

CURTIS BANKS GROUP

(ON BEHALF OF AVIVA LIFE & PENSIONS UK LTD)

Privacy Information Notice (for Third Parties)

December 2023



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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

Aviva Life & Pensions UK Ltd is the **Data Controller** who has ultimate responsibility for this personal information.

Curtis Banks Limited, of 3 Temple Quay, Bristol BS1 6DZ, is part of Curtis Banks Group Plc which also includes Suffolk Life Annuities Limited, Suffolk Life Pensions Limited, SLA Property Company Limited and associated companies ("the Curtis Banks Group"), any of whom may act as **Data Processors**.

Curtis Banks Limited provide third party administration for Aviva Life & Pensions UK Ltd as the insurer of this product.

The Data Protection Officer (DPO) for Aviva Life & Pensions UK Ltd can be contacted at Data Protection Officer, Level 4, Pitheavlis, Perth, PH2 0NH.

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

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

| | |
|-------------------|--|
| Client | a person who has entered or intends to enter into a contract for a product or service offered by a member of the Curtis Banks Group. |
| 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 . |
| Data Subject | you, a living person who is the subject of personal data and to whom personal data relates. |
| EEA | European Economic Area which is made up of EU countries plus Norway, Iceland and Liechtenstein. |
| Agent* | you, a person appointed to act on behalf of another in relation to a product or service offered by the Curtis Banks Group. |
| Attorney* | you, a person who has the authority to act for another person in specified or all legal or financial matters. |
| Executor* | you, the individual chosen to act as the administrator of a deceased person's estate during the probate process. |
| Lease Guarantor* | you, a person who signed their name to a rental agreement and agrees to pay if the tenant of a property is not able to pay the rent. |
| Legal Guardian* | you, a person lawfully invested with the power, and charged with the obligation, of taking care of and managing the property and rights of a person who, because of age, understanding, or self-control, is considered incapable of administering their own affairs. |
| Property Nominee* | you, a person who is the legal owner of and/or has the benefits of ownership (such as receipt of income) of a property. |
| Third Party | you, a person who makes contributions or undertakes or is appointed to carry out a function or service for a client . This definition includes, but is not limited to, all third parties noted within this glossary. |
| We/Us/Our | Curtis Banks Group Plc. |

* Together referred to as "Third Party" in this Privacy Information Notice.

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

We collect personal information from you for our legitimate interest in order to perform our contractual obligations when a client applies for any of our products and/or services and you agree or are required to assist in the administration or performance of any element of that product and/or service.

When you are required to assist in the administration or performance of any element of any of our products and/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;
- Date of birth;
- National Insurance Number;
- Documentation to verify your identity and address;
- Your bank details;
- Address;
- Employer details;
- Recognised body reference number (where applicable);

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 products and/or services provided to a client;
- 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 periodically review your permissions as noted in a recognised body register (where applicable);
- 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; 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; 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, 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 and sensitive 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 or any other 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 or any other 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 or an existing client's contract with us;
- Where your or a client's application is declined; or
- Where you or a 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.

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 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 contact us regarding a client's account, we will ask some questions to establish your identity and link to a client's account. We will not disclose any personal and/or account information, under any circumstances regarding the client, unless we are satisfied that you are who you claim to be and it is relevant for us to do so.

Although we use market standard security software to protect your personal information, we cannot guarantee the security of your 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.

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);
- 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 on which we will rely 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.

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 may, from time to time, send personal information about yourself or a 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 12 of this Privacy Information Notice regarding the security of information not sent via secure means.

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

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/>.

19 Accessing our services

If you experience difficulties accessing any of our services due to personal circumstances, we may be able to make some adjustments to help you. Please contact our SIPP Support Team on 01473 296969 or sippupportteam@curtisbanks.co.uk to discuss any support adjustments that may be available to you.



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. SL237.202312 December 2023

