

Data Retention for Clients & Other Third Parties

JULY 2023



What personal information we use and how long we keep it

This document is to broadly define how long the Data Controllers* within the Curtis Banks group of companies will retain personal data under the United Kingdom General Data Protection Regulations (UK-GDPR) and the Data Protection Act 2018.

The nature of pensions is that data will usually be held for an extensive period of time given the long-term nature of the contract in place. The retention details set out below are the timeframes for which we would hold data, as standard. Please note that we may keep your personal data for a longer period of time in the event of ongoing complaints, legal claims or where required to do so by law.

If you have concerns about how we process your personal data, you can contact the Information Commissioner's Office on 0303 123 1113 or visit their website at www.ico.org.uk/concerns.

Accessing our services

If you experience difficulties accessing any of our services due to personal circumstances, we may be able to make some adjustments to help you. Please contact our SIPP Support Team on 01473 296 969 or sippsupportteam@curtisbanks.co.uk to discuss any support adjustments that may be available to you.

Type of Data	Retention Period
Personal Data and Special Category Data received via paper, electronic means (e.g. email or online application) or verbally	<p>Upto 15 years from the date of the last activity. Examples of last activity include, but are not limited to:</p> <ul style="list-style-type: none"> When a transfer out to a new scheme has finalised. When a plan depletion is finalised (such as via flexi-access drawdown). When a plan is formally closed after being considered bankrupt. A bankrupt plan no longer contains any assets (i.e. cash, equities, commercial property etc.) with an associated value and is not likely to realise a value in the future. From the date a complaint/legal matter is closed if this is later than the plan closing date. Where you are a property tenant, the data will be retained for 14 years from the date of the last activity on the SIPP that held the property you leased. This means your data may be held for longer than 14 years so we can maintain a full record for an active or recently closed SIPP or SSAS.
Personal data processed for regulatory returns (e.g. to the PRA or the FCA)	Indefinitely with the exception of the HMRC Relief At Source Annual Information Return, which will be retained for 7 years.
Personal Data or Special Category Data where you did not proceed with establishing a SIPP/SSAS contract with the group (known as a 'Prospect record')	<p>12 months from the data of the last activity. Examples of last activity include, but are not limited to:</p> <ul style="list-style-type: none"> When we returned an application to you as it was no longer proceeding. When we generated a key features illustration for you. If initial due diligence is required on a SSAS prior to transfer-in, 12 months from the date Curtis Banks issues you with confirmation (by letter, telephone or electronic means) that we are not willing to proceed with the transfer.

* Data Controllers within the group include Curtis Banks Group plc, Curtis Banks Limited, Suffolk Life Annuities Limited, Suffolk Life Pensions Limited (also trades as Curtis Banks Pensions), SLA Property Company Limited and Suffolk Life Group Limited. A full list of the Data Controllers within the group can be found on the Information Commissioner's Office website at: <https://ico.org.uk/esdwebpages/search>.





Notes

Curtis Banks Group plc,
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Bristol, BS1 6DZ

T 0117 910 7910
F 0117 929 2514
curtisbanks.co.uk

Call charges will vary. We may record and monitor calls.

If you're contacting us by email, please remember not to send any personal, financial or banking information because email is not a secure method of communication.

Curtis Banks Group plc (registered number 07934492) and Curtis Banks Limited (registered number 06758825) are companies registered in England & Wales with their registered addresses at 3 Temple Quay, Bristol BS1 6DZ. Curtis Banks Limited is authorised and regulated by the Financial Conduct Authority (number 492502).

Curtis Banks Pensions is a trading name of Suffolk Life Pensions Limited. Suffolk Life Pensions Limited is a company registered in England & Wales (registered number 1180742) and is authorised and regulated by the Financial Conduct Authority (number 116298). Suffolk Life Annuities Limited is a company registered in England & Wales (registered number 1011674) and is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority (number 110468). The registered address of both companies is 153 Princes Street, Ipswich, Suffolk IP1 1QJ.
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