

Templemead Property Solutions Limited

Privacy Information Notice



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

1 Who we are

Templemead Property Solutions Ltd of 3 Temple Quay, Bristol BS1 6DZ is the Data Controller.

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

Our use of your personal data is subject to your instructions, relevant data protection legislation and our duty of confidentiality (further information of how we share your data is set out below).

The Data Protection Officer for the Curtis Banks Group can be contacted at DPO@curtisbanks.co.uk.

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 the 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 Pensions.

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

We will only collect the personal data necessary to allow us to undertake our instructions and in accordance with our agreed contractual terms and conditions. We will also ensure that we comply with our legal and regulatory obligations. We will only ask all our clients to share their personal data, or that belonging to a third party, if it is strictly needed and necessary for those purposes.

Please Note: we do not knowingly collect data relating to children.

It is important that this Privacy Information Notice is read together with any other privacy notice or policy information provided on specific occasions when we are collecting or processing personal data, so that you are fully aware of how and why we are using your data.

This Privacy Information Notice supplements any other notices, and is not intended to override them.

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

Personal Data, or personal information is any information about an individual from which that person can be identified (it does not include data where the identity has been removed).

Where we need to process personal data to carry out our instructions, we may process the following categories or types of personal data as appropriate for the instructions and the nature of the services we are delivering:

- Title;
- Full name;
- Permanent residential/commercial billing address or delivery address;
- Email address;
- Mobile/Landline telephone contact number(s);
- Date of birth;
- National Insurance Number;
- Identity verification information;
- Agents details;
- Bank account details;
- Business activities including information about you, your operations and business accounts.

For certain services or activities, and when required by law or with an individual's consent, we may also collect special categories of personal data (e.g. race or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; physical or mental health; genetic data; biometric data; sexual life or sexual orientation; and, criminal records).

We do not share sensitive personal data with any third parties without your express written consent.

Generally, we collect personal data direct from our clients via our standard instruction details forms, by email or phone or from a third party acting on the instructions of the relevant client.

4 How we use your personal information

We use personal information (data), for the following purposes:

Providing professional services

We provide professional property valuations and landlord & tenant services. Some of our services require us to process personal data in order to provide advice and to carry out instructions and deliverables (e.g. we need to use personal data to arrange for the inspection of a property).

Administering, managing and developing our business and services

We process personal data in order to run our business, including:

- Managing our relationship with clients;
- Developing our business and services (e.g. identifying client needs and improvements in service delivery);
- Maintaining and supporting IT systems and security of those systems;
- Hosting or facilitating the hosting of events;
- Administering and managing our website, systems and applications.
- Statistical analysis
- Audit and debt collection

Security, quality and risk management activities

We have robust security measures in place to protect the Curtis Banks Group and our Clients personal information data, which may involve detecting, investigating and resolving security threats. Personal data may be processed as part of the security monitoring that we undertake (e.g. automated scans to identify harmful emails).

We monitor the services provided to clients for quality purposes, which may involve processing personal data stored on the relevant client file. We also have policies and procedures in place to monitor the quality of our services and manage risks in relation to client engagements.

We collect and hold personal data as part of our client engagement and acceptance procedures, and as part of our client and engagement acceptance, we rely upon the policies and procedures operated by the Curtis Banks Group which searches using publicly available sources (e.g. internet searches and sanctions lists), to identify politically exposed persons (PEP's), and heightened risk individuals and organisations to check that there are no risk or issues that would prevent us from accepting an instruction (e.g. sanctions, criminal convictions (including in respect of Company Directors), conduct, or other reputational issues).

Provision of information about us and our range of services

With your consent we use personal data to provide information that we think will be of interest to you about us and our services (e.g. industry updates and insights, other services/products that may be relevant, and invites to events).

Complying with any requirement of law, regulation or a professional body of which we are a member

As with any provider of professional services, we are subject to legal, regulatory and professional obligations. We need to keep certain records that may contain personal data to demonstrate that our services are provided in compliance with our legal obligations.

5 How we share your data

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

- Our Employees, Agents or Consultants who we may select to undertake the relevant instructions.
- Third parties in order to meet our legal and regulatory obligations, including statutory or regulatory bodies, law enforcement agencies in the detection or prevention of unlawful acts, credit reference agencies and auditors.
- Our service providers and agents (including their sub-contractors) or third parties who process information on our behalf in relation to (e.g. payment processing and invoicing).
- Any third party in the context of actual or threatened legal proceedings provided we can do so lawfully.

Please Note: we do not share your personal data with any third parties for marketing purposes.

Group Companies

Templemead Property Solutions Limited is the only company in the Curtis Bank Group regulated by the RICS, and as such it is important that Templemead Property Solutions Limited and the other corporate entities within the Curtis Banks Group work separately.

Personal data will not be shared between Curtis Banks Group entities, other than where our service providers might act for us on instruction (see above). Any risks to the sharing or passing of data will be identified and mitigated by robust internal procedures and appropriate employee training.

6 How we collect, hold, maintain, store or retain your data

Different methods of collection can be used including;

- Publicly available sources such as Companies House or H M Land Registry.
- Automated technologies or interactions such as through our website which is collected automatically through the use of cookies or similar technologies.
- Direct Interactions, you may give us your identity, contact information and transaction details by filling in forms or corresponding with us by email, post or by telephone.

We retain the personal data processed by us for as long as is considered necessary for the purpose for which it was collected (including as required by applicable law or regulation).

In the absence of specific legal, regulatory or contractual requirements, our baseline retention period for records and other documentary evidence created in the provision of services is 15 years.

Where we no longer need your personal information, we will dispose of it in a secure manner (without further notice to you) but always in accordance with our Management Information and Data Retention Policy.

7 Security of your data

We have implemented procedures to protect your personal details and monitor our performance regularly. All information you provide to us is stored on secure servers to guard against unauthorised or unlawful processing and against accidental loss, destruction or damage.

If you (or any Agent acting on your behalf) contacts us for details of your file or information on our services, we will ask some questions to establish you (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 and will take all reasonable precautions to protect information sent electronically, we do not warrant, represent or guarantee the security of your personal information which is transmitted via the internet to our websites, applications or services or to other websites via a similar connection.

8 Data and your rights

If you are based within the EEA you have the following rights:

- To be informed on 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 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.
- To lodge a complaint with the Information Commissioner's Office (ICO), the supervisory authority responsible for data protection matters.

Please Note: you cannot opt out of receiving regulatory or legal information or updates (e.g. information about a change in our standard terms and conditions).

If you fail to provide personal data or where you withdraw consent to its use

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract or supply the service we have or are trying to enter with you. In this case, we may have to cancel a service you have with us, but we will notify you if this is the case at the time.

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 a comprehensive or full service in accordance with your instructions. We will notify you if this is the case at the time.

9 Changes to our Privacy Information Notice or Policy

We reserve the right to change, modify or adjust this notice from time to time; however we will not reduce your rights under this Privacy Notice.

Any changes we may make to our notice in the future will be updated on our website.



Notes



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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