

### Privacy Notice

Any personal data we collect from you is processed in line with applicable data protection laws including the UK and/or EU General Data Protection Regulation and this notice. When you use our website, our Privacy Policy located on our website applies.

M&G Securities Limited (“we”, “us” and “our”) is the ‘controller’ for the personal data you share with us.

If you have any specific concerns around the privacy of your personal data or require further information about how we manage your personal data, please get in touch with us directly:

By post: M&G Securities Limited, PO Box 9039,  
Chelmsford CM99 2XG

By telephone: 0800 390390

By email: [info@mandg.co.uk](mailto:info@mandg.co.uk)

#### How we collect personal data

As an M&G customer, we collect personal data about you in connection with our products and services in the following ways:

- From your application for an M&G product or service. If you are one of many named investors or representatives of this investment, please ensure this notice is shared with all relevant parties
- From your interactions with us whether over the phone, in person, in writing, or through our website or emails
- Through analysis of your transactions and activities with us and other members of the M&G plc Group\*
- From third parties, such as credit reference agencies, census, market research, comparison websites, surveys, social networks, fraud prevention agencies, loyalty schemes operators, agents working on your behalf, government and law enforcement agencies.

#### How the law protects you

Data Protection law says that we are allowed to use personal data only if we have a proper reason to do so. The law says we must have one of the following reasons:

- to fulfil a contract we have with you
- when it is our legal duty
- when it is in our legitimate interest
- when you consent to it.

A legitimate interest is when we have a business or commercial reason to use your personal data including but not limited to internal administrative purposes, product development and enhancement, preventing fraud, ensuring network and information security.

#### How we use your personal data

The main ways in which we may use your personal data are to:

- Create your account, administer your investments, analyse your investment needs and tailor our services to you
- Communicate with you, and provide information on specific investment products and/or services when you request it
- Help us prevent, detect and investigate fraud and other financial crimes
- Meet our legal obligations
- Maintain the security of our services, as well as to detect and investigate activities that may be illegal or prohibited.

#### Sharing your personal data

We may share your personal data with:

- other members or businesses within the M&G plc Group
- our service providers and third parties who provide services on our behalf, including but not limited to:
  - i. agents and administrators who we use to help run your accounts

- ii. our mailing agents
- iii. credit referencing agencies
- iv. fraud prevention and law enforcement agencies
- regulators, governments, courts, dispute resolution bodies, auditors.

#### We will do this to:

- prevent fraud and other financial crimes
- respond to enquiries and complaints
- undertake transactional analysis
- evaluate the effectiveness of marketing and for market research and training
- create customer groups, statistical and trend analysis
- support the provisions of service
- perform automated decision making and profiling
- comply with legal obligations, court orders, laws or regulations.

Your personal data may be transferred outside of the UK and EEA from time to time to members or businesses within the M&G plc Group or to trusted service providers and third parties. Where this is the case, we will ensure that suitable protection is maintained at all times by ensuring that appropriate safeguards are in place. This may include safeguards based on appropriate standard contractual clauses, adequacy or, in more limited circumstances, a derogation.

In some countries the law may require us to share certain personal data, for example with tax authorities. In these cases, we will only share the personal data with people who have the right to see it.

#### Retaining your personal data

We will retain your personal data for as long as is necessary for the purposes described above. Typically, we will retain your personal data for a minimum of seven years to; fulfil our business purposes, to comply with legal and regulatory requirements, or for any legal claims.

We may keep your data for longer where this is necessary for statistical and historical research purposes. However, we will ensure all personal data is removed where technically feasible. We will maintain the security and protection of any data we hold.

#### Profiling and automated decision making

To help us make fair, efficient and accurate decisions, we may use automated processes. We also use profiling to enable us to personalise our service offerings and related communications. Automated processes or profiling may be used to:

- Open accounts – Checks to ensure you meet the conditions needed, this may include checking residency, nationality and/or financial details
- Tailor our services – We may place you in groups with similar customers. These are called customer segments. We use these to study and learn about our customers and make decisions on what we learn
- Help us detect fraud and prevent fraud and other financial crimes – help to detect possible fraudulent or money-laundering activity or register an account is being used in an unusual way.

See also “Object to processing (Right to object)” regarding your rights for this type of use of your personal data.

#### Your data subject rights

As well as our obligations, and commitment, to respect the privacy of your personal data, you also have certain rights relating to the personal data we hold about you which are outlined below. None of these are absolute and are subject to various exceptions and limitations. You can exercise these rights at any time by **contacting us using the contact details above**.

\*A list of entities is available upon request or by visiting [www.mandg.com/plc-entities](http://www.mandg.com/plc-entities)



## Privacy Notice (continued)

### You have rights to:

Request access to the personal data we hold about you (Data Access Request)	<ul style="list-style-type: none"> <li>You may request access to a copy of the personal data we hold about you.</li> <li>We can refuse to provide personal data where to do so may reveal another person's personal data or would otherwise negatively impact another person's rights.</li> </ul>
Object to processing (Right to object)	<ul style="list-style-type: none"> <li>You may object to us using automated processes, or fully automating decision making, using your personal data except where used to detect, prevent and investigate fraud and other financial crimes.</li> <li>You may also object to us using your personal data for direct marketing analysis. This includes any profiling we perform as part of our direct marketing activities. Once we receive and have processed your objection, we will stop using your personal data for these purposes.</li> </ul>
Request a copy of your personal data (Data Portability)	<ul style="list-style-type: none"> <li>If you gave us the personal data directly, and it was processed electronically, you can request the personal data we hold on you in a commonly used machine-readable format.</li> </ul>
Request that your personal data is deleted (Right to be forgotten)	<ul style="list-style-type: none"> <li>You can ask us to delete the personal data we hold about you when it is no longer required for a legitimate business need, legal or regulatory obligations, where you have withdrawn your consent or is no longer required for the purposes it was collected.</li> </ul>
Amend or correct your personal data (Right to rectification)	<ul style="list-style-type: none"> <li>If you believe that the personal data we hold about you is inaccurate, incorrect or incomplete, please contact us as soon as possible so we can update it.</li> </ul>
Restrict the processing of your personal data (Right to restrict)	<ul style="list-style-type: none"> <li>You may ask us to restrict our processing of your personal data whilst we resolve any complaints you have about the way your personal data is used, require it for a legal claim, believe the personal data is not accurate, we no longer need the personal data, you have objected to the processing of your personal data or if you think our processing is unlawful but you do not want us to delete your personal data.</li> </ul>
Rights in relation to consent (Right to withdraw)	<ul style="list-style-type: none"> <li>At any time, you may withdraw the consent you granted for your personal data to be used for direct marketing.</li> <li>When you withdraw your consent, it will not affect the lawfulness of any past activities we have undertaken based on the previous consent.</li> </ul>

### How we respond to your rights

You can exercise these rights at any time by **contacting us using the contact details above**.

- We may need to validate your identity before we can respond to your request.
- If we are unable to confirm your identity, or have strong reasons to believe that your request is unreasonably excessive or unfounded, we may deny it.
- Once we have validated your identity, we aim to respond to your requests within 30 days and no later than three months from receipt of complex requests. We will let you know if we need additional time to complete.
- We will let you know whether we accept, or refuse, your request.

### Security

We take all reasonable precautions to keep your personal data secure, including safeguards against unauthorised access, use, or data loss. This includes ensuring our staff, partners and any third parties who perform work on our behalf comply with security standards as part of their contractual obligations.

### Making a data protection complaint

If you have any concerns about the use of your personal data, or the way we handle your requests relating to your rights, you can **raise a complaint directly with us using the contact details above**.

If you are not satisfied with the way we handle your complaint, you are entitled to raise a complaint directly with the UK Information Commissioner's Office via the details available on their website: [www.ico.org.uk](http://www.ico.org.uk).

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