

Privacy Notice for Protection Pledge Participants

What is the purpose of this document?

Sesame Bankhall Group Limited ("SBG") is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. This Privacy Notice makes you aware of how and why your personal data will be used, namely for the purposes of your participation in our protection campaign ("the Campaign"). It provides you with certain information that must be provided under the General Data Protection Regulation (GDPR). You can contact us at Sesame Bankhall Group Ltd, Fourth Floor, Jackson House, Sibson Road, Sale M33 7RR.

The personal information we collect about you

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

- Your name, firm name, email address.
- Your opinion about advising on protection products.

How is your personal information collected?

We collect personal information about you when you sign-up to our Protection Pledge.

How we will use personal information about you

We will use the personal information we collect about you for general administration of the Campaign and to share relevant support and insights relating to protection via email or telephone.

Situations in which we will use your personal information

We need all the categories of information in the list above to administer the Campaign to pursue legitimate interests of our own or those of third parties ("Legitimate interests"), provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below.

Reason for processing	Lawful basis for processing	Recipients
Campaign delivery including signposting to relevant solutions, support and products and tailored support from your SBG Account Manager if you already have one.	Legitimate Interests	Sesame Bankhall Group companies (including Sesame Limited, Bankhall Support Services Limited, Premier Mortgage Service Limited), and Sesame Group India Pvt Ltd.
To analyse overall engagement with the Campaign as well as adviser engagement with protection in general.	Legitimate Interests	Sesame Bankhall Group companies (including Sesame Limited, Bankhall Support Services Limited Premier Mortgage Service Limited), and Sesame Group India Pvt Ltd.

Who we share your data with

We will not share your data with anyone outside SBG except where we engage third party service providers.

Data security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data retention

How long will you use my information for?

We will retain your personal information for a maximum period of 12 months from when it is collected.

We retain your personal information for that period so we can share relevant and interesting developments with you after the campaign has ended.

Your rights in connection with your Personal Data

Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Data Protection Officer at dataprivacy@sbg.co.uk.

Data protection officer

We have appointed a data protection officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO by email at dataprivacy@sbg.co.uk or by post at Sesame Bankhall Group, Fourth Floor, Jackson House, Sibson Road, Sale M33 7RR. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.