

DATA PRIVACY NOTICE

We take your privacy very seriously and we ask that you read this privacy notice carefully as it contains important information on who we are, how and why we collect, store, use and share your personal data, your rights in relation to your personal data and on how to contact us and supervisory authorities in the event you have a complaint.

Who we are

Bankhall Support Services Limited. When we mention "Bankhall", "we", "us" or "our" we are referring to Bankhall Support Services Limited.

We collect, use and are responsible for certain personal data about you. When we do so we are required to comply with data protection law and we are responsible as a data controller of that personal data for the purposes of those laws.

The personal data we collect and use

In the course of providing our services to you and complying with our legal and regulatory obligations, we may collect the following personal information when you provide it to us:

- contact information (e.g. name, telephone number, email address and address)
- identity information (e.g. national identity card/number, FCA number, passport, drivers licence and national insurance number)
- bank account details

In addition to the above, the following personal data may be collected from you where we provide you with FCA application support services:

- financial status information, including any debts
- qualifications
- employment history
- data about criminal convictions or offences

Information collected from other sources

We may also obtain personal information from other sources. Where we obtain this information from another party it is their responsibility to make sure they explain that they will be sharing personal data with us and, where necessary, ask permission before sharing information with us.

How we use your personal data

We will use your personal data:

1. As necessary to perform our contract with you for the supply of Bankhall support services:
 - a. to take steps at your request prior to entering into it;
 - b. to decide whether to enter into it;
 - c. to correspond with you;
 - d. to manage and perform that contract, including administering payment for our services; and
 - e. to update our records.
2. As necessary for our own legitimate interests or those of other persons and organisations, e.g.:
 - a. to manage legal claims (we have a legitimate interest in protecting our organisation from breaches of legal obligations owed to us and to defend ourselves from

litigation. This is needed to ensure that our legal rights and interests are managed appropriately);

- b. to issue responses to press/news stories concerning services provided by us and/or complaints or legal claims made by you, in order to minimise the reputational impact on us;
 - c. to perform tasks in relation to our services within our group for centralised administration purposes;
 - d. to obtain feedback from you on the service you have received from us (we have a legitimate interest in operating our business. This includes ensuring that the service we provide is of a satisfactory standard);
 - e. to send you marketing communications; and
 - f. to engage with third party service providers with which we have referral/introducer arrangements with, in order to assess your eligibility to benefit from enhanced rates and services.
3. As necessary to comply with a legal obligation, e.g.:
 - a. when you exercise your rights under data protection law and make requests; and
 - b. for compliance with legal and regulatory requirements and related disclosures.
 4. Based on your consent, e.g.:
 - a. to refer you to third party service providers with which we have referral/introducer arrangements with, in order that you can benefit from enhanced rates and services which may be of interest to you; and
 - b. to send you marketing communications where we have asked for your consent to do so.

You're free at any time to change your mind and withdraw your consent. The consequence might be that we cannot do certain things for you.

Sharing your data with third parties

Subject to applicable data protection law we may share your personal data with:

- External supplier(s) of research, technology and compliance IT packages whose products and/or services you have access to through Bankhall
- Our professional indemnity insurers, legal and other professional advisers, including our insurance adviser and auditors should we need to manage legal claims
- Sesame Bankhall group companies for centralised administration purposes, including Sesame Group India Pvt Ltd
- External supplier(s) of email marketing platform services which send marketing communications on our behalf
- The Aviva group (our parent company)
- The Financial Conduct Authority

Some of these third party recipients may be based outside the European Economic Area — for further information including on how we safeguard your personal data when this occurs, see 'Transfer of your information out of the EEA'

Criminal records data

Criminal record data is considered more sensitive and so is subject to additional levels of protection under data protection legislation.

We may process criminal conviction or offence information when we provide you with our FCA application support

services. When we do so, in addition to the lawful basis for processing this information set out above, we will be processing it based upon your consent.

You're free at any time to change your mind and withdraw your consent. The consequence might be that we cannot provide you with our full FCA application support services.

Marketing

We may use personal data we hold about you to help us identify, tailor and provide you with details of products and services from us that may be of interest to you. We have a legitimate business reason to do this and will do so in accordance with any marketing preferences you have provided to us. You can tailor your communication preferences by clicking the link at the bottom of any email from us.

In addition, where you provided your consent, we may provide you with details of products and services of third parties where they may be of interest to you.

You can opt out of receiving marketing at any time. If you wish to amend your marketing preferences please contact our Client Relationship Team:

By phone: 0345 300 5326 option 2

By email: clientrelationship@bankhall.co.uk

By post: Bankhall Client Support, Bankhall Support Services Limited, Fourth Floor, Jackson House, Sibson Rd, Sale M33 7RR

In addition, you can opt out of receiving marketing at any time by clicking the 'unsubscribe' link at the bottom of every marketing email.

Whether information has to be provided by you, and if so why

If you do not wish us to collect and use your personal information in the ways set out in this privacy notice, it may mean that we will be unable to provide you with our products or services.

How long your personal data will be kept

We will hold your personal data for differing periods of time depending upon the reason we have for processing it. The following criteria are used to determine data retention periods for your personal data:

- Retention in case of queries – we will retain your personal data for as long as we reasonably consider it necessary to deal with your queries (e.g. any questions you may have in relation to the services).
- Retention in case of claims – we will retain your personal data for as long as we reasonably consider that you might legally bring a claim against us.
- Retention in accordance with legal and regulatory requirements – we will retain your personal data after we have ceased providing services to you for as long as we are required/permitted to retain it for based upon our legal and regulatory obligations.

Transfer of your information out of the EEA

We may transfer your personal data to the following which are located outside the European Economic Area (EEA) as follows:

- Sesame Group India Pvt Ltd, based in India. This is a company in the same group as Bankhall which is used to produce compliance management information around the outcomes of files that we have reviewed. India does not have the same data protection laws as the United Kingdom and EEA. Whilst the European Commission has not given a formal decision that India provides an adequate level of data protection similar to those which apply in the United Kingdom and EEA, any transfer of your personal data will be subject to a European Commission approved contract designed to help safeguard your privacy rights and give you remedies in the unlikely event of a misuse of your personal data.
- Suppliers and sub-contractors which provide services to us. If we do transfer your personal data to our suppliers and sub-contractors outside of the EEA, we will make sure that it is protected in a similar way as if it was being used in the EEA. We'll use one of these safeguards:
 - the transfer will be to a non-EEA country with privacy laws that give the same protection as the EEA
 - the transfer will be subject to a European Commission approved contract designed to help safeguard your privacy rights and give you remedies in the unlikely event of a misuse of your personal data
 - the transfer will be to organisations that are part of Privacy Shield (this is a framework that sets privacy standards for data sent between the US and EU countries and it makes sure those standards are similar to the standards used within the EEA)
 - the transfer will be subject to binding corporate rules (agreements governing transfers made between organisations within in a corporate group)

You have a right to ask us for more information about any transfer of your personal data outside of the EEA, including the safeguards in place. To learn more, please see 'Your rights' below.

Your rights

You have legal rights under data protection law in relation to your personal data. These are set out under the below headings:

- To access personal data
- To correct / erase personal data
- To restrict how we use personal data
- To object to how we use personal data
- To ask us to transfer personal data to another organisation
- To object to automated decisions
- To understand how we protect information transferred outside Europe
- To find out more about how we use personal data

We may ask you for proof of identity when making a request to exercise any of these rights. We do this to ensure we only disclose information where we know we are dealing with the right individual.

We will not ask for a fee, unless we think your request is unfounded, repetitive or excessive. Where a fee is necessary, we will inform you before proceeding with your request.

We aim to respond to all valid requests within one month. It may however take us longer if the request is particularly

complicated or you have made several requests. We will always let you know if we think a response will take longer than one month. To speed up our response, we may ask you to provide more detail about what you want to receive or are concerned about.

We may not always be able to fully address your request, for example if it would impact the duty of confidentiality we owe to others, or if we are otherwise legally entitled to deal with the request in a different way.

To access personal data

You can ask us to confirm whether or not we have and are using your personal data. You can also ask to get a copy of your personal data from us and for information on how we process it.

To rectify / erase personal data

You can ask that we rectify any information about you which is incorrect. We will be happy to rectify such information but would need to verify the accuracy of the information first.

You can ask that we erase your personal data if you think we no longer need to use it for the purpose we collected it from you.

You can also ask that we erase your personal data if you have either withdrawn your consent to us using your information (if we originally asked for your consent to use your information), or exercised your right to object to further legitimate use of your information, or where we have used it unlawfully or where we are subject to a legal obligation to erase your personal data.

We may not always be able to comply with your request, for example where we need to keep using your personal data in order to comply with our legal obligation or where we need to use your personal data to establish, exercise or defend legal claims.

To restrict our use of personal data

You can ask that we restrict our use of your personal data in certain circumstances, for example:

- where you think the information is inaccurate and we need to verify it;
- where our use of your personal data is not lawful but you do not want us to erase it;
- where the information is no longer required for the purposes for which it was collected but we need it to establish, exercise or defend legal claims; or
- where you have objected to our use of your personal data but we still need to verify if we have overriding grounds to use it.

We can continue to use your personal data following a request for restriction where we have your consent to use it; or we need to use it to establish, exercise or defend legal claims, or we need to use it to protect the rights of another individual or a company.

To object to use of personal data

You can object to any use of your personal data which we have justified on the basis of our legitimate interest, if you believe your fundamental rights and freedoms to data protection outweigh our legitimate interest in using the information. If you raise an objection, we may continue to use the personal data if we can demonstrate that we have compelling legitimate interests to use the information.

To request a transfer of personal data

You can ask us to provide your personal data to you in a structured, commonly used, machine-readable format, or you can ask to have it transferred directly to another data controller (e.g. another company).

You may only exercise this right where we use your personal data in order to perform a contract with you, or where we asked for your consent to use your personal data. This right does not apply to any personal data which we hold or process outside automated means.

To contest decisions based on automatic decision making

If we made a decision about you based solely by automated means (i.e. with no human intervention), and the decision made by us produces a legal effect concerning you, or significantly affects you, you may have the right to contest that decision, express your point of view and ask for a human review. These rights do not apply where we are authorised by law to make such decisions and have adopted suitable safeguards in our decision making processes to protect your rights and freedoms.

To obtain a copy of our safety measures for transfers outside of Europe

You can ask for a copy of, or reference to, the safeguards we have put in place when your personal data is transferred outside of the European Economic Area. We are not required to share details of these safeguards where sharing such details would affect our commercial position, or create a security risk.

You can contact us for more information

If you are not satisfied with the level of information provided in this privacy notice, you can ask us about what personal data we have about you, what we use your information for, who we disclose your information to, whether we transfer it abroad, how we protect it, how long we keep it for, what rights you have, how you can make a complaint, where we got your data from and whether we have carried out any automated decision making using your personal data.

If you would like to exercise any of the above rights, please:

- email or write to our Data Protection Officer at dataprivacy@sbg.co.uk or Bankhall Support Services Limited, Fourth Floor, Jackson House, Sibson Rd, Sale M33 7RR;
- let us have enough information to identify you, e.g. name, address;
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- let us know the information to which your request relates.

Keeping your personal data secure

We have appropriate security measures in place to prevent personal data from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal data to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Data anonymization and aggregation

Your personal data may be converted into statistical or aggregated data which can't be used to identify you, then used to produce statistical research and reports.

Our supervisory authority

If you are not happy with the way we are handling your information, you have a right to lodge a complaint with the Information Commissioners Office (www.ico.org.uk).

We ask that you please attempt to resolve any issues with us before the ICO.

How to contact us

Please contact our Data Protection Officer if you have any questions about this privacy notice or the information we hold about you.

If you wish to contact our Data Protection Officer, please send an email to dataprivacy@sbg.co.uk or write to Bankhall Support Services Limited, Fourth Floor, Jackson House, Sibson Rd, Sale M33 7RR