Sesame Data Privacy Notice

AR firms of Sesame

1. 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.

This privacy notice applies to directors, advisers, employees, contractors and other representatives of Appointed Representative firms within the Sesame network. It does not replace the privacy notices that AR firms must provide to their own customers.

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

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 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.

2. 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.

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.

3. 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. Sesame processes personal information for the purposes of monitoring competence, fitness and propriety, adherence to FCA requirements, quality assurance, complaints handling, supervision and oversight within the appointed representative network.

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.

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 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.

2.2 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.

4. 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
- Credit monitoring information

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 reference and reporting agencies:
    - contact information
    - financial information
    - Credit related and financial standing information (where applicable)
- 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.

Where special category personal data is processed, Sesame relies on Article 9(2)(g) UK GDPR (substantial public interest), Article 9(2)(b) (employment and social protection obligations) and other relevant conditions under Schedule 1 of the Data Protection Act 2018 as appropriate. Criminal offence data is processed only where necessary to meet regulatory, legal and fitness and propriety obligations.

Credit Reference and Affordability Checks

To comply with our legal, regulatory and contractual obligations, Sesame may process personal data for the purposes of preventing, detecting and investigating financial crime. This includes:

- sanctions screening against applicable UK and international sanctions lists;
- anti-money laundering (AML) and counter-terrorist financing checks;
- fraud detection, prevention and investigation activities;
- assessing regulatory risk and fitness and propriety requirements;
- identifying unusual, suspicious or potentially unlawful activity;
- supporting internal investigations and responding to requests from regulators, law enforcement agencies or other competent authorities where legally required.

To support these activities, Sesame may obtain information from identity verification providers, sanctions screening providers, credit reference agencies, fraud prevention agencies, public registers and regulatory bodies. Information may be shared with relevant authorities, regulators, law enforcement agencies and other authorised organisations where required by law or where necessary for the prevention and detection of crime.

We may use the following credit reference agencies when verifying and processing data you provide to us and your AR Firm:

- **Organisation Role Regulatory Status Creditsafe Business Solutions Limited**: Provides access to credit and identity information. Authorised and regulated by the Financial Conduct Authority (FCA). Firm Reference Number: 742313.

- **TransUnion International UK Limited**: Supplies credit reference and identity verification data to Creditsafe. Authorised and regulated by the Financial Conduct Authority (FCA). Firm Reference Number: 737740.

For more information about how these organisations collect and use personal data, please refer to their privacy information:

Organisation	Privacy Information
Creditsafe	Transparency Notice – Customers & Suppliers: https://www.creditsafe.com/gb/en/legal/transparency-notice-customer-supplier.html
TransUnion	Credit Reference Agency Information Notice (CRAIN): https://www.transunion.co.uk/legal/privacy-centre/pc-credit-reference
TransUnion	Bureau Privacy Notice: https://www.transunion.co.uk/legal/privacy-centre/pc-bureau

Important: Credit reference agency searches may leave a record on your credit file. Where applicable, we will explain whether a search is a "soft search" (which does not affect your credit score) or a "hard search" (which may be visible to other lenders and could affect future lending decisions).

Sesame may use information obtained from credit reference agencies and fraud prevention agencies as part of our internal monitoring, quality assessments and verification processes. Any significant decisions affecting you are not made solely by automated means and will involve appropriate human review.

We do not make decisions about you solely by automated means. However, lenders, insurers or other product providers may use automated decision-making as part of their own assessment processes. Further information will be provided by the relevant provider where applicable.

This processing helps Sesame maintain the integrity of its network, comply with Financial Conduct Authority requirements and protect customers, firms and the wider financial services sector from financial crime risks.

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 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.

6. 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. 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.

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.

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.

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.

8. 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.

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

9. 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.

10. 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.

Sesame maintains records of processing activities, carries out privacy assessments where required, implements technical and organisational security measures and monitors compliance with applicable data protection legislation.

11. 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