



## DATA PRIVACY NOTICE

We take your privacy very seriously and we ask that you read this privacy notice carefully as it contains important information on who we are, how and why we collect, store, use and share your personal data, your rights in relation to your personal data and on how to contact us and supervisory authorities in the event you have a complaint.

*Italicised* words in this privacy notice have the meaning set out in the Glossary of Terms at the end of this document.

### Who we are

Sesame Limited collects, uses and is responsible for certain personal data about you. When we do so we are required to comply with *data protection regulation* and we are responsible as a *data controller* of that personal data for the purposes of those laws.

When we mention "Sesame", "we", "us" or "our" we are referring to Sesame Limited. You can contact us at: Sesame Limited, Fourth Floor, Jackson House, Sibson Rd, Sale M33 7RR.

Your *adviser* is an appointed representative of *Sesame*. This means that *Sesame* is responsible for the regulated activities performed by your *adviser* as set out in the *initial disclosure document* given to you by your *adviser*. In other words, we are responsible for making sure that authorised sales your *adviser* makes to you and advice your *adviser* gives to you are compliant with the rules and regulations that apply to financial services in the UK and with our policies and procedures.

We and your *adviser* have certain shared systems (and so shared access to your personal data). This means that in respect of certain personal data of yours, we and your *adviser* will be joint *data controllers*.

The manner in which your *adviser* will process your personal data is set out in a separate privacy notice which your *adviser* should provide you with at the start of your engagement. If you require a copy of this privacy notice, please contact your *adviser*.

### The personal data we collect and use

In the course of our monitoring, oversight and complaint handling activities we may collect the following personal data when you provide it to us:

- *contact information*
- *identity information*
- *financial information*
- *payment information*
- *employment status*
- *lifestyle information*
- *health information*

- data about criminal convictions or offences
- details of any *vulnerability*
- details of your dependents and/or beneficiaries under a policy (If you are providing information about another person we expect you to ensure that they know you are doing so and are content with their information being provided to us. You might find it helpful to show them

this privacy notice and if they have any concerns please contact us in one of the ways described below.)

- *product* details

### Information collected from other sources

We also obtain personal data from other sources in the course of our monitoring, oversight and complaint handling activities. Most of this information is provided to us by your *adviser*. It is their responsibility to make sure they explain that they will be sharing personal data with *Sesame* and, where necessary, ask permission before sharing information with us.

The personal data we obtain from other sources may include the following:

- From your *adviser* and/or their previous *network* or employer (if applicable):
  - *contact information*
  - *identity information*
  - *financial information*
  - *employment status*
  - *lifestyle information*
  - *health information*
  - data about criminal convictions or offences
  - details of any *vulnerability*
  - details of your dependents and/or beneficiaries under a policy
  - *product* details
- From *lenders* and/or *product providers*:
  - *product* details
  - *contact information*
  - *identity information*
  - *financial information*
  - *employment status*
- From identification and verification checking agencies:
  - *identity information*
  - *sanction check information*
- From tracing agents:
  - *contact information*

### How we use your personal data

The below table sets out:

- how we use your personal data
- the lawful bases upon which we collect and use your personal data
- who we routinely share your personal data with (some of these third party recipients may be based outside the European Economic Area — for further information including on how we safeguard your personal data when

this occurs, see 'Transfer of your information out of the EEA' below)

Rationale/Reason for Processing	Lawful Basis for Processing	Third party recipients linked to that activity
<ul style="list-style-type: none"> <li>• to manage complaints</li> </ul>	Compliance with a legal obligation	Your <i>adviser</i> The Financial Ombudsman Service The Financial Conduct Authority <i>Lender/product provider</i> Our professional indemnity insurers and insurance adviser Our external solicitors External consultants/advisers to assist in assessing complaints The Aviva group (our parent company)
<ul style="list-style-type: none"> <li>• to assess the suitability of any advice provided to you and/or the competency of your <i>adviser</i> in compliance with our monitoring and oversight obligations</li> </ul>	Compliance with a legal obligation	Your <i>adviser</i> The Financial Conduct Authority <i>Lender/product provider</i> Sesame Group India PVT Ltd External consultants/advisers to assist in assessing complaints The Aviva group (our parent company)
<ul style="list-style-type: none"> <li>• to trace your whereabouts to contact you about any advice provided to you</li> </ul>	Compliance with a legal obligation	Tracing agents
<ul style="list-style-type: none"> <li>• to retain records of any services or advice provided to you by your <i>adviser</i> in accordance with our regulatory obligations</li> </ul>	Compliance with a legal obligation	External supplier(s) of data storage and data hosting services to retain records on our behalf
<ul style="list-style-type: none"> <li>• to manage legal claims</li> </ul>	Legitimate interests – we have a legitimate interest in protecting our organisation from breaches of legal obligations owed to us and to defend ourselves from litigation. This is needed to ensure that our legal rights and interests are managed appropriately	Your <i>adviser</i> Our professional indemnity insurers and insurance adviser Our external solicitors The Aviva group (our parent company)
<ul style="list-style-type: none"> <li>• to detect, prevent and investigate fraudulent applications for <i>products</i></li> <li>• to undertake investigations into allegations of misconduct and/or criminal offences</li> <li>• to notify the relevant authorities of any suspicious activity following an investigation undertaken by us into allegations of misconduct and/or criminal offences</li> </ul>	Compliance with a legal obligation. We also consider that we have a legitimate interest in protecting our organisation, other parties and the financial services industry more widely in detecting, preventing and investigating financial crime and/or misconduct	Your <i>adviser</i> The Financial Ombudsman Service The Financial Conduct Authority <i>Lender/product provider</i> Our professional indemnity insurers and insurance adviser Our external solicitors Network/previous employer National Crime Agency (NCA) Police HMRC
<ul style="list-style-type: none"> <li>• to retain records of any services or</li> </ul>	Legitimate interests – we have	External supplier(s) of data storage and data hosting

<p>advice provided to you by your <i>adviser</i> in order to defend potential legal claims or complaints</p>	<p>a legitimate interest in defending <i>ourselves</i> from legal claims and complaints. This is needed to ensure that <i>our</i> legal rights and interests are managed appropriately</p>	<p>services to retain records on <i>our</i> behalf</p>
<ul style="list-style-type: none"> <li>to undertake anti-money laundering, identification and verification checks, including assessment of your <i>sanction check information</i> (any personal data obtained for the purposes of meeting with The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 will only be processed for the purposes of preventing money laundering or terrorist financing, unless the use of the data is permitted by or under another enactment other than those Regulations, or we have another lawful basis for processing it)</li> </ul>	<p>Compliance with a legal obligation</p>	<p>Sesame Group India Pvt Ltd External supplier(s) to conduct anti-money laundering, identification and verification checks on <i>our</i> behalf <i>Lender/product provider</i></p>
<ul style="list-style-type: none"> <li>to identify any commission or fee payments due to your <i>adviser</i> as a result of the service they have provided to you</li> </ul>	<p>Legitimate interests – we have a legitimate interest in being able to identify any commission or fee payments due your <i>adviser</i> as a result of the service they have provided to you in order that we can comply with <i>our</i> contractual obligations to them</p>	<p>Your <i>adviser</i> <i>Lender/product provider</i></p>
<ul style="list-style-type: none"> <li>to issue responses to press/news stories concerning services or advice provided to you by your <i>adviser</i> and/or complaints or legal claims made by you, in order to minimise the reputational impact on <i>Sesame</i></li> </ul>	<p>Legitimate interests – we have a legitimate interest in being able to issue responses to press/news stories concerning services or advice provided to you by your <i>adviser</i> and/or complaints or legal claims made by you, in order to minimise the reputational impact on <i>us</i></p>	<p>The Aviva group (<i>our</i> parent company)</p>
<ul style="list-style-type: none"> <li>to evidence satisfaction of any request made by you in accordance with your rights under <i>data protection regulation</i></li> </ul>	<p>Compliance with a legal obligation</p>	<p>Information Commissioner’s Office</p>
<ul style="list-style-type: none"> <li>to perform administrative tasks in relation to the above referenced uses of your data</li> </ul>	<p>Legitimate interests – we have a legitimate interest in transmitting personal data to other organisations within <i>our</i> group for centralised administration purposes</p>	<p>The Sesame Bankhall group</p>

## Special category data and criminal records data

Certain types of personal data are considered more sensitive and so are subject to additional levels of protection under data protection legislation. These are known as ‘special categories of data’ and include data concerning your health, racial or ethnic origin, genetic data and sexual orientation. Data relating to criminal convictions or offences is also subject to additional levels of protection.

In the course of *our* monitoring, oversight and complaint handling activities *we* may process:

- *health information* and *lifestyle information* provided by you to either *us* or to your *adviser* as part of any advice or application in relation to a protection insurance product; and/or
- criminal conviction or offence information provided by you to your *adviser* as part of any advice or application in relation to a general insurance product.

In addition to the lawful basis for processing this information set out in the above table, *we* will be processing it either (i) for the purpose of advising on, arranging or administering an insurance contract or (ii) for the establishment, exercise or defence of legal claims.

In the course of our activities relating to the prevention, detection and investigation of financial crime, *we* may process criminal conviction or offence information. Where *we* do so, in addition to the lawful basis for processing this information set out in the above table, *we* will be processing it for the purpose of compliance with regulatory requirements relating to unlawful acts and dishonesty.

## Whether information has to be provided by you, and if so why

*We* will tell you if providing some personal data is optional, including if *we* ask for your consent to process it. In all other cases you must provide your personal data in order for *us* to investigate and assess any complaint or legal claim made by you.

## How long your personal data will be 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:

Type of Record	Retention Period
Advice file containing a record of any services or advice provided to you by your <i>adviser</i>	For as long as <i>we</i> reasonably consider that: <ul style="list-style-type: none"> <li>• <i>we</i> may need to assess the suitability of any advice provided to you and/or the competency</li> </ul>

	of your <i>adviser</i> <ul style="list-style-type: none"> <li>• you might legally bring a claim against your <i>adviser</i> or <i>us</i></li> </ul>
Complaint file containing a record of any claim you have brought against your <i>adviser</i> or <i>us</i>	For as long as <i>we</i> reasonably consider that you might legally bring an additional or repeat claim against your <i>adviser</i> or <i>us</i>
Results of anti-money laundering, identification and verification checks, including assessment of your <i>sanction check information</i>	For as long as <i>we</i> are required/permitted to retain this personal data based upon <i>our</i> legal and regulatory obligations
Fraud and financial crime files	For as long as <i>we</i> reasonably consider that: <ul style="list-style-type: none"> <li>• <i>we</i> are required/permitted to retain this personal data based upon <i>our</i> legal and regulatory obligations</li> <li>• they may be required in the establishment, exercise or defence of legal claims</li> </ul>
Records of any commission or fee payments due to your <i>adviser</i> as a result of the service they have provided to you	For as long as <i>we</i> reasonably consider that <i>we</i> need to retain these for audit purposes
Records of satisfaction of any request made by you in accordance with your rights under <i>data protection regulation</i>	3 years from the date the request was satisfied

## Transfer of your information out of the EEA

*We* may transfer your personal data to the following which are located outside the European Economic Area (EEA) as follows:

- Sesame Group India Pvt Ltd, based in India. This is a company in the same group as *Sesame* which is used to:
  - assess the suitability of any advice provided to you and/or the competency of your *adviser* in compliance with *our* monitoring and oversight obligations
  - undertake anti-money laundering, identification and verification checks, including assessment of your *sanction check information*

India does not have the same data protection laws as the United Kingdom and EEA. Whilst the European Commission has not given a formal decision that India provides an adequate level of data protection similar to those which apply in the United Kingdom and EEA, any transfer of your personal data will be subject to a European Commission approved contract designed to help safeguard your privacy rights and give you remedies in the unlikely event of a misuse of your personal data.

- Suppliers and sub-contractors which provide services to *us*. If *we* do transfer your personal data to *our* suppliers and sub-contractors outside of the EEA, *we* will make sure that it is protected in a similar way as if it was being used in the EEA. *We'll* use one of these safeguards:
  - the transfer will be to a non-EEA country with privacy laws that give the same protection as the EEA
  - the transfer will be subject to a European Commission approved contract designed to help safeguard your privacy rights and give you remedies in the unlikely event of a misuse of your personal data
  - the transfer will be to organisations that are part of Privacy Shield (this is a framework that sets privacy standards for data sent between the US and EU countries and it makes sure those standards are similar to the standards used within the EEA)
  - the transfer will be subject to binding corporate rules (agreements governing transfers made between organisations within a corporate group)

You have a right to ask us for more information about any transfer of your personal data outside of the EEA, including the safeguards in place. To learn more, please see 'Your rights' below.

## Your rights

You have legal rights under *data protection regulation* in relation to your personal data. These are set out under the below headings:

- To access personal data
- To correct / erase personal data
- To restrict how *we* use personal data
- To object to how *we* use personal data
- To ask *us* to transfer personal data to another organisation
- To object to automated decisions
- To understand how *we* protect information transferred outside Europe
- To find out more about how *we* use personal data

*We* may ask you for proof of identity when making a request to exercise any of these rights. *We* do this to ensure *we* only disclose information where *we* know *we* are dealing with the right individual.

*We* will not ask for a fee, unless *we* think your request is unfounded, repetitive or excessive. Where a fee is necessary, *we* will inform you before proceeding with your request.

*We* aim to respond to all valid requests within one month. It may however take *us* longer if the request is particularly complicated or you have made several requests. *We* will always let you know if *we* think a response will take longer than one month. To speed up *our* response, *we* may ask you to provide more detail about what you want to receive or are concerned about.

*We* may not always be able to fully address your request, for example if it would impact the duty of confidentiality *we* owe

to others, or if *we* are otherwise legally entitled to deal with the request in a different way.

### **To access personal data**

You can ask us to confirm whether or not *we* have and are using your personal data. You can also ask to get a copy of your personal data from *us* and for information on how *we* process it.

### **To rectify / erase personal data**

You can ask that *we* rectify any information about you which is incorrect. *We* will be happy to rectify such information but would need to verify the accuracy of the information first.

You can ask that *we* erase your personal data if you think *we* no longer need to use it for the purpose *we* collected it from you.

You can also ask that *we* erase your personal data if you have either withdrawn your consent to *us* using your information (if *we* originally asked for your consent to use your information), or exercised your right to object to further legitimate use of your information, or where *we* have used it unlawfully or where *we* are subject to a legal obligation to erase your personal data.

*We* may not always be able to comply with your request, for example where *we* need to keep using your personal data in order to comply with *our* legal obligation or where *we* need to use your personal data to establish, exercise or defend legal claims.

### **To restrict our use of personal data**

You can ask that *we* restrict *our* use of your personal data in certain circumstances, for example

- where you think the information is inaccurate and *we* need to verify it;
- where *our* use of your personal data is not lawful but you do not want *us* to erase it;
- where the information is no longer required for the purposes for which it was collected but *we* need it to establish, exercise or defend legal claims; or
- where you have objected to *our* use of your personal data but *we* still need to verify if *we* have overriding grounds to use it.

*We* can continue to use your personal data following a request for restriction where *we* have your consent to use it; or *we* need to use it to establish, exercise or defend legal claims, or *we* need to use it to protect the rights of another individual or a company.

### **To object to use of personal data**

You can object to any use of your personal data which *we* have justified on the basis of our legitimate interest, if you believe your fundamental rights and freedoms to data protection outweigh *our* legitimate interest in using the information. If you raise an objection, *we* may continue to use the personal data if *we* can demonstrate that *we* have compelling legitimate interests to use the information.

### **To request a transfer of personal data**

You can ask us to provide your personal data to you in a structured, commonly used, machine-readable format, or you can ask to have it transferred directly to another *data controller* (e.g. another company).

You may only exercise this right where we use your personal data in order to perform a contract with you, or where we asked for your consent to use your personal data. This right does not apply to any personal data which we hold or process outside automated means.

#### ***To contest decisions based on automatic decision making***

If we made a decision about you based solely by automated means (i.e. with no human intervention), and the decision made by us produces a legal effect concerning you, or significantly affects you, you may have the right to contest that decision, express your point of view and ask for a human review. These rights do not apply where we are authorised by law to make such decisions and have adopted suitable safeguards in our decision making processes to protect your rights and freedoms.

#### ***To obtain a copy of our safety measures for transfers outside of Europe***

You can ask for a copy of, or reference to, the safeguards we have put in place when your personal data is transferred outside of the European Economic Area. We are not required to share details of these safeguards where sharing such details would affect our commercial position, or create a security risk.

#### ***You can contact us for more information***

If you are not satisfied with the level of information provided in this privacy notice, you can ask us about what personal data we have about you, what we use your information for, who we disclose your information to, whether we transfer it abroad, how we protect it, how long we keep it for, what rights you have, how you can make a complaint, where we got your data from and whether we have carried out any automated decision making using your personal data.

If you would like to exercise any of the above rights, please:

- email or write to our Data Protection Officer at [dataprivacy@sbg.co.uk](mailto:dataprivacy@sbg.co.uk) or Sesame Limited, Fourth Floor, Jackson House, Sibson Rd, Sale M33 7RR;
- let us have enough information to identify you, e.g. name, address, date of birth, your *adviser's* details;
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- let us know the information to which your request relates

## **Keeping your personal data secure**

We have appropriate security measures in place to prevent personal data from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal data to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable

regulator of a suspected data security breach where we are legally required to do so.

## **Data anonymization and aggregation**

Your personal data may be converted into statistical or aggregated data which can't be used to identify you, then used to produce statistical research and reports.

## **Our supervisory authority**

If you are not happy with the way we are handling your information, you have a right to lodge a complaint with the Information Commissioners Office ([www.ico.org.uk](http://www.ico.org.uk)).

We ask that you please attempt to resolve any issues with us before the ICO.

## **How to contact us**

Please contact our Data Protection Officer if you have any questions about this privacy notice or the information we hold about you.

If you wish to contact our Data Protection Officer, please send an email to [dataprivacy@sbg.co.uk](mailto:dataprivacy@sbg.co.uk) or write to Sesame Limited, Fourth Floor, Jackson House, Sibson Rd, Sale M33 7RR.

## Glossary of Terms

<b>Sesame, we, us or our</b>	Sesame Limited, a company registered in England and Wales (company number 2844161). Sesame Limited is authorised and regulated by the Financial Conduct Authority. Sesame Limited's Financial Services Register number is 150427.	<b>network</b>	any company which your <i>adviser</i> was an appointed representative of prior to your <i>adviser</i> joining <i>Sesame</i> or which they become an appointed representative of after leaving <i>Sesame</i> (a network is the company responsible for making sure that sales your <i>adviser</i> makes to you and advice your <i>adviser</i> gives to you are compliant with the rules and regulations that apply to financial services in the UK)
<b>adviser</b>	your mortgage/protection/general insurance adviser and/or their advisory firm	<b>payment information</b>	this is information that can be used to make redress/compensation payments to a person, such as bank account number, sort code and bank branch address
<b>contact information</b>	these are details that can be used to contact a person, including title, first name, surname, personal telephone number, fax, email address, home address, country, postcode or city of residence. This may also include work contact information such as work telephone number, fax, work email and work address	<b>product</b>	this is the mortgage, protection and/or general insurance product in respect of which your <i>adviser</i> has (i) provided you with advice, (ii) applied for a decision in principle or quotation for and/or (iii) arranged or administers on your behalf
<b>data controller</b>	means a natural or legal person (such as a company) which determines the means and purposes of processing of personal data. For example, <i>Sesame</i> is your data controller as we determine how we will collect personal data from you, the scope of data which will be collected, and the purposes for which it will be used	<b>product provider</b>	a company which provides protection and/or general insurance products
<b>data protection regulation</b>	applicable data privacy and protection laws	<b>sanction check information</b>	this is information relating to your politically exposed persons (PEPs) status and Her Majesty's Treasury financial sanctions status, which is recorded to prevent fraud and money laundering
<b>employment status</b>	this is information about your work, if you are employed, self-employed, unemployed, a student or on job seeker allowance	<b>vulnerability</b>	a vulnerable consumer is someone who, due to their personal circumstances, is especially susceptible to detriment, particularly when an advisory firm is not acting with appropriate levels of care. These customers are more likely to suffer severe detriment if something goes wrong. Details of vulnerability fall in to the following categories: health; resilience (financial); life events; and capability (financial knowledge/confidence)
<b>financial information</b>	this is information relating to your financial status, including salary/income, outgoings/expenditure and tax status		
<b>health information</b>	this is information relating to your medical history, including symptoms, diagnoses, procedures and outcomes, as well as information about your height and weight. This could include previous and current or persistent medical conditions and family medical history		
<b>identity information</b>	this is any information that can be used to distinguish a person or verify their identity, such as name, date of birth, place of birth, gender, marital status, national identity card/number, passport, drivers licence and national insurance number		
<b>initial disclosure document</b>	the insurance or mortgage disclosure document given to you by your <i>adviser</i>		
<b>lenders</b>	a mortgage lender and/or specialist mortgage distributor providing us with access to specialist lenders		
<b>lifestyle information</b>	this includes both work and leisure behaviour patterns. Most relevant to your <i>products</i> may be your smoker status, alcohol consumption, health, retirement age and exercise habits		