

# GENERAL DATA PROTECTION REGULATION GDPR STATEMENT

APRIL 2018



## Background

*The Curtis Banks Group and subsidiaries administer SIPP, SSAS and similar self-invested products in the United Kingdom. The Group takes its personal information protection and data security responsibilities seriously; we are committed to protecting and enhancing the rights given to all data subjects for which we obtain, process and protect data in accordance with the General Data Protection Regulation (GDPR).*

## Summary

The Curtis Banks Group welcomes the introduction of GDPR. Under this new regulation the Curtis Banks Group continues to be both a Data Controller and Data Processor of personal data - this includes both personally identifiable information and special category information which is collected in certain specific circumstances.

We have undertaken extensive work to prepare for the introduction of GDPR on 25 May 2018. Ahead of this date all relevant Curtis Banks Group companies will provide documentation, including a privacy information notice, to clients and other relevant data subjects detailing their obligations to each data subject, their rights and the data stored.

## Assessment

The Curtis Banks Group collects personal data in order to perform its contractual obligations and in accordance with regulatory and compliance requirements for the business activities we undertake. We collect, process and use only the minimum data required to fulfil our obligations and undertake our business activities. Data may be shared within the Curtis Banks Group to fulfil our contractual obligations, and externally to fulfil additional contractual and regulatory obligations.

In accordance with GDPR, the Curtis Banks Group has appointed a Data Protection Officer (DPO) to oversee the implementation of GDPR in the group and also to monitor our ongoing compliance with the regulation alongside the Group's Compliance and Risk function.

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## Commitment

With the requirements of GDPR and under our ongoing commitment to collect, hold and process your personal data responsibly we are committed to:

- Processing your data in accordance with the legal basis for which the data was originally collected;
- Ensuring that the personal data we hold is accurate and that there are processes in place to rectify any inaccuracies promptly;
- Maintaining robust security systems and controls to protect your personal data against unauthorised access, processing, loss or accidental destruction;
- Maintaining robust governance systems, operational procedures and ongoing staff training to maintain compliance with all data protection legislation.

## Activity

- Curtis Banks Group will amend its activities and associated policies and procedures as necessary in order to fully comply with GDPR following a thorough assessment.
- Curtis Banks Group will amend customer and third party contracts to ensure the GDPR reaches all relevant areas associated with the business activities of the group.
- Curtis Banks Group will review all of its own and third party contracts, amending where necessary, for compliance with GDPR.
- Curtis Banks Group has carried out a Data Protection Impact Assessment; and will undertake assessments in future when any of our products, services, processes etc. change.
- Curtis Banks Group will write to data subjects, where relevant, to explain more about GDPR and to provide our updated privacy information notice.
- Curtis Banks Group have supplemented existing training modules with GDPR specific content, encouraging staff to embrace the requirements and practises required under GDPR.