

# GENERAL DATA PROTECTION REGULATION UK-GDPR STATEMENT

APRIL 2021



## Background

*The Curtis Banks Group 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 United Kingdom General Data Protection Regulation (UK-GDPR) and the Data Protection Act (DPA)*

## Summary

Under UK-GDPR/DPA, 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 UK-GDPR/DPA, the Data Protection Officer (DPO) has overall responsibility to ensure on adherence of UK-GDPR/DPA within the Curtis Banks Group, alongside the Risk & Compliance function.

Curtis Banks Group plc (registered number 07934492) and Curtis Banks Limited (registered number 06758825) 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 (number 492502). 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) and is authorised and regulated by the Financial Conduct Authority (number 116298). Suffolk Life Annuities Limited is a company registered in England & Wales (registered number 1011674) and is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority (number 110468). The registered address of both companies is 153 Princes Street, Ipswich, Suffolk IP1 1QJ. Tel: 0117 910 7910 Fax: 0117 929 2514. Call charges will vary. We may record and monitor calls. If you're contacting us by email, please remember not to send any personal, financial or banking information because email is not a secure method of communication. SL102.202104 April 2021

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## Commitment

In line with the requirements of UK-GDPR/DPA 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 and all its associated policies, controls and procedures are fully comply with UK-GDPR.
- The Curtis Banks Group has reviewed all of its own and third party contracts and will (where applicable), amend client and other third party contracts to ensure compliance with UK-GDPR and the business activities of the group.
- The Curtis Banks Group carried will undertake Data Protection Impact Assessment (DPIA), where there are any significant changes to any of our products, services or processes etc.
- The Curtis Banks Group will write to data subjects (where applicable) to explain more about GDPR and to provide updated Privacy Information Notices (PINs).
- The Curtis Banks Group implements UK-GDPR specific content within existing internal training modules, to ensure employees fully understand the requirements and practices required under UK-GDPR.
- The Curtis Banks Group will actively review it's operational framework to ensure the Group's UK-GDPR approach is robust and fit for purpose.