



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.

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
to manage complaints	Compliance with a legal obligation	Your <i>adviser</i> The Financial Ombudsman Service The Financial Conduct Authority <i>Lender/product provider</i> <i>Our</i> professional indemnity insurers and insurance adviser <i>Our</i> external solicitors External consultants/advisers to assist in assessing complaints The Aviva group (<i>our</i> parent company)
to assess the suitability of any advice provided to you and/or the competency of your <i>adviser</i> in compliance with <i>our</i> monitoring and oversight obligations	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 (<i>our</i> parent company)
to trace your whereabouts to contact you about any advice provided to you	Compliance with a legal obligation	Tracing agents
to retain records of any services or advice provided to you by your <i>adviser</i> in accordance with <i>our</i> regulatory obligations	Compliance with a legal obligation	External supplier(s) of data storage and data hosting services to retain records on <i>our</i> behalf
to manage legal claims	Legitimate interests – we have a legitimate interest in protecting <i>our</i> organisation from breaches of legal obligations owed to <i>us</i> and to defend <i>ourselves</i> from litigation. This is needed to ensure that <i>our</i> legal rights and interests are managed appropriately	Your <i>adviser</i> <i>Our</i> professional indemnity insurers and insurance adviser <i>Our</i> external solicitors The Aviva group (<i>our</i> parent company)
- to detect, prevent and investigate fraudulent applications for <i>products</i> - to undertake investigations into allegations of misconduct and/or criminal offences - to notify the relevant authorities of any suspicious activity following an investigation undertaken by <i>us</i> into allegations of misconduct and/or criminal offences	Compliance with a legal obligation. We also consider that we have a legitimate interest in protecting <i>our</i> 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> <i>Our</i> professional indemnity insurers and insurance adviser <i>Our</i> external solicitors <i>Network/previous employer</i> National Crime Agency (NCA) Police HMRC
to retain records of any services or advice provided to you by your <i>adviser</i> in order to defend potential legal claims or complaints	Legitimate interests – we have 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	External supplier(s) of data storage and data hosting services to retain records on <i>our</i> behalf
to undertake anti-money laundering, identification and verification checks, including assessment of your <i>sanction check information</i> (any personal data	Compliance with a legal obligation	Sesame Group India Pvt Ltd External supplier(s) to conduct anti-money laundering, identification and verification checks on <i>our</i> behalf

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 <i>we</i> have another lawful basis for processing it)		<i>Lender/product provider</i>
to identify any commission or fee payments due to your <i>adviser</i> as a result of the service they have provided to you	Legitimate interests – <i>we</i> 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 <i>we</i> can comply with <i>our</i> contractual obligations to them	<i>Your adviser</i> <i>Lender/product provider</i>
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>	Legitimate interests – <i>we</i> 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>	The Aviva group (<i>our</i> parent company)
to evidence satisfaction of any request made by you in accordance with your rights under <i>data protection regulation</i>	Compliance with a legal obligation	Information Commissioner's Office
to perform administrative tasks in relation to the above referenced uses of your data	Legitimate interests – <i>we</i> have a legitimate interest in transmitting personal data to other organisations within <i>our</i> group for centralised administration purposes	The Sesame Bankhall group

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 we reasonably consider that: - we may need to assess the suitability of any advice provided to you and/or the competency of your <i>adviser</i> - you might legally bring a claim against your <i>adviser</i> or us
Complaint file containing a record of any claim you have brought against your <i>adviser</i> or us	For as long as we reasonably consider that you might legally bring an additional or repeat claim against your <i>adviser</i> or us
Results of anti-money laundering, identification and verification checks, including assessment of your <i>sanction check information</i>	For as long as we are required/permitted to retain this personal data based upon our legal and regulatory obligations
Fraud and financial crime files	For as long as we reasonably consider that: - we are required/permitted to retain this personal data based upon our legal and regulatory obligations - they may be required in the establishment, exercise or defence of legal claims
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 we reasonably consider that we 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 in a corporate group)

You have a right to ask us for more information about the safeguards we have put in place as mentioned above. 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 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).

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 or write to Sesame Limited, Fourth Floor, Jackson House, Sibson Rd, Sale M33 7RR.

Glossary of Terms

Sesame, we, us or our	Sesame Limited, a company registered in England and Wales (company number 2844161) whose registered office is at Pixham End, Dorking, Surrey RH4 1QA. Sesame Limited is authorised and regulated by the Financial Conduct Authority. Sesame Limited's Financial Services Register number is 150427.	network	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)
adviser	your mortgage/protection/general insurance adviser and/or their advisory firm	payment information	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
contact information	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	product	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
data controller	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	product provider	a company which provides protection and/or general insurance products
data protection regulation	applicable data privacy and protection laws	sanction check information	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
employment status	this is information about your work, if you are employed, self-employed, unemployed, a student or on job seeker allowance	vulnerability	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)
financial information	this is information relating to your financial status, including salary/income, outgoings/expenditure and tax status		
health information	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		
identity information	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		
initial disclosure document	the insurance or mortgage disclosure document given to you by your <i>adviser</i>		
lenders	a mortgage lender and/or specialist mortgage distributor providing us with access to specialist lenders		
lifestyle information	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		