



Privacy Policy



Privacy Policy Summary

This Privacy Policy explains how we use personal information that we collect about you (such as your home address, email address, telephone number and financial information) ("your information"), how we share your information and the steps we take to protect your information. Specifically, this policy covers:

- How we collect your information
- How we use your information
- Information Sharing
- Information Sharing Outside of the UK
- Information Security
- Cookies
- Your rights
- How to contact us

Before you provide us with any personal information (such as your name, address or date of birth) and / or when you register with us you should read this Privacy Policy. When you provide us with any personal information and when you register with us or ask us to provide you with any of our products or services, you agree that we may handle your information in accordance with this Privacy Policy. If you do not agree with the terms of this Privacy Policy then you should not provide us with any of your information.

Please note that we may update this Privacy Policy from time to time by posting a new version on our website and/or providing you with express notice of specific changes. You should check our website periodically for any changes which may affect you.

How we collect your information

We may collect your information when you indicate that you would like to receive any of our products and services, when you register with us, when you complete forms online, when you speak with us over the telephone, when you write to us and when you visit our website. We will collect details of transactions you carry out through our site and of the fulfilment of such transactions.

Where you permit the use of cookies (see the section below on cookies), we use these to collect information about your use of our website, to allow us to provide you with our products and services and when you use our online service. If you register with us or if you continue to use our site, you agree to our use of cookies.

How we use your information

Requesting access to tools and information

You may wish to have access to certain tools and information made available on our site before you decide that you would like to register to use our services, including our foreign exchange and payment service. We may collect your information as part of this access and use your information so that we can supply you with information about our services, our products and relevant market information.

Registration and administration

We use your information to enable you to register with us and, once your registration with us is complete, for the administration of your account, to contact you, to update our records about you, and to respond to and process your queries and requests.

Our products and services

We use your information so that we can supply you with our products and services which you use or have requested and to meet our contractual obligations to you. We also use your information to notify you about changes or developments relating to our products and services which you use or have requested.

Prevention and detection of crime

HiFX PLC and the provision of our products and services are subject to the Money Laundering Regulations 2007 and regulation by HM Revenue and Customs. Some of our products and services are also subject to regulation by the Financial Services Authority ("FSA").

This means that we must verify the information you give us as part of our customer due diligence obligations. In many cases this verification will happen automatically through the use of an electronic identification tool. Sometimes we may ask you to provide us with copies of personal identification documents (such as your passport or driving licence) and a proof of address (such as a bank statement or utility bill).

We may be required by the Money Laundering Regulations 2007, by HM Revenue & Customs, by the FSA or other regulatory bodies, by the police or other law enforcement agencies, by a court or otherwise by law to use your information in the detection, prevention or prosecution of crime, tax evasion or fraud.



Marketing

We may share your information with other members of the HiFX Group of companies. Further information about the HiFX Group, together with contact information and details of its products and services, can be found at www.hifx.co.uk.

We and the HiFX Group companies with which we share your information may use your information to enable HiFX Group (which includes us) to review, develop and improve its products and services; to help identify products and services that may be of interest to you; for statistical research and analysis; and, if you do not indicate that you do not wish your data to be so used, for direct marketing purposes.

HiFX Group may use your information to send you information concerning products or services which you use and other HiFX Group products or services which we think may be of interest to you. This may include information concerning promotions or offers which could benefit you. If you would prefer not to receive information concerning products or services which we think may be of interest to you, including special offers and promotions, then please indicate by ticking the relevant box when prompted or thereafter please contact us to update your preferences.

HiFX Group may use your information to send you information concerning products or services provided by our carefully selected partners where you have asked us to do so. This may include information concerning removals, overseas banking, insurance and other services complementary to your needs. You will be asked to indicate whether you would be interested in such information by ticking the relevant box when prompted.

To change your HiFX Group marketing preferences please write to HiFX, Morgan House, Madeira Walk, Windsor, Berkshire SL4 1EP or email info@hifx.co.uk. You are entitled to change your marketing preferences at any time.

Monitoring

We monitor and record our telephone calls with you and use any transcripts of them:

- so we can be sure we fully understand the instructions you give us and our obligations to you
- so we have a clear record of the products and services you have requested
- for the purposes of the prevention or detection of money laundering or crime, including fraud
- for the purposes of training and quality control.

Information sharing

HiFX Group

We may share your information with other members of the HiFX Group of companies where we need to do so to provide you with any of the products or services you have requested or where you have asked us to do so. We may share your data with other members of the HiFX Group of companies where this may be to provide services outside of normal UK business hours or when you have or otherwise accepted other HiFX Group company terms and conditions because you would like to retain a local relationship in more than one region and/or obtain products and services from another HiFX Group company.

Your instructions

We may share your information with anyone (for example, an agent) who you have told us or who we are otherwise aware is acting on your behalf, or who introduces you to us, or who you have asked us to contact.

Legal requirements

We may have to share your information with a government body or regulatory authority (such as HM Revenue and Customs or the FSA), with the police or other law enforcement agencies (for example, in connection with criminal prosecutions, money laundering or fraud investigations), or with other persons or bodies by order of a court or to meet a legal or regulatory requirement or for other lawful reasons, such as for taxation or audit purposes.

Credit controls or debt collection agencies

We may share your information with credit control or debt collection agencies, for example, if you owe us money and we engage their services to recover it from you.

On a business sale or purchase

If we decide we want to sell our business or receive an offer to buy our business we may have to share your information with a prospective purchaser and their legal, financial or other advisers. In these circumstances, we will take appropriate steps to ensure that your information is properly protected.

Others

We will not normally share your information with anyone else unless we need to do so to provide you with our products or services which you use or unless you have asked us to do so.

You may sometimes ask us about, or we may sometimes ask you if you are interested in, products or services which we are unable to provide but which someone else we know ("HiFX Contact") may be able to provide (for example, travel, furniture removal, haulage or financial services). We will never pass your information to a HiFX Contact unless you have asked us to do so. Please note that we are not responsible for and cannot be liable to you for any products or services of any HiFX Contact or any acts or omissions of any HiFX Contact.



Information Sharing Outside of the UK

The nature of our products and services means that we may need to share your information with people or businesses based in countries outside of the United Kingdom, including in the EEA and outside the EEA. The EEA (or "European Economic Area") comprises the EU member states, Iceland, Lichtenstein and Norway.

The countries to which we may need to send your information would normally be obvious to you. For example, if you have instructed us in connection with a purchase of a property in France then we will usually be dealing with people or businesses based in France (which may include banks, lawyers and estate agents) who are connected with the purchase in order to fulfil our contractual obligations to you.

In many instances we will be dealing with people or businesses which you have asked us to deal with or who you already know or who already know you.

We may share your information with HiFX Group companies based outside of the EEA in order to provide you with the products and services you have requested and/or where you have signed or otherwise accepted the terms and conditions of such HiFX Group companies.

Information Security

General

We use your information only in accordance with this Privacy Policy and take all steps reasonably necessary to ensure we keep your information secure, for example by:

- encrypting our online service via a secure 128-bit Verisign service
- providing you with password protection and a log-in process designed to protect against certain well known viruses
- making our online service automatically log you out after several minutes of non-use
- disabling your access after multiple failed log-in attempts
- maintaining our servers in multiple secure locations and having our online service penetration tested regularly by external experts.

Information security outside of the UK

All countries in the EEA have similar standards of legal protection for personal information. For this reason, we will not normally take further steps to ensure your information is protected when we share it with other people or businesses based in the EEA.

Where we share your information with people or businesses based outside of the EEA, if they are a HiFX Group company or, based in a country approved by the Information Commissioner, or are a signatory to what is known as the "Safe Harbour" regime (which applies to certain companies in the USA), then we will not normally take further steps to ensure your information is protected.

Where we share your information with people or businesses based outside of the EEA and they are neither a HiFX Group company nor based in an Information Commissioner approved country nor a signatory to the Safe Harbour regime, we will normally take appropriate steps to ensure that your information is suitably protected.

Your instructions

Where we share your information with people or businesses which you ask us to deal with or [who you already know or who already know you], wherever they are based, we will not normally make any further enquiry concerning them or take any further steps to ensure your information is protected.

Worldwide Web

The Internet is not a secure environment.

While we take reasonable measures to keep your information secure, we cannot guarantee your online data security. We are not liable to you for any loss of data, injury or harm which occurs to you as a result of the transmission of your information over the Internet, unless this occurs as a result of our negligence or wilful misconduct.

Cookies

Cookies are harmless text files that web servers can store on your computer's hard drive when you visit a website and allow a server to recognise you when you revisit. They are commonly used by companies providing online products and services.

There are two main types of cookie: "transient" cookies (which can recognise you as you move between pages, exist only for your visit and are deleted on exit) and "persistent" cookies (which can store and re-enter log-in information so you don't need to remember them and stay on your machine until their expiry or deletion).



We use both types of cookies to try and make using our website as straightforward as possible and help us maintain standards. For example, we use cookies to: gather journey information, help ensure your privacy, store your log in details or other information required for tools provided for you to use, store details of your preferences, and generally to evaluate the performance of our products and services and enhance your customer experience. We use cookies that we create and cookies that are created by third parties (for example, by those who supply products and services to us so we can provide you with our products and services, such as hosting services).

You are not obliged to accept cookies that we send to you and you can modify your browser so that it will not accept cookies. You should follow the instructions in your browser (usually located within the "Help", "Tools" or "Edit" facility) to enable or disable cookies. However, please note that in order to view and/or use some of our products and services, and to enable some of the protection we provide for your financial and personal information, cookies are required on your browser. Disabling the use of cookies may therefore affect our ability to provide you with our products and services, the effectiveness of our products and services or our ability to properly protect you.

Further information concerning cookies and how to manage them to suit your preferences can be found by visiting <http://www.allaboutcookies.org> or <http://www.cookiecentral.com>.

Your rights

We are required to handle information which we hold about you that is capable of identifying you (either alone or with any other information we may hold about you) in accordance with the Data Protection Act 1998 ("the Act"), which regulates the use of "personal data" in the United Kingdom.

You have the right under the Act to ask us in writing for details concerning the "personal data" we hold about you, including a description of that data, the purposes for which it is being used and to whom that data has been or may be disclosed. We may charge you an administration fee for providing you with this information.

You can find out more about the Act and your rights by visiting the website of the Information Commissioner at www.ico.gov.uk. The Information Commissioner's Office can also be contacted by telephone on 08456 306060.

How to contact us

If you have any questions about our Privacy Policy or your information, please contact us in writing by email at dataprotection@hifx.co.uk or by post to the Compliance Officer, HiFX PLC, Morgan House, Madeira Walk, Windsor, Berkshire SL4 1EP.

HiFX PLC, a company registered in England with Company No. 3517451, and registered office at Morgan House, Madeira Walk, Windsor, Berkshire SL4 1EP, United Kingdom. Email: info@hifx.co.uk
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