

Data Privacy Notice | We care about your data

Because we care about you and the information you share with us, we wanted to provide as much detail as possible about what we do with the data we hold about you.

This Data Privacy Notice gives you, as our AR firm, the information on how we process your data.

Our commitments to you are:

		
We protect your personal information Keeping your personal information safe and secure is a priority. We use safeguards such as firewalls and encryption to help keep your personal information safe.	We do not sell your personal information We sometimes share your information with other companies to provide the products and services you want. It will only be used for the specific purposes that we agree in advance, not for marketing, additional products or services.	We use your information to improve our products and services We use personal information to continually improve our services and create better investment products to offer you.

In this Privacy Notice is for our AR firms so that you can find out more about:

- What personal information we collect and use;
- How we collect, use and share personal information
- Your rights in relation to any personal information we hold about you; and
- How you can contact us with any questions you may have about information privacy.

What is the purpose of this document?

This privacy notice describes how Sesame collects and uses personal information about you during your contract with Sesame as an Appointed Representative (AR) firm, in accordance with the Data Protection Act 2018, also known as the UK General Data Protection Regulation (GDPR).

Sesame is a 'data controller' for your data in the respect of this privacy agreement and your relationship with Sesame services. This means that Sesame is responsible for deciding how information about you is held and used, this includes the use of any data processors or sub-processors for you and your customers. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This Privacy Notice makes you aware of how and why your personal data will be used, namely for the purposes of informing you that as an adviser within the Sesame network you are authorised by us to advise on products and services in accordance with Financial Conduct Authority (FCA) rules and regulations as a registered principle. Your firm, also known as an Authorised representative (AR), is as an appointed representative of Sesame, meaning Sesame is responsible for the regulated activities they are authorised to perform.

When we mention "Sesame", "we", "us" or "our" we are referring to Sesame Limited

You can contact the Data Protection Officer (DPO) on dataprivacy@sbg.co.uk, or at Sesame Ltd, Fourth Floor, Jackson House, Sibson Rd, Sale M33 7RR.

Sesame ensures it upholds the highest standards of data protection principles and adheres to the following standards across the business. Data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that Sesame have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes Sesame have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes Sesame have told you about.
- Kept securely.

Further information is detailed in our Data Protection Policy and reviewed by Sesame annually or when any major changes are required, through the group DPO.



What information is collected and how?

Information is collected about you as an AR firm and your customers in order to comply with required legal and regulatory obligations.

Information is normally collected and provided by you, but we may use other sources of information to check certain elements of your responsibility and our responsibilities under Financial Conduct Authority (FCA) regulations and rules. Further information on the types of data collected can be found in para 4.

What's the purpose of collection?

Sesame is authorised and regulated by the Financial Conduct Authority (FCA), this means that its responsible for the AR firms and the advice and product that they give and sell to you. The FCA has a number of rules and regulations that must be followed to ensure you receive fair and transparent advice.

Any data given to us by the AR firms is solely used for the purpose of providing legal and regulatory compliance and ensuring you get the best possible service.

Lawful reason for processing

The lawful basis for processing your data, under Article 6(1) of the UK GDPR is 'Legal obligation', 'Legitimate Interest' and 'contractual necessity', this is depending on the services provided to you and advice given by the AR firms. We processes this data in line with the requirements of the FCA and the product guidelines given to you to ensure compliance with your customers.

All lawful basis for processing are considered against every service to ensure they are in line with legal requirements and your rights. You also have a responsibility to inform customers how you process their data and how you comply with data protection legislation, in line with Sesame guidance and policy.

Further information and guidance can be found by contacting 0345 230 6000 or emailing the Sesame DPO, as per the contact details in para 1.

How will your information be used?

We will use the personal data in line with the information given to you in your contract with Sesame and any terms and conditions delivered as part of a service or system. We will ensure all the required security and compliance measures are put in place throughout the complete journey of your interaction with the Sesame network.



What information is held about you?

AR firms provide information about you in order to supply a service or product that you have requested. The information held about you is:

- contact information
- identity information
- financial information
- performance records
- data about criminal convictions or offences
- employment history/network history

We may also obtain personal information from other sources, required to complete all the relevant checks in line with the service or product provision and the rules and regulations set out by the FCA.

As an AR firm, you must inform customers about what will happen with their data and that additional sources of information will be collected, where necessary, the personal data obtained from other sources may include the following:

From your firm:

- contact information
- identity information
- financial information
- performance records

From your previous network or employer (if applicable):

- contact information
- identity information
- financial information
- performance records
- employment history/network history

From third party referees nominated by you (where you were previously self-employed):

- contact information
- identity information
- From product providers:
- identity information
- performance records



From identification and verification checking agencies:

- identity information
- sanction check information
- From credit monitoring agencies:
- contact information
- financial information
- From employment screening agencies:
- data about criminal convictions or offences

Some of the information types collected, may be deemed special categories of data under the UK GDPR. Please be assured we take every reasonable measure to ensure data minimisation and security is in place and that any special or sensitive categories of data are fully protected and only used in ways that do not compromise your rights and freedoms under data protection legislation for you and your customers.

How long is your data kept?

We will hold your personal data for differing periods of time depending upon the reason we have for collecting and 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 Sesame 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 Sesame 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 Sesame have ceased providing services to you for as long as Sesame are required/permitted to retain it for based upon our legal and regulatory obligation.

All record retention rights are subject to review, in line with the SBG data handling policy and must comply with legal and regulatory requirements. You have the right to request your data be removed, where appropriate, these details are stated in para 7.



Who is your data shared with?

We may share your data with approved third parties and parties within the Sesame Bankhall Group to ensure that you receive the best possible service. Sesame do not sell or pass on your data for marketing purposes, it is only used for the service provision stated or for the marketing of new services within Sesame or its parent Sesame Bankhall Group, where there is a legitimate interest in giving you additional services or advise.

Where possible all Sesame data is stored within the EEA but may need to be accessed or stored in a country outside of the EEA that does not provide protections in line with GDPR. In these cases Sesame relies on the International Data Transfer Agreement (IDTA) to ensure adequate protections are in place in line with required legislation.

These controls are audited to ensure they are in place in line with SBG policy and UK GDPR and in the majority of cases the processing activity is undertaken by an entity within the Sesame Bankhall Group and so is within direct control of Sesame and all policy and controls we give data in the EEA.

What are your rights?

Under UK GDPR, you have the following rights:

- **Right to be Informed** – You have the right to be informed about the collection and use of your personal data
- **Right of Access** – You have the right to access and receive a copy of your personal data and other supplementary information
- **Right to Rectification** – You have the right to have inaccurate personal data rectified, or completed if it is incomplete
- **Right to Erasure** – You have the right to have personal data erased
- **Right to restrict processing** – You have the right to restriction or suppression of personal data
- **Right to data portability** – You can request a copy of data and/or to reuse this data for your own purposes across different services
- **Rights relating to automated decision making including profiling** – You have specific rights when automated decisions are made about you or you are profiled as part of a service. More information on this right can be sought through the group DPO.

To exercise these rights, contact us using the details provided in para 1. We will respond within 1 calendar month unless the request is particularly complex and then an extension with a maximum time of 3 calendar months, may be requested. You will be informed of any extension or issues in resolving your request.



How Sesame protect your data

We consider security and the required technical and organisational measures required to comply with Article 5(1) of the UK GDPR meaning that it will ensure personal data is processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

The business has an extensive cyber and information security framework and associate policies that ensure the technical and organisational measures are always kept up to date. This includes that of our suppliers and their responsibilities as processors and sub-processors.

Updates to this notice

We reserve the right to update this privacy notice at any time, and will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

Complaints

Any complaints or concerns can be reported in the first instance to the SBG DPO on dataprivacy@sbg.co.uk or by visiting the Sesame website and using the contact details or feedback form there – www.sbg.co.uk.

If you are not happy with the way Sesame deal with any complaints or have any further concerns or complaints, you have the right to lodge a complaint with the UK's data protection regulator, the Information Commissioners Office (ICO), who can be contacted through their website at <https://ico.org.uk/global/contact-us> or by writing to:

Information Commissioner's Office

Wycliffe House
Water Lane
Wilmslow,
Cheshire
SK9 5AF

