

CURTIS BANKS GROUP

Privacy Information Notice (for Advisers)

December 2022



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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 Pensions and Suffolk Life Annuities Limited of 153 Princes Street, Ipswich, IP1 1QJ, and Curtis Banks Limited of 3 Temple Quay, Bristol BS1 6DZ are the **Data Controllers**.

Curtis Banks Pensions is a trading name of Suffolk Life Pensions Limited.

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

The contact details for the Data Protection Officer (DPO) for the Curtis Banks Group are 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

Adviser	you, a person or organisation who is authorised and regulated by the FCA, appointed by your client to receive communications in relation to a product or service offered by the Curtis Banks Group and which may include giving instructions on your client's behalf on all matters concerning a product or service offered by the Curtis Banks Group including buying and selling investments.
Client	a person who has contracted with you to provide them with financial advisory services.
Data Controller	the person (or business) who determines the purposes and means of processing personal information.
Data Processor	the person (or business) who processes personal information 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 Group Plc.

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

We collect personal information from you for our legitimate interest in order for us to perform our contractual obligations when a **client** of yours applies for any of our products or services and appoints you as their **adviser** in that regard.

When your **client** (or you on their behalf) completes 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.

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

- Title;
- Full name;
- Telephone contact number(s);
- Email address;
- Financial Services Register reference number; and
- All communications to and from you by telephone, email, post or otherwise.

4 How we use your personal information

- To assist in the administration of the product or service provided to your clients;
- 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 review and analyse the number and type of products and services we provide to your clients;
- To periodically review your permissions as noted in the Financial Services Register;
- 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 and 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:

- Search our website;
- Apply for products or services on behalf of your client; 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 that 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;
- Any third party in order to meet our legal and regulatory obligations, including statutory or regulatory bodies, law enforcement 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 client's contract with us;
- Where your client's application is declined; or
- Where your client decides 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 Mobile data

We may obtain information through mobile applications that we may offer and you 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.

9 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.

10 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 your personal information in accordance with applicable data protection laws and regulations in the UK.

11 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 are 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 contact us for details of your client's account, we will ask some questions to establish your identity and link to your client's account. We will not disclose any personal and/or account information, under any circumstances regarding your client, unless we are satisfied that you 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 or your client's data transmitted by you 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.

12 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.

13 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; 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 we are not able to comply with your request we will confirm this to you along with confirmation of the lawful basis which we will rely on to continue processing your personal data.

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.

14 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.

15 Electronic mail containing personal information

You may, from time to time, send personal information about yourself or your client to us electronically. We are not responsible for the way in which you handle personal information. Where possible, we insist that you communicate using either secure/encrypted email, through a secure portal or using encrypted files. Please refer to clause 11 of this Privacy Information Notice regarding the security of information not sent via secure means.

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

16 Changes to our privacy 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 available from us by post. Please contact us if you require a copy.

17 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 Group plc,
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 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.
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