

CURTIS BANKS LIMITED

Privacy Information Notice



Contents

Section	Page
1 Who we are	3
2 Why we need to collect, use and process personal information	3
3 The information we may collect, hold and process about you	3
4 How we use your personal information	4
5 How we collect information	4
6 Disclosure of your information	4
7 Data retention	4
8 Automated decisions	4
9 Mobile data	4
10 Marketing	5
11 Transfers outside of the European Economic Area	5
12 Security and storage of information	5
13 Cookies (small text files)	5
14 Your information and your rights	5
15 Other sites and social media	6
16 Electronic mail containing personal information	6
17 Changes to our Privacy Information Notice	6
18 Contact us	6

This Privacy Information Notice describes how the Curtis Banks Group will collect, use and protect your personal information. It applies to any website, applications and products or services offered by the Curtis Banks Group and referred to in this Privacy Information Notice.

1 Who we are

Curtis Banks Limited of 3 Temple Quay, Bristol, BS1 6DZ is the Data Controller.

Curtis Banks Limited is part of Curtis Banks Group plc which also includes Suffolk Life Annuities Limited and Suffolk Life Pensions Limited and associated companies ("the Curtis Banks Group"), any of whom may act as Data Processors.

The Data Protection Officer (DPO) for the Curtis Banks Group is Ian Stone (DPO@curtisbanks.co.uk or Tel 0117 910 7910).

This document shall be governed by and construed in accordance with the laws of England & Wales. It is based on our current understanding of regulations and can be subject to change as tax laws and legislation may change over time.

Expression What it means in this document

agent	a person or organisation who you have appointed to act on your behalf in relation to a product or service offered by Curtis Banks Group (e.g. your financial advisers or investment managers or attorneys).
Data Controller	the person (or business) who determines the purposes and means of processing personal information.
Data Processor	the person (or business) responsible for processing personal data on behalf of a Data Controller.
EEA	European Economic Area which is made up of EU countries plus Norway, Iceland and Liechtenstein.
we/us/our	Curtis Banks Limited.

2 Why we need to collect, use and process personal information

We collect personal information from you in order to perform our contractual obligations when you apply for any of our products or services.

When you complete an application for any of our products or services you understand that we will be processing your personal data for the purpose set out above.

When we need to collect, use and process sensitive personal information we will obtain your express consent at the specific time that we need it.

3 The information we may collect, hold and process about you

- Title;
- Full name;
- Permanent residential address and previous address (if you have lived there less than three years);
- Telephone contact number(s);
- Email address;
- Date of birth;
- National Insurance Number;
- Nationality;
- Country of residence;
- Expected retirement age;
- Whether you are married or in a registered civil partnership;
- Spouse's or registered civil partner's date of birth;
- Employment status;
- Employer's name and address;
- Details of any pension protection and contribution restrictions;
- Financial information about you;
- Your personal bank details;
- Agent details;
- Supporting information to verify your identity and address;
- Outcome of identity searches and anti-money laundering due diligence;
- All communications to and from you by telephone, email, post or otherwise.

We will also collect details of beneficiaries on your death on an expression of wishes form. We will only hold this data for the purpose of assisting in determining how benefits may be payable on your death.

We may, in certain circumstances, need to collect, process and hold sensitive personal information including any physical or mental health or condition of any nature or your religious persuasion. Due to the nature of this personal information we will always seek your consent prior to requesting it for processing.

4 How we use your personal information

- To enable you to obtain a projection or illustration;
- To process your application for the requested products or services;
- To administer the product or service provided including the payment of benefits;
- To comply with legal or regulatory requirements;
- For the detection, prevention and investigation of illegal or prohibited criminal activities and in the protection of our legal rights (including liaison with regulators and law enforcement agencies);
- To provide you with access to applications in relation to the products or services you have requested;
- To notify you about changes to our products or services;
- To administer the website and secure portals and to carry out internal benchmark testing and systems monitoring (e.g. statistical and data analysis, troubleshooting faults or issues, service monitoring and for survey purposes), in order to improve the use, presentation, performance and security of the services;
- For market research, statistical analysis, customer profiling and in the development of our products and services; and
- To send you details by post, email, telephone or any other electronic means, of applications, products and services we supply which we believe may be of interest to you, but only if you have given us prior consent (this may include sending your details to third parties who may provide some services on our behalf).

5 How we collect information

You may give us information by filling in forms (in paper or on our website) or by corresponding with us by:

- Phone;
- Email;
- Post; or
- by any other electronic means.

This includes information you provide when you:

- Register to use our secure portal;
- Search our website;
- Apply for products or services; or
- Enter a promotion and/or participate in a survey or any other interaction with our website (including occasions when you report a problem with the websites).

We may also receive personal information from:

- Third parties who we work closely with and who are entitled to share information (e.g. credit agencies, search information providers, business partners, banking and related service providers, analytics providers, public sources or any other service providers), but in each case, as permitted by applicable law; and
- Third parties with whom we have contracted to purchase their business or assets.

Each time you visit the Curtis Banks Group websites we may automatically collect the following information:

- Technical information, including the Internet Protocol (IP) address used to connect your computer to the internet, your login information, browser type and version, time zone settings, browser plug-in types and versions, operating systems and platforms, etc.; and
- Information about your visit, including the full Uniform Resource Locators (URL) of the internet sites you came through to our websites and which pages you visited (including date and time); page response times; download errors; length of visits to certain pages; page interaction information; methods used to browse away from the page.

6 Disclosure of your information

We may share your personal data (including storage and transfer of data) with:

- Any members of the Curtis Banks Group for the purposes set out in this Privacy Information Notice;
- **Agents** selected by you and for whom you have given prior consent for us to share personal information;
- Your co-trustees and/or co-owners of your pension scheme investments;
- Any third party in order to meet our legal and regulatory obligations, including statutory or regulatory bodies, law enforcement agencies, credit reference agencies and company auditors;
- Our service providers and agents (including their sub-contractors) or third parties who process information on our behalf in relation to, for example, third parties to whom we outsource any aspect of pension administration, banks for processing payments, printing services, bulk communication purposes and internet services;
- Any third party in the context of actual or threatened legal proceedings provided we can do so lawfully; and
- Third parties to whom we sell or negotiate to sell our business or assets.

7 Data retention

We may retain information about you:

- At the end of your contract;
- After the winding up and dissolution of your trust (in relation to small self-administered schemes (SSAS) only);
- Where your application is declined; or
- Where you decide not to proceed.

This information will only be held for as long as is necessary to meet any legal, regulatory or fraud prevention requirements and for our lawful business processing. We regularly review our records to ensure that we only retain your personal information for as long as is necessary for the purposes set out in this Privacy Information Notice.

Please note: where we no longer need your personal information, we will dispose of it in a secure manner (without further notice to you). You can find more information in our Retention Policy, which can be found on our website.

8 Automated decisions

We may use your personal data to undertake automated online identity checks and in the detection, prevention and investigation of illegal or prohibited criminal activities.

9 Mobile data

We may obtain information through mobile applications that we may offer and you or your agents use to access our websites, applications and services. Mobile applications for this purpose may be provided by us or third parties. Where mobile applications are provided by a third party, you must read that third party's own privacy information notice in relation to that application. We are not responsible for third party mobile applications and their use of your personal information.

10 Marketing

From time to time, where you have provided consent, we may use your personal information to contact you by telephone, post, email or by any other electronic means, with details about our applications, products and services, which we feel may be of interest to you.

11 Transfers outside of the European Economic Area

The data that we collect from you may be transferred to, and stored at a destination outside the EEA. It may also be processed by our service providers (and their employees) operating outside the EEA.

We take steps to ensure that in the event that your information is transferred outside of the EEA by our service providers, appropriate measures and controls are in place to protect that information in accordance with applicable data protection laws and regulations in the UK.

12 Security and storage of information

The security and storage of your personal information is very important to us.

The personal information we collect from you is stored by us on secure servers, protected through a combination of physical and electronic access controls, firewall technology and other security measures. In addition, when we create payment instructions and pass them to our banking partners, they will be encrypted using secure technology. We have put in place measures to guard against unauthorised or unlawful processing and against accidental loss, destruction or damage.

If you (or your agent) contacts us for details of your account, we will ask some questions to establish your (or your agent's) identity and will not disclose any personal and/or account information, under any circumstances, unless we are satisfied that you (or your agent) are who you claim to be.

Although we use market standard security software to protect your personal information, we cannot guarantee the security of your data transmitted by you or your agent to our websites, secure portals, applications or services; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

If we have given you (or you have chosen) a password to access certain areas of our websites, applications or services please keep this password safe. We will not share this password with anyone. If you believe your account has been compromised, please contact the Data Protection Officer immediately at DPO@curtisbanks.co.uk in order for us to take additional steps to protect your personal information as appropriate.

13 Cookies (small text files)

The Curtis Banks Group websites use cookies to distinguish you from other users of our websites to help us improve our applications and services.

For detailed information on the cookies we use and the purposes for which we use them, please see our Cookie Policy.

14 Your information and your rights

You have the following rights:

- To be informed about how we obtain and use your information;
- To ask for a copy of the information that we hold about you;
- To have your information rectified;
- To request us to restrict processing of your personal data;
- To request to have your information erased (Right to be forgotten);
- To object to the processing of your information (e.g. for direct marketing purposes);
- To have information you provided to us, returned to you or sent directly to another company, in a structured, commonly used and machine-readable format where technically feasible (Data Portability);
- Where the processing of your information is based on your consent, the right at any time to withdraw that consent;
- To object to any decisions based on the automated processing of your personal data, including profiling; and
- To lodge a complaint with the Information Commissioner's Office (ICO), the supervisory authority responsible for data protection matters.

You cannot opt out of receiving regulatory or legal information or updates (e.g. information about a change to our product terms and conditions).

If you withdraw your consent to the processing of your personal information or you ask for your information to be erased, we may not be able to provide you with access to all or parts of our website, applications, products or services.

If you would like to exercise any of your rights please contact clientrelations@curtisbanks.co.uk or the Data Protection Officer DPO@curtisbanks.co.uk.

15 Other sites and social media

If you follow a link from our websites, applications or services to another site or service, this Privacy Information Notice will no longer apply. We are not responsible for the information handling practices of third party sites or services and we encourage you to read the privacy information notices appearing on those sites or services.

16 Electronic mail containing personal information

You and your **agents** may, from time to time, send personal information to us electronically. We are not responsible for the way in which you or your **agent** handles personal information. Where possible, we insist that you or your **agent** communicate using either secure/encrypted email, through a secure portal or using encrypted files. Please refer to clause 12 of this Privacy Information Notice regarding the security of information not sent via secure means.

When we communicate personal information with you or your **agent** through electronic means we will ensure that it is done so securely using either encrypted files or secure messaging.

To access our secure portal, you are required to be a registered authorised user with a Username and Password in order for us to verify you as an authorised user.

17 Changes to our Privacy Information Notice

We may change, modify or adjust this Privacy Information Notice from time to time; however we will not reduce your rights under this Privacy Information Notice.

Any changes we may make to our Privacy Information Notice in the future will be found on our website www.curtisbanks.co.uk. Copies are also available from us by post. Please contact us if you require a copy.

18 Contact us

We take your privacy and protection of your personal information very seriously. If you have any questions, comments or queries about the way we are collecting or using your personal information please contact the Data Protection Officer at the Curtis Banks Group, Head Office, 3 Temple Quay, Bristol, BS1 6DZ or email us at DPO@curtisbanks.co.uk.

If you have a concern about the way in which we are collecting or using your personal information you may also contact the Information Commissioner's Office directly at <https://ico.org.uk/concerns/>.



Notes

Curtis Banks Limited,
3 Temple Quay,
Bristol, BS1 6DZ

T 0117 910 7910
F 0117 929 2514
curtisbanks.co.uk

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.

Curtis Banks Limited is a company registered in England & Wales (registered number 06758825) and is authorised and regulated by the Financial Conduct Authority (number 492502) with its registered address at 3 Temple Quay, Bristol BS1 6DZ. CBL PIN 0320 March 2020

