

Privacy Policy

Who we are

This section gives you the legal name of the company who holds your personal information – known as the 'legal entity'.

The Linear group consists of; Linear Investments Limited and Linear Investment Partners Limited

Contacting us regarding data privacy

If you have any queries regarding the topics set out in this privacy notice you can contact us on: GDPR@linearinvestment.com or through your normal Account Manager.

Your Legal Protection

Data Protection law says that we are allowed to use personal information only if we have a proper reason to do so. The law says we must have one or more of these reasons; carrying out an agreement we have with you, fulfilling a legal obligation, because we have a legitimate business interest or where you agree to it.

Linear do not sell your information to any third parties.

An individual has certain rights regarding his or her personal information, subject to local law. These include the right to:

- request a copy of the personal information we hold about them;
- request that we supply them (or a nominated third party) with an electronic copy of the personal information that they or you have provided us with;
- inform us of a correction to their personal information;
- exercise their right to restrict our use of their personal information;
- exercise their right to erase their personal information; or
- object to particular ways in which we are using their personal information.

An individual's ability to exercise these rights will depend on several factors and in some instances, we will not be able to comply with this request e.g. because we have legitimate grounds for not doing so or where the right doesn't apply to the particular data we hold on that individual. If you or your business partners would like more information on these rights, or wish to exercise them, or to update or correct your information if it changes, or if the personal data we hold about you or your business partners is inaccurate, please contact us on the details above.

Information Gathered

Linear collect information about you from different places including:

- directly from you
- from a third party acting on your behalf e.g. an intermediary or broker
- from other Linear companies and our Appointed Representatives
- from publicly available sources
- when we generate it ourselves
- from other organisations, such as credit reference agencies.

We'll only collect your information in line with relevant regulations and law and this may relate to any of our products or services you apply for, currently hold or have held in the past.

Information we hold about you and people connected to your business will often come from you directly (e.g. when you apply for a new product), this will include the following:

- personal details (e.g. name, date of birth, passport information or other identification information);
- contact details (e.g. phone number, email address, postal address or mobile number);
- transactional details (e.g. payments you make and receive);
- financial information (e.g. bank account number, credit or debit card numbers, financial history) including information you provide for the purposes of providing payment and remittance services and account information services regarding accounts you hold with other providers;
- information about criminal convictions and offences (e.g. for assessment of individuals to be registered with regulatory authorities); and
- information about any other Linear products and services you currently have, you have applied for, or you have previously held.

We will also hold information we collect about you from other sources, this will include:

- the way you are using our services;
- your interactions with us, for example, through social media or other channels;

- the way you use your accounts, including information about payments you make or receive such as the date, amount, currency and the details of the payee or payer;
- our own records about any other accounts (including personal accounts) or products you, or your business partners, have with us or other providers;
- where we think it is necessary, our own records about your shareholders (including beneficial owners), names of suppliers and companies you use or may have contractual or other agreements with, and other related individuals;
- information from credit reference agencies and fraud prevention agencies;
- publicly available information about your business which is available online or otherwise;
- criminal record checks and information;
- employers;
- joint account holders, other Directors, Partners, signatories or employees in your business;
- people appointed to act on your behalf;
- credit reference agencies (who may check the information against other databases – public or private – to which they have access);
- other banks and financial institutions (for example because you have asked us to transfer assets from or to your account with another provider);
- fraud prevention agencies; and
- publicly available sources, such as media stories

You're responsible for making sure you give us accurate and up to date information. If you do not provide personal data that we tell you is mandatory, it may mean that we are unable to provide you with the services and/or perform all of our obligations under our agreement with you. If you provide information for another person on your account, you'll need to tell them how to find the Privacy Notice and make sure they agree to us using their information for the purposes set out in it.

How we use your information

We must have a legal basis to process your personal data. In most cases, the legal basis will be one of the following:

- to allow us to take actions that are necessary in order to provide you with the product / service (performance of a contract), for example, to make and receive payments;
- to allow us to comply with our legal obligations, for example, obtaining proof of identity to enable us to meet our anti-money laundering obligations;
- to meet our legitimate interests, for example, to understand how customers use our services and to develop new services, as well as improve the service we currently provide;
- where we have your consent to do so; or
- in the case of special categories of personal data, that it is in the substantial public interest.

The table below sets out the purposes for which we use your personal data and our legal basis for doing so.

Where we are relying on a legitimate interest, these are also set out below:

What we use your personal data for	Our basis for doing so
<p>To provide, manage, improve and personalise our services to you.</p> <p>Including but not limited to;</p> <ul style="list-style-type: none"> • Communicate with you about your products / services for legal, regulatory and services purposes • Managing complaints and undertake remediation activities • Provide Payment initiation and account information services 	<ul style="list-style-type: none"> • To perform our duties under our contract with you • The law requires • It is in our Legitimate Interest to ensure your account is well managed and you are provided with high a level of service
<p>To communicate to you marketing material and other information relating to products and services offered by us</p>	<ul style="list-style-type: none"> • It is in our Legitimate Interest to provide you with information about our products and services that may be of interest

<p>and/or associated partners of the Linear Group</p>	<ul style="list-style-type: none"> • We have your consent to do so
<p>Recording of communications to you (Including voice recording) to check your instructions to us, and to analyse, assess and improve our services and for quality and training purposes.</p>	<ul style="list-style-type: none"> • To perform our duties under our contract with you • The law requires • It is in our Legitimate interest to train our staff, develop and improve our systems and provide our customers with a high level of service
<p>To conduct Anti-Money Laundering, Know Your Customer, Due Diligence and other Security checks on you both prior to providing our services to you and on an ongoing basis.</p>	<ul style="list-style-type: none"> • To perform our duties under our contract with you • The law requires • It is in our Legitimate interest to detect, prevent and investigate fraud, money laundering and other crimes and to verify your identity in order to protect our business
<p>To enforce any of our rights or other obligations we are entitled to under our agreement(s) with you, including debt recovery and to protect ourselves against harm.</p>	<ul style="list-style-type: none"> • To perform our duties under our contract with you • The law requires • It is in our Legitimate interest to run our business in a prudent manner and ensure our rights are protected and enforced
<p>To comply with regulatory and legal obligations to which we are subject and cooperate with regulators and law enforcement bodies.</p>	<ul style="list-style-type: none"> • The law requires • It is in our Legitimate interest to protect our business

What we use your sensitive personal data for	Our basis for doing so
Our Anti-Money Laundering, Know Your Customer, Due Diligence and other Security checks may reveal details of criminal convictions or offenses committed by you	<ul style="list-style-type: none"> • The law requires • It is in our Legitimate Interest to detect, prevent and investigate fraud, money laundering and other crimes and to verify your identity to protect our business • It is in the Substantial Public interest
Our Anti-Money Laundering, Know Your Customer, Due Diligence and other Security checks may reveal details of your political opinions	<ul style="list-style-type: none"> • The law requires • It is in our Legitimate Interest to detect, prevent and investigate fraud, money laundering and other crimes and to verify your identity to protect our business • It is in the Substantial Public Interest
To comply with regulatory and legal obligations to which we are subject and cooperate with regulators and law enforcement bodies.	<ul style="list-style-type: none"> • The law requires • It is in our Legitimate interest to protect our business • It is in the Substantial Public Interest

Who we can share your information with

We may share your information with other partner companies or group members to provide our services to you. We may also share your information with other entities such as regulators, banks, brokers, insurers, clearing and settlement agents as well as credit reference and fraud prevention agencies.

Sharing information about you with tax authorities

We may be required by law or regulation to share information about your accounts with the UK or relevant tax authorities, either directly or via the local tax authority. The tax authority we share the information with could then share that information with other appropriate tax authorities.

If we need extra documents or information from you about this, you must supply them. If you don't, we may need to close your account or, if the law or other regulations require us to do so, we'll withhold parts of certain payments received into your account, and pass the withheld funds to the relevant tax authorities.

Transferring your information overseas

Your information may be transferred and stored in countries outside the European Economic Area (EEA), including some that may not have laws that provide the same level of protection for personal information. When we do this, we'll ensure it has an appropriate level of protection.

How long we'll keep your information

We'll keep your information for as long as you have a relationship with us. After the relationship ends, we'll keep it where we may need it for our legitimate purposes e.g. to help us respond to queries or complaints, or for other reasons e.g. fighting fraud and financial crime, and responding to requests from regulators.

Cookies

We may use cookies and similar technologies on our websites, mobile apps, and in our emails. Cookies are text files that get small amounts of information, which your computer or mobile device stores when you visit a website or use a mobile app. When you return to the websites or mobile apps – or visit websites and mobile apps that use the same cookies – they recognise these cookies and therefore your device.

We use cookies to do many different jobs, like letting you navigate between pages efficiently, remembering your preferences and generally improving your online experience. They can also help ensure that the ads you see online are more relevant to you and your interests.

Right not to have Automated decisions made about you

You have the right not to have decisions made about you solely based on automated decision-making processes where there is no human intervention, where such decisions will have a significant effect on you.

However, Linear does not make any decisions based on such processes.

Changes to the privacy notice

A copy of this privacy notice can be requested from us using the contact details set out above. We may modify or update this privacy notice from time to time.

Where changes to this privacy notice will have a fundamental impact on the nature of the processing or otherwise have a substantial impact on you, we will give you sufficient notice so that you have the opportunity to exercise your rights (e.g. to object to the processing).

More information on the GDPR

To find out more about the GDPR, follow the links below to read the guidelines and information published by the Information Commissioner's Office:

- [ico.org.uk - GDPR guide to individual rights](https://ico.org.uk/guides/gdpr/guide-to-individual-rights)
- [ico.org.uk - guide to GDPR](https://ico.org.uk/guides/gdpr/guide-to-gdpr)