M5 3EE, email us at enquiry@investcentre.co.uk or call 0345 83 99 060. Our Data Protection Officer can be contacted using the same contact details.