BANKHALL.

Bankhall Data Privacy Notice

Advisors Interested in joining 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 personal information relating to individuals who express an interest in joining Bankhall, enquire about our services, attend our events, download our content or otherwise engage with us before becoming a client.

Bankhall is a "data controller". 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 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.

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

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.

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 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. What information is collected and how?

We collect personal information directly from you, from publicly available sources, from your organisation, from professional networks and industry sources, from referrals, and through your interactions with our websites, forms, email communications, events, webinars, social media channels and other business development activities.

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.

3. Why and how will your information be processed?

Bankhall processes 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 'Consent' and 'Legitimate Interest', this is depending on the services provided to you and how your data was collected.

The lawful basis for processing your personal information may include:

- Consent.

- Legitimate Interests.
- Steps taken at your request prior to entering into a contract.
- Compliance with legal or regulatory obligations.

Marketing communications may be sent on the basis of legitimate interests where permitted by law, including under applicable PECR provisions, or on the basis of consent where consent is required.

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 will your information be used?

We will use the personal information we collect about you to contact you by email and telephone about Bankhall 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 300 5326 (option 2) or email: business.solutions@bankhall.co.uk
We will not use your information for any automated decision making that will have any impact on your rights and freedoms.

4. 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 your firm.

5. How long is your data kept?

We retain personal information only for as long as necessary to fulfil the purposes for which it was collected and to meet our legal, regulatory, contractual and operational requirements. Retention periods are determined based on the nature of the information, the purpose of processing and applicable legal or regulatory obligations.

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

Further information regarding our retention practices is available from the Privacy Team upon request.

6. Who is your data shared your data with?

We will only share your data with Bankhall support services staff and may share with the wider Sesame Bankhall Group employees, depending on the services you have shown interest in.

Personal information may be shared with:

- Companies within the Sesame Bankhall Group.
- Business development and relationship management teams.
- Technology and hosting providers.
- Professional advisers including legal, audit and compliance providers.
- Regulatory bodies and law enforcement agencies where required.
- Service providers acting on our behalf under appropriate contractual controls.

Where personal information is transferred outside the United Kingdom and EEA, Bankhall will ensure appropriate safeguards are implemented in accordance with UK GDPR, including the use of approved transfer mechanisms where required. Further information is available upon request.

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 we 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.

Bankhall maintains a comprehensive information security, cyber security and data protection framework designed to protect personal information against accidental loss, unauthorised access, alteration, disclosure or destruction. Security controls are regularly reviewed and tested to ensure they remain effective and proportionate to the risks presented by the processing activities undertaken.

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

We 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.

11. 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 Bankhall website and using the contact details or feedback form there – www.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