

CURTIS BANKS GROUP

Privacy Information Notice (for Shareholders)
June 2023



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This Privacy Information Notice describes how Curtis Banks Group plc will collect, use and protect your personal information as an individual shareholder.

1 Who we are

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

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

Agent	you, a person appointed to act on behalf of another in relation to an individual shareholding in Curtis Banks Group plc.
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.

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

We collect personal information from you (or via your **agent**) for our legitimate interest in order to meet our legal obligations under the Companies Act 2006, as amended from time to time, and under the United Kingdom Listing Authority and/or London Stock Exchange.

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

- Title;
- Full name;
- Telephone contact number(s);
- Email address;
- Permanent residential address;
- The votes you cast;
- Shareholder reference number attributed to you by us; and
- All communications to and from you by telephone, email, post or otherwise.

4 How we use your personal information

- To compile and keep up to date our records of shareholders;
- To fulfil our legal obligations;
- To notify you of shareholder information and related communications;
- To provide services of benefit to shareholders such as dealing services etc.;
- 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 process the shareholder rights you exercise;
- To carry out research and statistical analysis in order to improve the use, presentation, performance and security of the services we offer you; 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).

We may appoint a third party to undertake any of the above services (for example, Computershare Investor Services plc, our Registrar (Computershare)) and who may process your personal information on our behalf (**Data Processor**).

5 How we collect information

You or your **agent** may give us information by filling in forms (in paper or electronically) or by corresponding with us by:

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

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;
- Computershare or any other company who we appoint to administer our share register;
- Any third party in order to meet our legal and regulatory obligations, including statutory or regulatory bodies, the London Stock Exchange, 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, 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 only 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 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.

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 that information in accordance with applicable data protection laws and regulations in the UK.

10 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. We have put in place measures to guard against unauthorised or unlawful processing and against accidental loss, destruction or damage.

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; 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. notices of meetings).

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.

12 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.

13 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 secure/encrypted email. Please refer to clause 10 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.

14 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.

15 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/>.

16 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.
CBL SHARE PIN 0623 June 2023

