

PIA First: Summary of Regulation Status

PIA First Ltd (“PIA”, “Signal Centre”) is authorised and regulated by the Financial Conduct Authority (FCA). You can verify its regulatory status [here](#). The FCA Reference Number (FRN) for PIA First Ltd is 787261.

PIA First Ltd is registered in England & Wales under company number 07428345. The Registered Office is located at 3rd Floor, 86-90 Paul Street, London, England, EC2A 4NE. The VAT number for PIA First Ltd is 153 646014.

Scope of Regulated Activities

The scope of regulated advice in the UK changed, [when relevant adjustments made to the UK Regulated Activities Order](#) went live in the UK on the 3rd of January 2018.

The application of the change is summarised in the following table, extracted from the FCA page linked to above:

Table 1: Summary of the changes from 3 January 2018

Firm Type	Effect of changes on regulatory perimeter
Regulated firm <i>with</i> ‘advising on investments’ and/or ‘agreeing to advise on investments’ permission(s) <i>and</i> another permission.	These firms can provide advice on financial products and services without the advising permission(s). However, they will need to keep the advising permission(s) if they provide personal recommendations.
Regulated firm <i>without</i> the ‘advising on investments’ or ‘agreeing to advise on investments’ or ‘agreeing to advise on investments’ permission(s) but <i>with</i> another permission.	These firms can provide advice on financial products and services without the advising permission. However, they will still need to seek the advising permission(s) if they want to provide personal recommendations.
Regulated firm <i>with</i> ‘advising on investments’ and/or ‘agreeing to advise on investments’ permission but <i>without</i> another permission.	No change - the scope of regulated advice for which permission is required remains the same.
Unregulated firms and individuals.	No change - these firms and individuals will not be able to provide any form of regulated advice.

‘Regulated Advice’ in MiFID is referred to as ‘Investment Advice’.

[‘Investment Advice’](#) in MiFID, and in-turn in the UK, is defined as a personal recommendation. In summary, at a top level, this is where advice regarding a designated investment is held out as being suitable for the recipient of the advice.

As per Table 1 above, Regulated Advice in the UK is wider, depending on the circumstance of the firm giving the advice, and the way the advice is held out.

Buy/Sell/Hold trading signals that are not held out as being suitable nor a recommendation for the recipient and are distributed to many subscribing clients irrespective, are not personal recommendations and do not therefore constitute ‘investment advice’. However, Buy/Sell/Hold trading signals fall under the wider UK definition of Regulated Advice, which includes, but is wider than, the MiFID definition of ‘investment advice’.

Regulation Status of PIA First

[PIA-First Limited is FCA authorised](#) as an Article 2 MiFID Exempt Firm.

Being Article 2 MiFID Exempt means the FCA recognises that the activity the firm conducts is not MiFID activity. As above, this is because Buy/Sell/Hold trading signals that are not provided as being suitable/personal recommendations, are not investment advice in MiFID, therefore a UK/EU firm only conducting such activity cannot be a MiFID firm, as the activity is not MiFID activity.

PIA-First Limited (“PIA”, “Signal Centre”) only has the ‘advising on investments’ permission. Therefore, PIA falls under the third type of firm listed in Table 1 above. This means the Buy/Sell/Hold signals of PIA are regulated activity of PIA in the UK.

What PIA’s regulation means for our clients

A frequently asked question is: *“Is my firm advising our clients if we provide the signals from PIA / Signal Centre to our clients?”*

Where PIA provides its trading signals to other firms

Where PIA provides its trading signals to a UK FCA authorised investment firm, and that firm has another FCA investment permission, and that firm provides the signals to its clients on a generic non-suitable, non-recommended basis; as per the first and second types in Table 1, as above, the UK firm is not conducting regulated advice, as the advice falls outside the FCA’s redefined ‘regulated advice’ perimeter due to the circumstances of the FCA firm and the way the trading signals are being provided to the end clients.

Where PIA provides its trading signals to an EU authorised investment firm or unauthorised EU firm, and that firm provides the signals to its clients on a generic non-suitable, non-recommended basis, as above, the EU firm is not conducting regulated advice as the advice does not constitute ‘investment advice’ as defined in MiFID and is therefore not regulated activity, unless the given EU state’s regulator has redefined advice such that it is caught as regulated activity in the given EU state.

Where PIA provides its trading signals to a non-UK, non-EU firm, and that firm provides the signals to its clients on a generic non-suitable, non-recommended basis, the rules permitting or not permitting the activity would depend on the financial services rules in the specific country.

Cross border services

As the service PIA provides is not MiFID activity, the UK’s loss of MiFID EU cross border passporting, due to Brexit, does not affect PIA regarding the provision, on a non-suitable/non-recommended basis, of its trading signals to EU persons/firms, provided the given EU territory has not redefined advice like the UK, as the trading signals are not ‘investment advice’ under MiFID, as above.

For the provision of the signals to non-EU countries, it would depend on the financial services regulations in the specific territory.

Disclaimer

PIA First Ltd (“PIA”, “Signal Centre”) is authorised and regulated by the Financial Conduct Authority (FCA) and operates within the scope of its regulatory requirements. However, the provision of trading signals is subject to a different set of rules and regulations, which are outlined in this document. Clients and users of PIA's services are advised to consult with their own legal and regulatory advisors to ensure they are compliant with all relevant laws and regulations. PIA does not accept any liability for any loss or damage resulting from reliance on the information contained in this document.