

FE fundinfo Privacy Policy

FE fundinfo is committed to protecting your personal data. This privacy policy (“Privacy Policy”) sets out how we look after your personal data when you visit our website or use our products and services and tells you about your privacy rights and how the law protects you.

Who we are

FE fundinfo is a group of companies that includes multiple products and services and websites, including: fefundinfo.com, financialexpress.net, publifund.com, fundinfo.com, etfinfo.com, cashcalc.co.uk, fundconnect.com, zenithpartners.com.au, trustnet.com, investegate.co.uk, moneymanagement.com.au, yoursri.com.

Who the data controller is

FE fundinfo (UK) Limited is the controller and responsible for your personal data. The FE fundinfo Group is made up of different legal entities, details of which can be found here: [Click here](#).

This privacy policy is issued on behalf of FE fundinfo (UK) Limited and the FE fundinfo Group, so when we mention “Company”, “we”, “us” or “our” in this privacy policy, we are referring to the relevant Company in the FE Fundinfo Group responsible for processing your data.

If you have any questions about this privacy policy or our privacy practices, please contact us as follows:

- Postal address: FE fundinfo (UK) Limited 30 Great Pulteney Street, London, W1F 9NN, United Kingdom
- Email address: customersupport@fefundinfo.com
- Telephone number: +44 (0) 207 534 7600

What the scope of this policy is

This policy applies to users of FE fundinfo’s products and services accessed from anywhere in the world.

We comply with applicable laws and regulation in the places we operate. Please note that additional policies might apply to your use of our services depending on where in the world you are. If you access our services from Australia, please note that the conditions set out in the FE fundinfo Australia Group Privacy Policy apply in addition to this policy to your use of our services and your personal data, which can be found here: [Click here](#).

The Data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- Contact Data includes billing address, delivery address, email address and telephone numbers.
- Financial Data includes bank account and payment card details.
- Technical Data includes 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 this website.
- Usage Data includes information about how you use our website, products and services.
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

The [FE fundinfo’s Data Processing Schedule](#) provides further details of the types of data processed for each individual FE fundinfo product or service.

We also collect, use and share aggregated data such as statistical data for any purpose. Aggregated data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity.

In limited circumstances, we may collect Special Categories of Personal Data about you (such as details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data) when you use some of our specific products and agree to provide us with such information. The situations and products where we will collect and process such data about you are described and outlined in The [FE fundinfo's Data Processing Schedule](#).

How we collect personal data

When you interact with FE fundinfo we may collect information on you in the following ways:

- We collect information you provide to us when you request or purchase products, services, or information from us, register with us, participate in public forums or other activities on our sites and applications, respond to surveys, visit our physical properties, call our customer support line, or otherwise interact with us using one or more devices. You may provide information in a variety of ways, including by typing or using voice commands.
- We collect information through a variety of technologies, such as cookies, Flash cookies, pixels, tags, software development kits, application program interfaces, and Web beacons, including when you visit our sites and applications or use our applications on third-party sites or platforms using one or more devices, whether or not you are logged in or registered. Please visit our specific Cookies Notice on the relevant product website for further information.
- We collect information using analytics tools, including when you visit our sites and applications or use our applications where they are embedded on third-party sites or platforms.
- We acquire information from other trusted third party sources to update or supplement the information you provided, or we collected automatically, such as when we validate postal address information using third party services. Applicable law may require that you authorize the third party to share your information with us before we can acquire it.

How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data to:

- Provide you with the experiences, products, and services you request, view, engage with, or purchase on our websites.
- Remember you when you visit our websites and to see which product or service information pages and other pages you visit.
- Identify your interests. We may use this to create audience segments that we then use to serve targeted, relevant advertising or content to you (for example, on Trustnet).
- Identify aggregated and anonymised browsing behaviour on the website.
- Target advertising to you based on your location.
- Provide you with information by email, post or phone, about products or services that you request from us, such as email newsletters, marketing emails and special offers, where you have consented to be contacted for such purposes and by such means.
- Ensure the content we display to you on the website is done in the most appropriate and efficient way, such as by identifying the device you are using and formatting the website appropriately.
- Perform our obligations under any contracts between you and us and/or in relation to our terms and conditions.
- Enable you to participate in any interactive features of our service, when you choose to do so.
- Decide how to develop our products.
- We may also send you emails to provide information and keep you up to date with developments on our website or regarding the products and services that you use. It is our policy to have instructions on how to unsubscribe so that you will not receive any future e-mails.

The [FE fundinfo's Data Processing Schedule](#) provides further details of how your data is used for each individual FE fundinfo product or service.

Lawful basis of processing

We will use your personal data in the following circumstances:

- Where you give us your consent to using your personal data (including any Special Categories of Personal Data), for example when you correspond with us or request a newsletter (your consent may be withdrawn by you at any time as set out in this policy).
- For the performance of our contract with you, or to take steps at your request before entering into a contract.
- Where it is necessary for our legitimate interests (or those of a third party); for example, we have a business or commercial reason for using your personal data and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

The [FE fundinfo's Data Processing Schedule](#) provides further details of the product description, the subject matter of processing, the duration of processing, the lawful basis of processing, the purpose of processing, the types of data processed and the data subjects for each individual FE fundinfo product or service.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you OR by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service experience or other transactions.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Children's data

None of our products and services are intended for children under 16. We do not knowingly collect personal data from anyone under 16 years of age.

Sharing personal data

In addition to descriptions mentioned for each product in the [FE fundinfo's Data Processing Schedule](#), we may also share personal data as follows:

- Within the FE fundinfo Group of companies for operational and business purposes.
- With third parties where they provide services on our behalf (for example, companies who help us to operate our websites).
- When we are legally required to do so (for example, to cooperate with investigations initiated by law enforcement or other legal proceedings).

- We may need to share your data with third parties to whom we may choose to sell, transfer or merge parts of our organisation. If this occurs, the new owners may use your personal data in the same way as set out in this privacy policy.

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.

International transfers

We may share your personal data within the FE fundinfo Group and with certain third party providers and partners. This may involve us transferring your data outside of the territory where you are located.

When we transfer personal data out of the United Kingdom, the European Union or Switzerland we will ensure such transfers are in compliance with relevant data protection laws, including, if applicable, [European Commission adequacy decisions](#) (EU GDPR article 45), [UK adequacy regulations](#) (UK GDPR article 45), [Swiss adequacy decisions](#), [UK Standard Contractual Clauses](#) (UK GDPR article 46) or [EU Standard Contractual Clauses](#) (EU GDPR article 46).

When transferring personal data, FE fundinfo will apply a level of protection equivalent with the UK and EU GDPR.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

Data security

The security, integrity, confidentiality and availability of your information are very important to us. We have implemented appropriate technical, administrative, and physical security measures that are designed to protect information from unauthorized access, loss, disclosure, use, and modification. We regularly review our security procedures to consider appropriate new measures, technologies and procedures.

Please bear in mind that the transmission of information via the internet is not completely secure, and whilst we will do our best to protect your personal data, we cannot guarantee the security of data transmitted via our website, or by email, and any such transmission is at your own risk.

Data retention

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. 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.

In working out how long we need to keep your personal data we take into account the amount, nature and sensitivity of the personal data, the potential for harm to arise from its unauthorised use or disclosure, the purposes for which we process it, whether those purposes may be achieved by other means, and applicable legal requirements.

Your legal rights

You have the right to:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal

data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

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 may refuse to comply with your request in these circumstances.

What we may need from you. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond. We try to respond to all legitimate requests within one month. Occasionally it may 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.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

Complaints

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact our data protection office in the first instance at: FE fundinfo's Data Protection Office ("DPO") at dataprotection@fefundinfo.com.

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review.

This version was last updated on 03/01/2023. Historic versions are archived here: [Click here](#).

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.