

1. How we deal with your data. Our Privacy Policy.

The data within MyArgentis is managed by a company called Moneyinfo Limited, company number 03508395 (“moneyinfo”). This is the privacy policy that will apply to how we and Moneyinfo deal with the information that we hold as a result of your use of MyArgentis.

This policy sets out the basis on which the personal or other data collected from you by Argentis Wealth Management Limited and Active Financial Partners Limited, (‘we’, ‘us’ or ‘our’) will be processed by Moneyinfo on our behalf and how that information will be used. It describes the kinds of information we may collect from or about you, how we process that information and your rights to access and control our use of your information.

1.1 We are the controller and Moneyinfo are the processor of your personal data.

MyArgentis is supplied to you by Moneyinfo on our behalf. We are the controller of your personal data and Moneyinfo are a processor appointed by us.

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.

1.3 The confidentiality & security of your data is maintained at all times.

The security and privacy of your information is extremely important to us and we have implemented appropriate technical and organisational security measures to ensure that your information and personal data is protected.

The servers on which your data is stored are located in a secure facility and we use data and password encryption and the latest in electronic and physical security measures to give you the best possible protection. All information is securely transmitted using SSL standard encryption which creates an encrypted connection between your browser and our servers and your information is always stored in an encrypted format.

2. What information is held about you?

Moneyinfo hold personal data and other information in MyArgentis as is necessary to provide the service. The personal data processed is provided to Moneyinfo by us, providers and platforms that we have instructed to provide Moneyinfo with data on your behalf, or it can be directly provided by you as the end-user of MyArgentis where you have added it to MyArgentis if you have the permissions to do so.

The types of personal data that are processed include -

- **Identity:** Personal identifiers, contacts and characteristics (for example, your name, national insurance number) or demographic information such as your date of birth, gender or marital status.
- **Contact:** Information about how we may contact you, including your email address and telephone number.
- **Employment:** Details about your who you are employed by, your job title, your visa or your tax status.
- **Financial:** Your financial information such as your income, expenditure, assets or liabilities or bank account information including your account type and details, account or credit card balances, account transactions or other details, if you choose to add your accounts through Open Banking.

- **Other:** Any other details about you that are stored in documents that you may have uploaded to the service.
- **Account:** Your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Technical:** Information that allows us to understand how you use our services e.g. from your log in history or page visits.
- **Usage:** Moneyinfo may also collect certain information about you and your use of our service by using cookies and other tracking technologies. This will record information such as the IP address, domain name, web browser and operating system used to access the service, your location and browsing history, including the pages visited, the time spent on each page, the time and date of each visit. This information is used to measure the use of the service and improve its content, and would not identify you without being combined with other information. For more information about how and why Moneyinfo use cookies and how you can change your cookie settings, please see the Cookie Policy below.

Moneyinfo may also collect and use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data is data which may be derived from your personal data, for example, Moneyinfo may aggregate your usage data to calculate the percentage of users accessing a specific feature, but the outcome of such aggregation is anonymised and therefore it is not considered personal data in law, as it will not directly or indirectly reveal your identity.

Special Categories of Personal Data.

Moneyinfo may also process special categories of personal data about you. This can include 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 or any information about criminal convictions and offences, if it is included in a document that you upload to MyArgentis.

2.1. How your data is collected.

Moneyinfo use different methods to collect data from and about you including -

- **Data from us.** Moneyinfo provide this service to you on our behalf. We may provide Moneyinfo with your identity, contact, employment or financial information, for them to comply with their contractual obligations.
- **Data from direct interactions.** You may give Moneyinfo your identity, contact, employment, financial, account and other data when you interact with the features and functionality within MyArgentis directly. This includes personal data you provide when you create an account, fill in forms or questionnaires or upload documents.
- **Data from automated technologies or interactions.** As you interact with MyArgentis, Moneyinfo will automatically collect technical data about your equipment, browsing actions and patterns. They collect this personal data by using cookies and other similar technologies. Please see section 6.4 (**Cookies and how we use online session information**) of this policy for further information about how Moneyinfo use cookies.

2.2. Data accuracy within Moneyinfo.

The information displayed in Moneyinfo is only as up to date as the information supplied to Moneyinfo by third party sites, providers and us. Moneyinfo do not check the data they receive for accuracy and the information displayed may be more up to date when obtained directly from the relevant parties.

You should always check with us before making any financial decisions on the basis of information displayed within Moneyinfo.

Moneyinfo do not assume responsibility for the timeliness, accuracy, deletion, non-delivery or failure to store any user data, communications or personalisation settings.

2.3 Legal basis for processing your personal data.

We will only process your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances -

- a) Where processing is necessary for the performance of a contract to which you, the data subject, are a party to or in order to take steps at your request prior to entering into a contract.
- b) Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- c) Where you have provided your consent to us processing your personal data for a specified purpose.
- d) Where we need to comply with a legal obligation.

Where we process Special Categories of Personal Data or information about criminal convictions and offences, we need an additional legal basis to process that information.

We have set out below, in a table format, a description of all the ways we expect Moneyinfo to process your personal data on our behalf, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate, and what our additional legal basis for processing is, where we require one.

Please note that we may process your personal data under more than one lawful basis, depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal basis we are relying on to process your personal data, where more than one basis has been set out in the table below.

Purpose/Activity.	Type of data.	Lawful basis for processing, including the basis of legitimate interest.
To allow you to set up an account in order to enable us to provide MyArgentis.	(a) Identity (b) Contact (c) Employment (c) Account	Performance of a contract. Moneyinfo contracted by us to provide MyArgentis to you.

Purpose/Activity.	Type of data.	Lawful basis for processing, including the basis of legitimate interest.
To allow you to upload documents to MyArgentis.	(a) Identity (b) Contact (c) Employment (d) Financial (e) Other	Performance of a contract. Moneyinfo contracted by us to provide MyArgentis to you. Where documents contain Special Categories of Personal Data or information about criminal convictions and offences, in addition to the above lawful basis, we and Moneyinfo are entitled to process this data because you have consented by freely choosing to upload that specific document to MyArgentis.
To respond to requests made by you.	(a) Identity (b) Financial (c) Account	Performance of a contract. Moneyinfo contracted by us to provide MyArgentis to you.
To enable third-party contractors to provide integrated services to MyArgentis (such as data feeds to value your investments).	(a) Identity (b) Employment (c) Financial (d) Account	Performance of a contract. Moneyinfo contracted by us to provide MyArgentis to you.
To alert you to service changes and updated information.	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	Performance of a contract. Moneyinfo contracted by us to provide MyArgentis to you.
To analyse how the service is being used so that we can improve the service.	(a) Identity (b) Technical (c) Usage	Performance of a contract. Moneyinfo contracted by us to provide MyArgentis to you.
For troubleshooting problems, detecting and protecting against error, fraud or other criminal activity.	(a) Identity (b) Profile (c) Usage (e) Technical	Performance of a contract. Moneyinfo contracted by us to provide MyArgentis to you.

Purpose/Activity.	Type of data.	Lawful basis for processing, including the basis of legitimate interest.
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you.	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Performance of a contract. Moneyinfo contracted by us to provide MyArgentis to you.
For benchmarking and data analysis purposes to improve MyArgentis and other products/services, marketing, customer relationships and experiences.	(a) Technical (b) Usage	Performance of a contract. Moneyinfo contracted by us to provide MyArgentis to you.

2.4. Your data belongs to you and you can delete your data at any time.

Your data is yours. You can request it is removed from MyArgentis at any time by contacting us. When you request us to delete your account from MyArgentis, your data will be permanently deleted from the Moneyinfo primary production servers and further access to your account will not be possible. This deletion will also disconnect any connections we have established to your account information.

Documents you upload to MyArgentis can be deleted by you, us &/or Moneyinfo. Once deleted, they are removed from MyArgentis and Moneyinfo do not retain copies.

However, Aggregated Data which has been derived from your personal information, may remain on Moneyinfo’s production servers indefinitely. Your data may also remain on a backup server or media for a limited period whilst backup cycles complete. MyArgentis keeps backup data to ensure that we can continue to provide the service to you in the unlikely event of malfunction of the Moneyinfo primary production servers. We and Moneyinfo also reserve the right to retain and use any Aggregated Data derived from or incorporating your information.

If you have any queries about how we use your personal data, please contact us in the first instance at DPO@argentis.co.uk or you can email Moneyinfo on support@moneyinfo.com.

2.5. How long we retain your data.

All data held about you within the MyArgentis database is encrypted and securely stored and retained whilst you continue to be subscribed to the service. The data held is visible to you via the MyArgentis service and you have control over who can access any data you add yourself.

Moneyinfo will only retain your personal data for as long as it is necessary to fulfil the purposes they collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. Moneyinfo may retain your personal data for a longer period in the event of a complaint or if Moneyinfo reasonably believe there is a prospect of litigation in respect to their relationship with you or us.

To determine the appropriate retention period for personal data, we and Moneyinfo consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we and Moneyinfo are processing your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

2.6. Change of Purpose.

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

Please note that we and Moneyinfo may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

3. Sharing your information with third parties.

Data is visible by you and may be visible to any related third parties linked to you. You can set privacy controls on any data you add yourself and choose which related parties you wish to share your data with.

Your data may be shared with us and our staff as necessary to provide MyArgentis to you and in our capacity as your financial planner or wealth manager. By default, our access does not include the ability for us to view or access your individual bank, credit card or loan transactions, if you have chosen to add these using the Open Banking features. This data can only be viewed by you unless you choose to share it with us.

To provide elements of the service to you, Moneyinfo use third-party data processors (“Sub processors”). They have contracts in place with these Sub processors that ensures these Sub processors cannot do anything with your personal information unless instructed by Moneyinfo. These Sub processors will not share your personal information with any organisation apart from Moneyinfo. The Sub processors will hold your personal information securely and retain it only for the period Moneyinfo instruct. Moneyinfo only use Sub processors which have been approved by us.

In providing MyArgentis, Moneyinfo also use technology supplied by a company called Investnet Yodlee Inc (“Yodlee”). Moneyinfo have an agreement with Yodlee that allows them to use the Yodlee technology but they are not affiliated to or in any other way connected to Yodlee, which is an independent company.

3.1. Controlling your Privacy Settings

You can directly control who can view any of the data which you have added to MyArgentis by use of the privacy control settings. See my privacy settings by clicking on the Me icon within MyArgentis.

3.2. Your bank and credit card statements are not visible to anyone but you.

Statements from your bank, building society or credit card accounts held on the MyArgentis can only be accessed by you using your secure log in credentials. By default, your statement data is not visible to anyone but you.

This data is not visible to us and is only accessible to employees of Moneyinfo in strictly controlled circumstances as required for support purposes. This access is only given to authorised individuals at Moneyinfo at the point a support query is raised on your account and in accordance with strict internal procedures.

3.3. MyArgentis employees can access your data only in strictly safeguarded circumstances.

Moneyinfo employees do not have direct access to the MyArgentis database except where necessary for system management, maintenance, monitoring and backups. In this scenario, only specific nominated individuals have access. Such access is only given and used in accordance with strict internal procedures, in order to operate, develop or enhance the Service. These individuals have passed stringent employment vetting checks and are bound by confidentiality obligations and are subject to disciplinary procedures, including termination of employment and potentially criminal prosecution, if they fail to meet these obligations.

3.4. Your log-in credentials are kept secure and encrypted in the MyArgentis Service.

If you choose to connect your bank or credit card accounts using Open Banking your login credentials are managed by your bank, building society or credit card provider and are not accessible to or stored by us or Moneyinfo.

Any other online login username, passwords, or security numbers you enter into the MyArgentis service will never be accessible to any of our employees or anyone from Moneyinfo. This information is kept separately from the MyArgentis service and your other personal data, as an additional security measure.

You are responsible for ensuring that your login credentials are kept secure and not disclosed to any other party. In the event that you feel your log in credentials have been obtained by another party you should change your password and notify us immediately.

3.5. Disclosure of your information to protect our rights or if required by law.

Notwithstanding anything to the contrary, we and Moneyinfo have the right to share or disclose your information at our sole discretion, should we deem that the disclosure of such information is necessary or appropriate:

- a. to enforce our rights against you or in connection with a breach by you of our Privacy or Security Policies or the MyArgentis Terms of Use;
- b. to prevent prohibited or illegal activities; or
- c. when required by any applicable law, regulation or other legal process.

4. Processing of data outside of the UK.

When it is necessary for us to transfer your personal information outside of the UK, Moneyinfo ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented. This means Moneyinfo will only transfer your personal data -

- a) to countries that have been deemed to provide an adequate level of protection for personal data; or
- b) where a service provider is based in a country that has not been deemed to provide an adequate level of protection for personal data, Moneyinfo will use specific contracts such as the Standard Contractual Clauses which have been approved for use by the Information Commissioner's Office (the UK's regulatory body for information rights) ("ICO") or the relevant European regulatory body. These specific contracts give personal data the same protection it has in the UK or the EU as applicable.

The Yodlee service, which enables Moneyinfo to provide you with Open Banking features and the ability to connect your other online accounts such as pensions or investment accounts, is a US based service and information retrieved will be processed by Yodlee's servers based in the US. At present, the US has not been deemed as providing an adequate level of protection for personal data. We have therefore included in our contract with Yodlee specific contractual terms which govern their processing of personal data in their role as a Sub-processor, and mandates that they have appropriate security measures and controls in place to ensure that the transfer of your data is in accordance with applicable UK data protection laws and regulations.

5. Other information regarding your data.

5.1. Cookies and how Moneyinfo use online session information.

Moneyinfo may store information about you in a cookie, a small file that is sent by the web server to your computer, which Moneyinfo can access when you make return visits to MyArgentis. Storing cookies allows website operators to remember what its users' preferences are. Moneyinfo use cookies to keep track of your choices in the MyArgentis. The cookies are encoded so that they can only be accessed by Moneyinfo. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. Please note that if you disable or refuse cookies, some parts of MyArgentis may become inaccessible or not function properly.

If you would like to delete any cookies that are already on your computer, please refer to the instructions for your file management software to locate the file or directory that cookies are stored in. If you would like to stop cookies being stored on your computer in the future, please refer to your browser manufacturer's instructions by clicking "Help" in your browser menu. Further information about deleting or controlling cookies is available at www.aboutcookies.org.

Moneyinfo may collect information when you visit MyArgentis such as the pages you have visited, your browser type or the average time you have spent on the site. Please note that when you visit MyArgentis, Moneyinfo may also log your IP address, a unique identifier for your computer or other access device. This information is used to improve the design or functionality of the service or to alert you to any compatibility issues.

Moneyinfo use cookies to enhance the security of the service and to compile anonymous statistics about the use of the service. Here is a list of the main cookies that Moneyinfo use and what they are used for:

Category	Name	Purpose
Session	.NativityAuth	This cookie is strictly necessary for MyArgentis to function correctly. It remembers the user who logged in to the system. It is removed when the browser is closed.
Session	__RequestVerificationToken	This cookie is strictly necessary for MyArgentis to function correctly. It is used to protect the user against cross site request forgery. It is removed when the browser is closed.
Persistent	ai_user	This cookie is to determine if the user has previously visited MyArgentis (within the past year). This cookie is created on first visit to the MyArgentis website and expires one year after created.
Session	ai.session	This cookie is to link together your navigations within MyArgentis to help support developers to understand what actions you took and in what order. This cookie is created on first visit to MyArgentis and expires 30 minutes after it is created.
Persistent (Analytics) Note: Optional addition to the privacy policy if GA is switched on	_ga	We may set up Google Analytics on MyArgentis. These cookies collect information about how you use the site. This information is collected anonymously and is used by us to understand how our users are engaging with the service. These cookies expire after 2 years.

We will get your consent before using any cookies which are not strictly necessary.

6. Your data protection rights

You have rights under data protection laws in relation to your personal information. This includes the following rights:

- **Right of access** (commonly known as a "**data subject access request**"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Right to rectification**. This enables you to have any incomplete or inaccurate information we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Right to erasure**. This enables you to ask us to delete or remove personal information 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 information where you have 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.

- **Right to object to processing.** Where we are relying on a legitimate interest (or those of Moneyinfo or a Sub processor to process your personal data and you feel that such processing impacts on your fundamental rights and freedoms, you can object to that processing. 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.
- **Right to restriction of processing.** This enables you to ask us to suspend the processing of personal information about you, for example:
 - if you want us to prove its accuracy or the reason for processing it;
 - where our use of the data is unlawful, but you do not want us to erase it.
 - 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.
 - Where you have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.
- **Right to data portability.** This enables you to request the transfer of your information to another party. You can exercise this right within MyArgentis via the My Downloads area under the 'Me' menu. Here you can request a download of your MyArgentis data in a machine-readable format. Please 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.
- **Right to withdraw consent at any time.** This right only applies 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.

6.1. Exercising your rights.

If you wish to exercise any of the rights set out above, please contact us at DPO@argentis.co.uk or support@moneyinfo.com.

We may need to request specific information from you to help confirm your identity. This is a security measure to ensure that personal information 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.

In normal circumstances, we have one month to respond to you. If your request is complicated or you have requested a large amount of data, we are entitled to extend the deadline for

responding to you by up to three months. We will let you know if we need to extend the deadline.

6.2. You don't usually have to pay a fee to exercise your rights.

You are not required to pay any charge for exercising your rights. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

7. Your right to raise concerns or make a complaint.

If you have any concerns in connection with your data and its processing via MyArgentis or if you think any data held within MyArgentis may be inaccurate or incomplete then please contact, in the first instance, us as the Data Controller at DPO@argentis.co.uk.

You can also contact Moneyinfo limited as the Data Processor by email at support@moneyinfo.com, by telephone on 03303 600300 or in writing at Moneyinfo Limited, Forward House, 17 High Street, Henley-in-Arden, Warwickshire B95 5AA.

If you have a concern or would like to lodge a complaint against either us or Moneyinfo limited you may raise your concern with the Information Commissioner's Office (ICO). You may be eligible for compensation for damages caused if we breach of our responsibilities. For information on how to raise your concern with the ICO please see <https://ico.org.uk/concerns/>.

Version 2025.10 | Last Updated: October 2025.