

Curtis Banks Group

Privacy Information Notice (for Ex Clients)
on behalf of **TEMPLEMEAD PROPERTY
SOLUTIONS**

September 2023



Your future, our focus.

curtisbanks.co.uk

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 information	4
6 Disclosure of your information	4
7 Data retention	4
8 Automated decisions	4
9 Mobile data	4
10 Marketing	5
11 Transfers outside of the European Economic Area	5
12 Security and storage of information	5
13 Cookies (small text files)	5
14 Your information and your rights	5
15 Other sites and social media	6
16 Electronic mail containing personal information	6
17 Changes to our Privacy Information Notice	6
18 Contact us	6
19 Accessing our services	6

This Privacy Information Notice describes how the Curtis Banks Group collected, used and protected 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

Suffolk Life Pensions of 153 Princes Street, Ipswich, IP1 1QJ is the **Data Controller**.

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

Curtis Banks Pensions, Curtis Banks Limited and Suffolk Life Annuities 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

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 Group Plc.

2 Why we needed to collect, use and process your personal information

We collected personal information from you for our legitimate interest in order to perform our contractual obligations when you applied for our products or services.

When you completed an application for any of our products or services you understood that we would be processing your personal data for the purpose set out above.

When we collected, used and processed your sensitive personal information we would have obtained your express consent at the specific time that we needed it.

3 The information we may collect, held and processed about you

- Title;
- Full name;
- Permanent residential address and previous address (if you have lived there less than three years);
- Telephone contact number(s);
- Email address;
- Date of birth;
- National Insurance Number;
- Nationality;
- Country of residence;
- Expected retirement age;
- Whether you are married or in a registered civil partnership;
- Spouse's or registered civil partner's date of birth;
- Employment status;
- Employer's name and address;
- Financial information about you;
- Your personal bank details;
- **Agent** details;
- Supporting information to verify your identity and address;
- Outcome of identity searches and anti-money laundering due diligence;
- All communications to and from you by telephone, email, post or otherwise.

We may have, in certain circumstances, collected, processed and held sensitive personal information including any physical or mental health condition of any nature or your religious persuasion. Due to the nature of this personal information we would have explicitly asked for your consent prior to requesting it for processing.

4 How we used your personal information

- To enable you to obtain a projection or illustration;
- To process your application for the requested products or services;
- To administer the product or service provided including the payment of benefits;
- 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 provide you with access to applications in relation to the products or services you have requested;
- 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;
- 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 collected information

You may have given 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 provided when you:

- Search our website;
- Apply for products or services; 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 have also received 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 visited the Curtis Banks Group websites we may automatically collected 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 shared 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;
- **Agents** selected by you and for whom you have given prior consent for us to share personal information;
- 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;
- 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 have retained information about you:

- At the end of your contract;
- Where your application is declined; or
- Where you decide not to proceed.

This information would 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 Automated decisions

We may have used your personal data to undertake automated online identity checks, in the detection, prevention and investigation of illegal or prohibited criminal activities and to establish paperless direct debits.

9 Mobile data

We may have obtained information through mobile applications that we may offered and you or your agents use to access our websites, applications and services. Mobile applications for this purpose may have been provided by us or third parties.

Where mobile applications are provided by a third party, you would have read that third party's own privacy information notice in relation to that application. We would not have responsible for third party mobile applications and their use of your personal information.

10 Marketing

From time to time, where you may have provided consent, we may have used 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 would have taken steps to ensure that in the event that your information was transferred outside of the EEA by our service providers, appropriate measures and controls would have been 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 collected 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 created payment instructions and passed them to our banking partners, they would have been encrypted using secure technology. We would have put in place measures to guard against unauthorised or unlawful processing and against accidental loss, destruction or damage.

If you (or your agent) contacted us for details of your account, we would of asked some questions to establish your (or your agent's) identity and would have not disclosed any personal and/or account information, under any circumstances, unless we were satisfied that you (or your agent) are who you claimed to be.

Although we use market standard security software to protect your personal information, we would not have guaranteed the security of your data transmitted by you or your agent to our websites, secure portals, applications or services; any transmission is at your own risk. Once we had received your information, we would have used strict procedures and security features to try to prevent unauthorised access.

If we had given you (or you have chosen) a password to access certain areas of our websites, applications or services, you would of needed to keep this password safe. We would not have shared this password with anyone. If you believe your account had 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 obtained and used 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;
- 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 (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 you would like to exercise any of your rights please either 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 and your **agents** may, from time to time, have sent personal information to us electronically. We would have not been responsible for the way in which you or your **agent** handled personal information. Where possible, we would have insisted that you or your **agent** 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 your **agent** through electronic means we would have ensured that it is done so securely using either encrypted files or secure messaging.

17 Changes to our Privacy Information Notice

We may have changed, modified or adjusted this Privacy Information Notice from time to time; however this would not have reduced 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 have collected, or 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 collected, or 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 sippsupportteam@curtisbanks.co.uk to discuss any support adjustments that may be available to you.

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.
TMPLMD PIN 0923 September 2023

