

GENERAL DATA PROTECTION REGULATION GDPR STATEMENT

JULY 2018



Background

The Curtis Banks Group and subsidiaries administer SIPP, SSAS and similar self-invested products in the United Kingdom. The Group takes its personal information protection and data security responsibilities seriously; we are committed to protecting and enhancing the rights given to all data subjects for which we obtain, process and protect data in accordance with the General Data Protection Regulation (GDPR).

Summary

The Curtis Banks Group welcomes the implementation of GDPR.

Under GDPR, the Curtis Banks Group continues to be both a Data Controller and Data Processor of personal data - this includes both personally identifiable information and special category information which is collected in certain specific circumstances.

We continue to review the feedback and Individual Rights requests received alongside all the relevant documentation we have in place. The documentation sets out our obligations, the Individual Rights and the data stored, in respect of our data subjects.

Assessment

The Curtis Banks Group collects, processes and uses only the minimum personal data in order to perform its contractual obligations and in accordance with regulatory and compliance requirements for the business activities we undertake. Data may also be shared within the Curtis Banks Group to fulfil our contractual obligations, and externally to fulfil additional contractual and regulatory obligations.

In accordance with GDPR, the Data Protection Officer (DPO) has overall responsibility to ensure ongoing adherence of GDPR within the Curtis Banks Group, alongside the Risk & Compliance function.

Curtis Banks Pensions is a trading name of Suffolk Life Pensions Limited. Suffolk Life Pensions Limited is a company registered in England & Wales (registered number 1180742) with its registered address at 153 Princes Street, Ipswich, Suffolk IP1 1QJ. Suffolk Life Pensions Limited is authorised and regulated by the Financial Conduct Authority (number 116298). Suffolk Life Annuities Limited is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority (number 110468) and is registered in England & Wales (number 1011674) with its registered address at 153 Princes Street, Ipswich, Suffolk IP1 1QJ.

Curtis Banks Limited (registered number 6758825) and Colston Trustees Limited (registered number 6867955) are companies registered in England & Wales with their registered addresses at 3 Temple Quay, Bristol BS1 6DZ. Curtis Banks Limited is authorised and regulated by the Financial Conduct Authority. SL102.201804

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Commitment

With the requirements of GDPR and under our ongoing commitment to collect, hold and process your personal data responsibly we are committed to:

- Processing your data in accordance with the legal basis for which the data was originally collected;
- Ensuring that the personal data we hold is accurate and that there are processes in place to rectify any inaccuracies promptly;
- Maintaining robust security systems and controls to protect your personal data against unauthorised access, processing, loss or accidental destruction;
- Maintaining robust governance, operational procedures and ongoing employee training to maintain compliance with all data protection legislation.

Activity

- The Curtis Banks Group has amended its associated policies, controls and procedures as necessary, in order to fully comply with GDPR.
- The Curtis Banks Group have reviewed all of its own and third party contracts and will, where necessary, amend client and other third party contracts to ensure compliance with GDPR and the business activities of the group.
- The Curtis Banks Group carried out a Data Protection Impact Assessment (DPIA), and will undertake future assessments when there are significant changes to any of our products, services, processes etc.
- The Curtis Banks Group wrote to data subjects (where relevant) to explain more about GDPR and to provide updated Privacy Information Notices (PIN's).
- The Curtis Banks Group have supplemented existing training modules with GDPR specific content, encouraging employees to embrace the requirements and practises required under GDPR.
- The Curtis Banks Group will actively review our framework to ensure our GDPR approach is robust and fit for purpose.