

CURTIS BANKS GROUP

Privacy Information Notice (for Employees)

June 2023



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 your personal information	4
6 Disclosure of your information	4
7 Data retention	4
8 Automated decisions	4
9 Transfers outside of the European Economic Area	4
10 Security and storage of information	5
11 Your information and your rights	5
12 Changes to our Privacy Information Notice	5
13 Contact us	5
14 Accessing our services	5

This Privacy Information Notice describes how the Curtis Banks Group will collect, use and protect your personal information in order to manage our employment relationship with you. This notice applies to potential, current and former employees.

1 Who we are

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

Suffolk Life Pensions Limited also trades as Curtis Banks Pensions.

Curtis Banks Limited and Suffolk Life Pensions Limited are part of Curtis Banks Group plc which also includes Suffolk Life Annuities Limited, 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

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 Group Plc.

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

We need to use and process personal data in order to enter into an employment contract with you and to meet our obligations under your employment contract. For example, we need to process your data to provide you with an employment contract, to pay you in accordance with your employment contract and to administer any benefits you may have.

In some cases, we need to process data to ensure that we are complying with our legal obligations. For example, we are required to check an employee's entitlement to work in the UK, to deduct tax, to comply with health and safety laws and to enable employees to take periods of leave to which they are entitled. For certain positions, it is necessary to carry out criminal record checks to ensure that individuals are permitted to undertake the role in question.

In other cases, we have a legitimate interest in processing personal data before, during and after the end of our employment relationship.

We process some special categories of personal data, such as information about health or medical conditions, to carry out employment law obligations (such as those in relation to employees with disabilities and for health and safety purposes).

Where we process other special categories of personal data, such as information about ethnic origin, sexual orientation, health or religion or belief, this is done for the purposes of equal opportunities monitoring. Data we use for these purposes is anonymised or is collected with your express consent, which can be withdrawn at any time. You are entirely free to decide whether or not to provide such data and there are no consequences of failing to do so.

When you sign a contract of employment you understand that we will be processing your personal data under the bases above.

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

- Your name, address and contact details, including email address and telephone number, date of birth and gender;
- The terms and conditions of your employment;
- Details of your qualifications, skills, experience and employment history, including start and end dates, with previous employers and with the organisation;
- Information about your remuneration, including entitlement to benefits such as pensions or insurance cover;
- Details of your bank account and National Insurance Number;
- Information about your marital status;
- Information about your nationality and entitlement to work in the UK;
- Details of your schedule (days of work and working hours) and attendance at work;
- Details of periods of leave taken by you, including holiday, sickness absence, family leave and sabbaticals, and the reasons for the leave;
- Details of any disciplinary or grievance procedures in which you have been involved, including any warnings issued to you and related correspondence;
- Assessments of your performance, including appraisals, performance reviews and ratings, training you have participated in, performance improvement plans and related correspondence;
- Information about medical or health conditions, including whether or not you have a disability for which we need to make reasonable adjustments;
- Details of trade union membership;
- Information about your criminal record;
- Biometric data if you are provided with a corporate mobile phone; and
- Equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health and religion or belief.

We will also collect details of your emergency/next of kin contact details and beneficiaries on your death. We will only hold this data in order to contact your next of kin in an emergency and for the purpose of assisting in determining how benefits may be payable on your death.

4 How we use your personal information

- To run recruitment and promotion processes;
- To maintain accurate and up-to-date employment records and contact details (including details of who to contact in the event of an emergency), and records of your contractual and statutory rights;
- To operate and keep a record of disciplinary and grievance processes, to ensure acceptable conduct within the workplace;
- To operate and keep a record of your performance and related processes, to plan for career development and training, and for succession planning and staff management purposes;
- To operate and keep a record of absence and absence management procedures, to allow effective staff management and ensure that employees are receiving the pay or other benefits to which they are entitled;
- To obtain occupational health advice, to ensure that we comply with duties in relation to individuals with disabilities and to meet our obligations under health and safety law;
- To operate and keep a record of other types of leave (including maternity, paternity, adoption, parental and shared parental leave), to allow effective staff management, to ensure that we comply with our duties in relation to leave entitlement, and to ensure that employees are receiving the pay or other benefits to which they are entitled;
- To operate the benefit schemes that may be provided to you;
- To ensure effective general Human Resource (HR) and business administration;
- To provide references on request for current or former employees;
- To respond to and defend against legal claims;
- To comply with accounting and tax rules;
- To comply with regulations and any specific record retention laws;
- To maintain and promote equality in the workplace;
- To conduct employee surveys and administer employee recognition programs; and
- To carry out the business functions for the products and services we provide.

5 How we collect your personal information

You may give us information by corresponding with us by:

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

We may also collect personal information in the following ways:

- Through application forms or CVs;
- Obtained from your passport or other identity documents such as your driving license;
- From forms you have completed at the start of and during your employment (e.g. next of kin details);
- From correspondence with you when you contact the HR department;
- Through interviews, meetings or other assessments;
- When we receive your personal information from third parties e.g. from references from your previous employer(s), employment background check providers, information from credit reference agencies and information from criminal record checks permitted by law; and
- All communication to and from you (whether by email, phone, post or other means) when you undertake all duties under your contract of employment and job role.

6 Disclosure of your information

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

- Internally with any member of the Curtis Banks Group for the purposes set out in this Privacy Information Notice, including with members of the HR team, payroll team, your line manager, managers in the business area in which you work and IT staff if access to the data is necessary for the performance of their roles;
- With third parties that process data on our behalf, for example, in connection with payroll and the provision of benefits, pension scheme providers or operators of employee share schemes (including SAYE) etc.;
- 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; and
- Where we are under a legal obligation to do so, for example where we are required to share information under statute, to prevent fraud and other criminal offences or because of a court order (e.g. HMRC, police).
- 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 employment contract (resignation, retirement, redundancy or termination); or
- If your application for employment is unsuccessful.

After the end of your employment contract, information will only be held for 15 years from that date or last activity or as long as is necessary to meet any legal, regulatory or fraud prevention requirements and for our lawful business processing. We will regularly review our records to ensure that we only retain your personal details for as long as is necessary for the purposes set out above.

Please note: where we no longer need your personal information, we will dispose of it in a secure manner (without further notice to you).

We will retain all communication to and from you (whether by email, phone, post or other means) when you undertake all duties under your contract of employment and job role in relation to our business activities in line with the Privacy Information Notice for customers.

If your application for employment is unsuccessful, we will hold your data on file for 6 months after the relevant recruitment process.

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 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.

10 Security and storage of information

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. Nevertheless, such security measures cannot prevent all loss, misuses or alteration of personal information, therefore we are not responsible for any damages or liabilities relating to any such incidents to the fullest extent permitted by law.

Where required under law, we will notify you of any such loss, misuse or alteration of personal information that may affect you so that you can take the appropriate actions for the due protection of your rights.

If you believe your personal information has been compromised, please contact the Data Protection Officer (DPO) immediately at DPO@curtisbanks.co.uk in order for us to take additional steps to protect your personal information as appropriate.

11 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;
- 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.

If you would like to exercise any of your rights please contact HR@suffolklife.co.uk for Ipswich based employees and HR@curtisbanks.co.uk for Bristol/Dundee employees, or your Data Protection Officer DPO@curtisbanks.co.uk.

12 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 HR@suffolklife.co.uk if you require a copy for Ipswich based employees and HR@curtisbanks.co.uk for Bristol/Dundee employees, if you require a copy.

13 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/>.

14 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 sippsupportteam@curtisbanks.co.uk to discuss any support adjustments that may be available to you.

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.
SL106.202306 June 2023

