BANKHALL

Bankhall Data Privacy Notice

Existing Client in Bankhall

1. What is the purpose of this document?

This Privacy Notice explains how Bankhall Support Services Limited ("Bankhall", "we", "us" or "our") collects, uses, stores and shares your personal data when you access, purchase or receive our products and services, and your rights in relation to that personal data.

Bankhall acts as a Data Controller for the personal data processed in relation to the services it provides directly to you. In certain circumstances, Bankhall may also act as a Data Processor on behalf of another organisation. Where this applies, the processing will be governed by separate contractual arrangements and privacy information issued by the relevant Data Controller.

Any data processing carried out by Bankhall for your customers, as a data processor, are covered under specific Bankhall Terms and Conditions. This means that Bankhall is responsible for deciding how information about you is held and used, this includes the use of any data processors or sub-processors. Bankhall is required under data protection legislation to notify you of the information contained in this privacy notice.

This Privacy Notice explains how we process personal information in connection with the provision of our services, our business relationship with you, regulatory and compliance obligations, marketing activities and the operation of the Sesame Bankhall Group network.

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

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

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

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

2. What information is collected and how?

In the course of providing services to you and complying with the required legal and regulatory obligations, we may collect the following personal information:

- 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)
- Financial Information
- Performance records
- Employment History
- Data about criminal convictions or offences
- Opinions and feedback

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

We may also obtain personal information from other sources. Where other information is obtained 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 this information.

3. Why and how will your information be processed?

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

Where electronic marketing communications are sent, Bankhall will comply with the Privacy and Electronic Communications Regulations (PECR). You may unsubscribe from marketing communications at any time using the unsubscribe facility contained within the communication or by contacting us.

Where you provide information through our website contact forms, enquiry forms, registration forms, downloadable content requests, social media channels, email correspondence, telephone enquiries or other contact methods, we may use that information to respond to your enquiry, administer our services, maintain records of our interactions and, where permitted under applicable data protection and electronic marketing legislation, send you information regarding relevant products, services, events, regulatory updates and business opportunities offered by Bankhall and other companies within the Sesame Bankhall Group. You may opt out of marketing communications at any time.

Marketing communications may be sent on the basis of legitimate interests where permitted by law, including the PECR soft opt-in exemption, or on the basis of consent where consent is required.

2.1 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 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. If you require more information about the lawful basis for processing based on a service, please contact the SBG DPO.

2.2 How will your information be used?

We will use the personal information provided by you for the provision of services and marketing of new services in line with this privacy policy.

Any customer data provided, will be covered by the Terms and Conditions under which the service is provided.

We may use your personal data:

1. As necessary to perform a 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;
   e. to update records.

2. As necessary for our own legitimate interests or those of other persons and organisations, e.g.:
   a. to manage legal claims (Bankhall have a legitimate interest in protecting the organisation from breaches of legal obligations and to defend the business from litigation. This is needed to ensure that our legal rights and interests are managed appropriately);
   b. to issue responses to press correspondence, complaints or legal claims made by you, in order to minimise the reputational impact on the business;
   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 (we have a legitimate interest in operating the business. This includes ensuring that the service Bankhall provide is of a satisfactory standard);
   e. to send you marketing communications;
   f. to engage with third party service providers with which Bankhall 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,
   a. to refer you to third party service providers with which Bankhall 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 Bankhall 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 Bankhall cannot do certain things for you or provide certain services.

4. What information is held about you?

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

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

Criminal record data is considered more sensitive and so is subject to additional levels of protection under data protection legislation. Where criminal offence data is processed, Bankhall relies on the applicable condition under Schedule 1 of the Data Protection Act 2018 together with a relevant UK GDPR lawful basis.

Bankhall may process criminal conviction or offence information when the business provides you with FCA application support services. In addition to the lawful basis for processing this information set out above, Bankhall will be processing it based upon your consent.

Bankhall may use limited profiling and automated tools via third parties to support service delivery, fraud prevention, information security, or regulatory compliance. No decision producing a legal or similarly significant effect will be made solely by automated means without appropriate safeguards or human intervention and assessment.

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

5. How long is your data 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 Bankhall services 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 Bankhall 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 Bankhall services 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.

We will only retain your personal information for as long as necessary to fulfil the purposes for which it was collected, including to provide services to you, maintain our business relationship, comply with legal, regulatory, tax, accounting and record-keeping obligations, resolve disputes, enforce our agreements and protect our legal rights.

When determining the appropriate retention period, we consider the nature, sensitivity and volume of the personal data, the potential risk of harm from unauthorised use or disclosure, the purposes for which we process the information, applicable legal and regulatory requirements, and relevant limitation periods.

Once personal information is no longer required, it will be securely deleted, anonymised or otherwise disposed of in accordance with our records management and retention procedures.

Further information regarding specific retention periods applicable to particular categories of personal data may be obtained by contacting the Privacy Team.

6. Who is your data shared your data 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. We 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 Bankhall or its parent Sesame Bankhall Group.

Your information may be shared with:

- Sesame Bankhall Group companies.
- Professional advisers (legal, compliance and audit providers).
- IT and cloud hosting providers.
- FCA-authorised firms and appointed representatives where necessary.
- Payment processing providers.
- Regulatory bodies including the FCA, ICO, HMRC and law enforcement agencies where

legally required.

- Third-party suppliers who provide services on our behalf under appropriate contractual safeguards.

Where personal data is transferred outside the UK or EEA, Bankhall will ensure appropriate safeguards are implemented in accordance with UK GDPR. These safeguards may include:

- UK International Data Transfer Agreements (IDTAs)
- UK Addendum to the EU Standard Contractual Clauses
- Transfers to countries recognised by the UK Government as providing adequate protection

Where possible all Bankhall 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. In these cases Bankhall 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 Bankhall Support Services and all policy and controls we give data in the UK and EEA.

Further information regarding international transfers may be requested by contacting the DPO.

7. 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.
- Right to object to processing based on legitimate interests.
- Right to withdraw consent.
- Right to complain directly to the ICO.
- Right to request human intervention where automated decisions are made.

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.

8. How Bankhall protect your data

Bankhall 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.

9. Our use of Artificial Intelligence

Bankhall may use artificial intelligence, machine learning or automated technologies to assist with administrative activities, service delivery, information security, compliance monitoring and business operations.

Artificial intelligence and automated technologies may be used 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.

Personal information will not be used to train publicly available artificial intelligence models unless specifically disclosed and permitted by applicable law.

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.

10. Updates to this notice

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

11. Complaints

Any complaints or concerns can be reported in the first instance to the SBG DPO on dataprivacy@sbg.co.uk.

If you are not happy with the way Bankhall 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