



CURTIS BANKS GROUP

Data Retention For Clients, Attorneys,
Advisers & Individual Property Tenants



WHAT PERSONAL INFORMATION WE USE AND HOW LONG WE KEEP IT

This document is to broadly define how long the Data Controllers* within the Curtis Banks group of companies will retain personal data under the General Data Protection Regulations (GDPR).

The nature of pensions is that data will usually be held for an extensive period of time given the long-term nature of the contract in place. The retention details set out below are the timeframes for which we would hold data, as standard. Please note that we may keep your personal data for a longer period of time in the event of ongoing complaints, legal claims or where required to do so by law.

If you have concerns about how we process your personal data, you can contact the Information Commissioner's Office on 0303 123 1113 or visit their website at www.ico.org.uk/concerns.

Type of Data	Retention Period
Personal Data and Special Category Data received via paper, electronic means (e.g. email or online application) or verbally	<p>7 years from the date of the last activity. Examples of last activity include, but are not limited to:</p> <ul style="list-style-type: none"> • When a transfer out to a new scheme has finalised • When a plan depletion is finalised (such as via flexi-access drawdown) • When a plan is formally closed after being considered bankrupt. A bankrupt plan no longer contains any assets (i.e. cash, equities, commercial property etc.) with an associated value and is not likely to realise a value in the future • From the date a complaint/legal matter is closed if this is later than the plan closing date • Where you are a property tenant, the data will be retained for 7 years from the date of the last activity on the SIPP that held the property you leased. This means your data may be held for longer than 7 years so we can maintain a full record for an active or recently closed SIPP or SSAS
Personal data processed for regulatory returns (e.g. to the PRA or the FCA)	Indefinitely with the exception of the HMRC Relief At Source Annual Information Return, which will be retained for 7 years
Personal Data or Special Category Data where you did not proceed with establishing a SIPP/SSAS contract with the group (known as a 'Prospect' record)	<p>6 months from the date of the last activity. Examples of last activity include, but are not limited to:</p> <ul style="list-style-type: none"> • When we returned an application to you as it was no longer proceeding • When we generated a key features illustration for you • If initial due diligence is required on a SSAS prior to transfer-in, 6 months from the date Curtis Banks issues you with confirmation (by letter, telephone or electronic means) that the we are not willing to proceed with the transfer

*Data Controllers within the group include Curtis Banks Group Plc, Curtis Banks Limited, Curtis Banks Investment Management Limited, Suffolk Life Annuities Limited, Suffolk Life Pensions Limited, SLA Property Company Limited and Suffolk Life Group Limited. A full list of the Data Controllers within the group can be found on the Information Commissioner's Office website at <https://ico.org.uk/esdwebpages/search>.