

Security and Privacy Policy

This legal document sets out how Sesame Bankhall Group handles data that identifies you. You should read it in conjunction with the Sesame Bankhall Group Website Terms and Conditions of which this Privacy Policy forms part. You also provide us with information off-line, which is governed by separate terms and conditions and data protection policies.

At Sesame Bankhall Group, we believe strongly in protecting the privacy of our users' personal information. This statement describes the privacy practices we apply to the Sesame Bankhall Group websites and microsites. As part of that, it also expresses our approach to complying with the data protection laws that apply in the United Kingdom. If we change this Privacy Policy, we will notify you of the changed document in the same way as we notify changes to the Sesame Website Terms and Conditions.

If you have questions or concerns regarding this statement, you should contact our helpdesk on our usual telephone numbers.

1. The information we collect

- **Registration Information** - When you register on the Sesame Bankhall websites, you may have to provide your name, FSA number, your email address, and some optional notes about yourself ("Registration Information"). They are available to you, and capable of being changed.
- **Cookies** - We use "cookies". Our websites use cookies as follows:
 - To hold visitor's login information
 - To facilitate optimal use of websites by means of a temporary "session" cookie. These cookies disappear when the Member's browser session ends.
 - Permanent cookies to enable you to automatically log on and direct you to content that have been highlighted to you.
 - Temporary cookies are used to gather anonymous statistics. No personally identifiable information is gathered as part of this process.
- **Log files** - Like most standard Web site servers we use log files. This includes internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, platform type, date/time stamp, and number of clicks to analyse trends, administer the site, track user's movement in the aggregate, and gather broad demographic information for aggregate use. IP addresses, etc. are not linked to personally identifiable information. (IP addresses are tied to personally identifiable information to enable our Web-based service).
- **Email addresses** - We make your e-mail address available to other members of the Sesame Bankhall and PMS propositions and in some instances we make it available to product providers. If you do not want your e-mail address given to other members of the Bankhall and PMS propositions or to product providers and other carefully selected third party suppliers please call our Contact Centre or your usual helpdesk who will be happy to help you opt-out of one or more of these facilities.

2. Sharing and use of information

The over-riding principle we apply is that we supply your personal data to product providers so that you can transact business with them and so that you are identified for the receipt of commissions. However, we do not sell lists of our Members' email addresses to other third parties. We may pass your details to a third party if you request a product from a third party supplier through the Sesame, Bankhall or PMS buying clubs.

- **Email addresses** - We do not directly make your email address available to anyone on any screen on the Sesame, Bankhall and PMS Websites and microsites. The only legitimate way of making contact with you is from Product Providers and via third party suppliers through the Sesame buying club.
- **Advertising** - The Sesame, Bankhall and PMS website and their microsites may include interactive advertising for other businesses. We may use, and provide to third parties, anonymised demographic data provided by Members of the Sesame, Bankhall and PMS propositions to target this advertising more appropriately.
- **Newsletters** - We have regular and occasional emails, which all members of Sesame, Bankhall and PMS propositions receive, typically these will be compliance bulletins, research if you take that and other materials relevant to your contract as a member of the Sesame, Bankhall and PMS propositions.
- **Companies in the Sesame Bankhall Group** - We may share data supplied by you (or collected about you) with our subsidiaries and other companies in our group, but only for the purposes described in this policy and Sesame Bankhall Group Website Terms and Conditions.
- **Changes in Sesame Bankhall businesses** - If the businesses of Sesame Bankhall Group Limited are transferred to other legal entities or are acquired by a third party, we may transfer personal data we then hold to that party.
- **Place of processing** - The personal information held by us is held on and processed by computers situated in the United Kingdom.

3. Security

We have security measures in place to protect our customer database and access to this database is under strict guidelines. However, it remains each Member's responsibility:

- to protect against unauthorised access to its website access details;
- to ensure against use by anyone else of the Sesame, Bankhall and PMS websites and microsites through the machine that Member uses while they are "logged on" to the Sesame, Bankhall and PMS websites and/or microsites;
- to log off or exit from the Sesame, Bankhall and PMS website and/or microsites when not using it; and
- to keep his/her password secret.

4. Opt-out policy

- You may have your registration details removed from our Websites at any time. To remove yourself please call our Contact Centre or your helpdesk and they will tell you how we remove Your Details.
- We provide Members with the opportunity not to receive e-mailed Newsletters and other correspondence that they have previously opted to receive. This opt-out can be effected by calling our Contact Centre or your helpdesk.

5. Disclosure for legal reasons

We reserve the right to communicate such of a Member's personal information as we hold to third parties which seek the disclosure of it, and which make a legally-compliant request for its disclosure.

6. Contacting Sesame, Bankhall and PMS

If you have any questions about this privacy statement, the practices of this site, or your dealings with Sesame Bankhall Group, you should call our Contact Centre or your helpdesk. You can also call our Contact Centre to get a copy of the personal data we hold about you or a description of that data. Please note that by English law we are entitled to charge you a small sum for providing this information.

If you change any of your personal details or you want us to correct any personally identifiable information you should call our helpdesk and it will endeavour to make the changes you request.

7. Links to third party sites

Our site contains links to other sites. Sesame Bankhall Group is not responsible for the privacy practices, or the content, of those web sites.

8. Data Protection Information

You can obtain further information about data protection laws by visiting the Information Commissioner's website at www.ico.gov.uk. You can search for our Data Protection Notification there, should you so wish.

9. Changes to this Privacy Policy

If we change our privacy policy, we will post those changes to our homepage and any other place we deem appropriate. After we have posted changes, if you use the Sesame, Bankhall and PMS websites or any microsite within them you will be bound by the terms of change to our new privacy policy.

10. What Else you Should Know about Privacy?

Remember to close your browser when you have finished your user session. This is to ensure that others cannot access your personal information and correspondence if you

share a computer with someone else or are using a computer in a public place like a library or Internet cafe. You as an individual are responsible for the security of, and access to, your own computer.

Please be aware that whenever you voluntarily disclose personal information over the Internet that this information can be collected and used by others. In short, if you post personal information in publicly accessible online forums, you may receive unsolicited messages from other parties in return. Please be careful and responsible whenever you are using the Internet.

11. Bankhall Online and PMS Online

This part of the Privacy Policy applies when you access the Bankhall Online website via www.bankhall.co.uk or the PMS Online website via www.premiermortgageserviceonline.com (the "Portal").

You and we agree to comply with our respective obligations under data protection and privacy laws. You are data controller and we are data processors of the data you pass to us. You warrant that you can pass your client's data to us and product providers for processing on Bankhall Online and particularly via Adviser Hub. We will process that data in accordance only with your instructions. We may only use the data outside of your instructions to comply with our legal responsibilities or upon receipt of a legally valid request from your regulators and other appropriate authorities.

We warrant that we have technical and organisational measures in place to protect personal data and keep it secure and safe from accidental loss, destruction and damage.

We warrant that we have taken reasonable steps to ensure the reliability of our employees you may have access to the personal data you submit via Bankhall Online and Adviser Hub.

You acknowledge that you may send the personal data to third parties for them to supply you with quotes and other products and services that may be suitable for you clients and therefore we are not liable for the loss, damage or destruction of personal data you load or any message you send to third parties.