Sesame Data Privacy Notice

New Appointed Representatives

1. What is the purpose of this document?

This privacy notice describes how Sesame collects and uses personal information about you during and after your working relationship with Sesame, in accordance with the Data Protection Act 2018, also known as the UK General Data Protection Regulation (GDPR).

Sesame is a "data controller". 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. Sesame is 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 matching you to prospective businesses and partners who are members of our network of financial advice firms for the provision of financial advice and services.

Activity	Role of Sesame	Role of AR Firm / Adviser
Network oversight	Controller	Independent Controller
Competence and supervision	Controller	Data Subject
FCA regulatory monitoring	Controller	Data Subject
Customer advice provision	Independent Controller	Controller
Product provider submissions	Independent Controller	Independent Controller

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 we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we 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 we have told you about.
- Kept securely.

Further information is detailed in our Data Protection Policy and reviewed annually or when any major changes are required.

2. Why and how will your information be processed?

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.

Any additional information collected will be from required third parties, public sources or public authorities so that checks and compliance requirements can be completed in line with our responsibility to ensure you get the best possible advice and service.

Sesame processes your personal data in order to provide you details of services from Sesame which we think maybe of interest to you. This includes marketing and promotions about current and new services.

2.1 Lawful reason for processing

The lawful basis for processing your data, under Article 6(1) of the UK GDPR is 'Consent' and 'Legitimate Interest', this is depending on the services provided to you and how your data was collected.

All lawful basis for processing are considered against every service to ensure they are in line with legal requirements and your rights.

2.2 How is your information Collected?

Sesame collect personal information about you when you add your details to our website and afterwards to discuss potential vacancies with you.

2.3 How will your information be used?

We will use the personal information we collect about you to contact you by email and telephone about Sesame services.

You can opt out of receiving marketing at any time by clicking on the unsubscribe link on our emails or by contacting us by phone **0345 230 6000** (option 2) or through the online contact form on our website - Contact Sesame - Email or Phone our helpful team

We will not use your information for any automated decision making that will have any impact on your rights and freedoms.

3. What information is held about you?

In connection with marketing we may collect, store, and use the following categories of personal information about you:

- Your name, firm name, phone number(s), email address and general details about you
- Your CV and information about the role you have applied for

4. How long is your data kept?

Sesame will retain your personal information for a period of 6 months after you have been successfully matched to a vacancy. If you are not matched to a vacancy, your information will be kept for no longer than 12 months, unless you state otherwise. Sesame retain your personal information for that period, in the event of a legal claim, that it can be shown you have not been discriminated against on prohibited grounds and that you have been matched to the current vacancies in a fair and transparent way.

After this period, your data will be securely destroyed in accordance with applicable laws and regulations. If you wish Sesame to retain your personal information on file, on the basis that a further opportunity may arise in future and you may wish to be considered for those positions, please let the recruitment team know and this will be arranged for a fixed period.

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.

5. Who is your data shared your data with?

Sesame will only share your personal information with network firms for the purposes of assessing your suitability for a role they may have. You can find out if a firm is a member of the network by asking or visiting https://register.fca.org.uk/.

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. Categories of recipients may include but are not limited to the following: Sesame Bankhall Group companies, Product providers, Regulators (FCA, ICO), Auditors, Professional advisers, IT hosting providers, Identity verification providers, Credit reference agencies, Financial crime screening providers.

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 advice.

Purpose	**Lawful Basis**
FCA supervision of AR firms	Article 6(1)(c) Legal Obligation
Compliance monitoring	Article 6(1)(c) Legal Obligation
Fraud prevention	Article 6(1)(f) Legitimate Interests
Network administration	Article 6(1)(f) Legitimate Interests
Customer support	Article 6(1)(f) Legitimate Interests

Where possible all Sesame data is stored within the UK and EEA but may need to be accessed or stored in a country outside of the Uk or EEA that does not provide protections in line with GDPR or UK GDPR.

In these cases Sesame normally relies on the International Data Transfer Agreement (IDTA) or Standard Contractual Clauses in line with the data protection test to ensure adequate protections are in place in line with required legislation.

We may routinely transfer personal data outside the UK where necessary including with our branch

based in India. Where this occurs, transfers are protected through adequacy regulations, the UK International Data Transfer Agreement (IDTA), Addendum to EU SCCs, or other recognised safeguards.

Category of Recipient	Purpose
Product providers	Policy administration and servicing
Credit reference agencies	Identity verification and credit checks
Fraud prevention agencies	Fraud detection and prevention
Professional advisers	Legal and regulatory support
IT and cloud service providers	System hosting and support
Regulatory bodies	Compliance with legal obligations
Group companies	Operational administration and oversight

These controls are audited to ensure they are in place in lie 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.

6. 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 Sesame 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.

When we deal with a request, we will carry out reasonable and proportionate searches to locate your personal data. We may also ask you for information to confirm your identity, or to help us understand your request, where this is reasonably necessary. Where we ask for such information, the time limit for responding to your request will be paused until we receive what we have asked for.

Exercising these rights is free of charge in most cases. However, where a request is manifestly unfounded or excessive, we may charge a reasonable fee or decline to act on it, and we will explain our reasons if we do so. You also have the right to complain to the Information Commissioner's Office (ICO) at any time if you are unhappy with how we have handled your personal data or a request you have made. Details of how to contact the ICO are set out in the "Complaints" section below.

7. How Sesame protects your data

Sesame 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.

You may request further information regarding the safeguards applied to your personal data by contacting the DPO.

8. Use of Artificial Intelligence

Sesame may use approved artificial intelligence and automated technologies to support quality assurance, regulatory oversight, complaint investigations, operational administration, data analysis and service improvement activities.

These technologies are used to assist employees and authorised personnel rather than replace human decision making. We implement contractual, technical and organisational safeguards to protect personal information processed through such systems.

We do not currently make decisions that have legal or similarly significant effects on individuals solely through automated processing. Should this position change, we will update this notice and provide any additional information required by applicable data protection laws.

9. Updates to this Notice

Sesame reserve the right to update this privacy notice at any time, and we 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.

10. Complaints

If you have any concerns about how Sesame collects or uses your personal data, you can make a complaint to us. You can do this by completing the data protection complaint form on our website at www.sbg.co.uk , by emailing our Data Protection Officer at dataprivacy@sbg.co.uk , or by writing to the Data Protection Officer at Sesame Ltd, Fourth Floor, Jackson House, Sibson Rd, Sale M33 7RR.

When we receive your complaint, we will acknowledge it within 30 days. We will then make appropriate enquiries into the matters you have raised, deal with your complaint without undue delay, and keep you informed of progress. Once we have concluded our enquiries, we will let you know the outcome.

We ask that you raise your complaint with us first, so that we have the opportunity to put things

right. If you are not satisfied with how we have handled your complaint, or you have any further concerns, you have the right to lodge a complaint with the UK's data protection regulator, the Information Commissioner's Office (ICO). The ICO 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