

# Cushon Group Limited Privacy and Cookie Notice

May 2023

# Cushon Group Limited Privacy Notice

This Privacy Notice was last revised on 30 May 2023.

## 1. Who we are

This notice ("the Privacy Notice") applies to all information we collect, use and process about you as a customer in relation to the products/services you receive from us.

"Cushon", "Better with Money" and "Creative" are trading names of the group of companies owned by Cushon Holdings Limited ("the Cushon Group"). Cushon Holdings Limited is a company registered in England and Wales with company number 14213564.

More information about the Cushon Group can be found on our website at [www.cushon.co.uk](http://www.cushon.co.uk).

In this notice, references to "we", "us" or "our" are references to one or more companies in the Cushon Group. Our address is Stephenson House, 2 Cherry Orchard Road, Croydon CR0 6BA and our Data Protection Officer can be contacted at [dpo@cushon.co.uk](mailto:dpo@cushon.co.uk).

Depending on the products or services you receive from us, one or more of the below Cushon Group companies will be the relevant data controller in respect of personal information that we process about you in connection with our business (including the products and services that we provide):

- Cushon Group Limited – a company registered in England and Wales with company number 10967805
- Cushon Money Limited – a company registered in England and Wales with company number 11112120
- Better with Money Limited – a company registered in England and Wales with company number 09943881
- Creative Benefit Solutions Limited – a company registered in England and Wales with company number 06293305
- Creative Auto-Enrolment Limited – a company registered in England and Wales with company number 08554978

Please check the terms and conditions of your product or service to confirm who the relevant data controller will be.

In some situations, Cushon MT Limited (a company registered in England and Wales with company number 12366412) and Cushon MT NI Limited (a company registered in Northern Ireland with company number NI040179) act as data processors on behalf of the Trustees of the Master Trusts. The privacy notice of the Trustees, in their capacity as data controller, can be found [here](#).

## 2. Why we are providing this Privacy Notice to you

We respect individuals' rights to privacy and to the protection of personal information. As a provider of savings products, we hold certain information about you and this is your personal data. Personal data means information about a living individual who can be identified by that information (either by itself or when it is combined with other information).

We are required by law to give you specified information about the personal data we hold about you, how we use it, and the safeguards that are in place to protect it. This Privacy Notice is designed to give you that information.

### 3. The information we process

We currently collect and process various categories of personal data and confidential information at the start of, and for the duration of, your relationship with us and beyond (subject to appropriate retention periods set out at section 5 below). We will limit the collection and processing to information necessary to achieve one or more legitimate purposes as identified in this Privacy Notice.

Personal data processed by us may include:

- Basic customer information such as name and address, date of birth, contact details, nationality, the fact that you are our customer;
- Financial information, including account and benefits information;
- Information about your employment;
- Information about your financial circumstances;
- Information about your use of our app or website;
- Background checks; and
- Information about your communications with us.

We may also process certain special categories of personal data (including details about your race or ethnicity or information about your health) where strictly necessary for completing specific activities related to our services. We will only process special categories of personal data where we've obtained your explicit consent or are otherwise lawfully permitted to do so.

Where permitted by law we may process information about criminal convictions, criminal offences, related security details, alleged offences including unproven allegations, spent or previous convictions, or other details provided in relation to a criminal reference check or similar. We process this information for specific purposes, such as detecting and preventing fraud and financial crime, where it is in the wider public interest (for example, to protect customers' economic wellbeing), or to make our services accessible to customers or for reporting of complaints for regulatory purposes.

### 4. How we get the personal information and why we have it

Most of the personal information we process is provided to us directly by you.

We also receive personal information about you indirectly, from the following sources in the following scenarios:

- Your employer when enrolling you for employment-related benefits; and
- Identity and background check providers.

We use the information that you have given for the purposes of:

- Provision and management of accounts;
- Provision and management of the Cushon website and app;
- Supply of products and services, including personalisation;
- Calculating, securing and paying benefits;
- Sending newsletters, providing resources, and maintaining a blog;

- Responding to communications;
- Marketing;
- Market research;
- Prevention and detection of fraud or other criminal activities; and
- Website analytics.

We may share this information with:

- Your employer;
- Natwest Group plc and members of its group;
- Third-party suppliers (or potential suppliers), who provide services on our behalf;
- Purchasers and potential purchasers of our businesses, including joint venture partners;
- Law enforcement and investigative authorities;
- Courts, regulators, government bodies and similar organisations as required by law (such as the FCA, PRA, HMRC or Health & Safety Executive or local equivalents);
- Corporate auditors and legal or other advisors; and
- Professional advisors.

We will not share your information with other third parties unless:

- We have your permission;
- Where required, whether directly or indirectly, for your product or service, which could include in relation to your welfare or accessibility requirements;
- With law enforcement agencies, judicial bodies, government entities, tax authorities or regulatory or trade bodies;
- Where required for a proposed or actual sale, reorganisation, transfer, financial arrangement, asset disposal or other transaction relating to our business and/or assets held by our business where such data is shared with a third party it is done under strict duties of confidentiality; and
- Where permitted by law, it is necessary for our legitimate interests or those of a third party, and it is not inconsistent with the purposes listed in this Privacy Notice.

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

**(a) Your consent.** You are able to remove your consent at any time. You can do this by contacting the Data Protection Officer at [dpo@cushon.co.uk](mailto:dpo@cushon.co.uk)

**(b) We have a contractual obligation.**

**(c) We have a legal obligation.**

**(d) We have a legitimate interest.**

Further details of all the processing activities are included in the Schedule of Processing Activities at Schedule A.

## Automated processing

We do not generally make decisions based solely on automated decision-making within the meaning of UK GDPR. In the event that we rely solely on automated decision-making that could have a significant impact

on you, we will provide you an opportunity to express your views and will provide any other safeguards required by law.

## 5. How we store your personal information

Your information is securely stored and encrypted both in transit and at rest. It may only be accessed on a need-to-know basis for the purposes set out in this Privacy Notice.

We manage our records to help us to serve our customers well (for example for operational reasons, such as dealing with any queries relating to your account) and to comply with legal and regulatory requirements. Records help us demonstrate that we are meeting our responsibilities and to keep as evidence of our business activities.

Retention periods for records are determined based on the type of record, the nature of the activity, product or service, and the applicable legal or regulatory requirements. We will then dispose your information through secure deletion, if held in electronic format, or secure destruction, if held in physical format.

We may on exception retain your information for longer periods, particularly where we need to withhold destruction or disposal based on an order from the courts or an investigation by law enforcement agencies or our regulators. This is intended to make sure that we will be able to produce the records as evidence, if they are needed.

## 6. Transferring your data outside the UK or EEA

We will store your personal data mainly in the UK or European Economic Area (EEA). In extremely limited circumstances we transfer personal data to third countries (e.g. USA).

When we do send personal data abroad, we do so using appropriate safeguards. This includes standard contractual clauses approved for use by the UK Information Commissioner's Office ("ICO"), eventually supplemented with additional measures. We can also use other suitable safeguards, such as adequacy decisions or approved Binding Corporate Rules from our vendors, to permit personal data transfers from the United Kingdom or the European Economic Area ("EEA") to other countries, in accordance with the applicable laws.

You can request further information regarding international data transfers of your personal data by contacting us using the contact details included below in this Privacy Notice.

## 7. Your data protection rights

Under data protection law, you have rights including:

**Your right of access** - You have the right to ask us for copies of your personal information.

**Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

**Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.

**Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

**Your right to object to processing** - You have the right to object to the processing of your personal information in certain circumstances.

**Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You can exercise your rights at any time by contacting us using the contact details included below in this Privacy Notice.

We respond to all requests we receive from users in accordance with applicable data protection laws. We may ask you to provide proof of identity before we can answer the above requests. In some cases, we may reject requests for certain reasons (for example, if the request is unlawful or if it may infringe on trade secrets or intellectual property or the privacy of another individual). The reason for rejection of the request will be communicated within one calendar month after the request is made.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive.

We try to respond to all legitimate requests within one calendar month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Please note that in some cases, if you do not agree to the way we process your information, it may not be possible for us to continue to operate your account and/or provide certain products and services to you.

## 8. Cookies

As you interact with our website, we will automatically collect data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies. Please see our cookie notice below for further information on how we use cookies and similar technology.

# Cushon Group Limited Cookie Notice

This Cookie Notice was last revised on [date] May 2023.

## 8.1 Who we are

This notice ("the Cookie Notice") applies to all information we collect, use and process about you while browsing our website or accessing your personal account with us.

"Cushon" is a trading name of the group of companies owned by Cushon Holdings Limited ("the Cushon Group"). Cushon Holdings Limited is a company registered in England and Wales with company number 14213564.

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Depending on how you use of our website, one or more of the below Cushon Group companies will be the relevant data controller in respect of personal information that we process about you in connection with our website:

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- Creative Auto-Enrolment Limited – a company registered in England and Wales with company number 08554978

## 8.2 Why we are providing this Cookie Notice to you

We respect individuals' rights to privacy and to the protection of personal information. As you interact with our website, we will automatically collect data about your equipment, browsing actions, and patterns. We collect this personal data by using cookies and other similar technologies.

This Cookie Notice contains information regarding what type of cookies we might place on your device when browsing our website and how we use them. You can find further information on how we process your personal data in our Privacy Notice.

## 8.3 What are cookies?

A cookie is a small piece of data (text file) that a website stores on your device in order to remember information about you, such as your language preference or login information. Cookies are not stored on your device unless you provide your consent. Those cookies are set by us and called first-party cookies. We also use third-party cookies – which are cookies from a domain different from the domain of the website you are visiting – for advertising and marketing purposes.

We use cookies and other tracking technologies for different purposes, including providing and improving our services, ensuring our website is secure, and recognising you when you visit our website. Additionally, some cookies might collect information about your browsing history or purchasing behaviour when you access our website, including information about pages viewed, products purchased, and your journey around the website.

We do not use cookies to collect or record information such as your name, address, or contact details.

UK privacy regulations require that your consent is obtained for the use of all cookies except those that are necessary for the site to provide you with information and services you request (so-called "strictly necessary cookies").

Below in section 5 of this Cookie Notice is a detailed list of the cookies that may be used by our site if you choose to allow cookies.

We use the following cookies:

- **Necessary cookies.** These cookies enable core functionality such as security, network management, and accessibility. You may disable these by changing your browser settings, but this may affect how the website functions.
- **Analytics cookies.** This is a set of tools used to collect and analyse anonymous usage information, enabling us to better understand how our site is used and to improve our website and the products and services offered through it.
- **Communication cookies.** These cookies enable us to offer immediate support if you need it. The webchat service use cookies to gather the required information.
- **Marketing cookies.** These cookies are to help us improve the relevancy of personalised advertising campaigns you receive. If this box is unchecked, you will still see adverts but they may not be relevant to your interests.

## 8.4 How long do cookies stay in your device?

The length of time that a cookie remains on your computer or mobile device depends on whether it is a "persistent" or "session" cookie. Session cookies last until you stop browsing and persistent cookies last until they expire or are deleted. Most of the cookies we use are persistent and will expire at a point between 30 minutes and two years from the date they are downloaded to your device.

## 8.5 Cookies list

Name of cookie	Purpose	Cookie type	Third party / First party	Duration
Cushon	We use this to remember information across different pages as you navigate around our site. For example, so we remember who you are after you've logged into your account, and to remember which investment product you have selected when you choose to set up an account.	Necessary	First Party	2 Days
consentedToCookies	We use this to track whether you have consented to cookies.	Necessary	First Party	90 days
Google Analytics _gid	This is provided by Google to help us keep track of how	Functional	Third Party	24 hours



	you are using the site.			
Google Analytics _ga	This is provided by Google to help us keep track of how you are using the site.	Functional	Third Party	5 weeks
Google Analytics _gat	This is provided by Google to manage the rate at which page views are submitted to its servers.	Functional	Third Party	1 Day
HubSpot tracking code _hstc	The HubSpot tracking code allows us to track website traffic.	Functional	Third Party	180 Days
Hubspot _hssc _hssrc	The HubSpot tracking code allows us to track website traffic.	Functional	Third Party	1 year
Facebook pixel	This is provided by Facebook to help us deliver interest-based promotional marketing content.	Functional	Third Party	90 Days
Facebook _fbp, fr, _fbc, _js_reg_fb_ref, reg_fb_ref, sb	These cookies are provided by Facebook as part of their embedded services on our website (likes, share etc.), for identification and to deliver ad products.	Functional	Third Party	90 Days
LinkedIn lms_ads, lms_analytics, li_fat_id,	Used to identify or make a probabilistic match of LinkedIn Members on and off LinkedIn for advertising and analytics.	Functional	Third Party	30 Days
LinkedIn li_sugr	Used to identify or make a probabilistic match of LinkedIn Members on and off LinkedIn for advertising and analytics.	Functional	Third Party	90 Days
LinkedIn Ln_or	Used to determine if Oribi analytics can be carried out on a specific domain	Functional	Third Party	1 Day

LinkedIn UserMatchHistory, AnalyticsSyncHistory	These cookies are provided by LinkedIn to record advertisement analytics.	Functional	Third Party	30 Days
Twitter tfw_exp	These cookies are provided by Twitter to integrate social sharing capabilities.	Functional	Third Party	14 Days
Twitter personalization_id,	These cookies are provided by Twitter to integrate social sharing capabilities.	Functional	Third Party	2 Years
HotJar _hjAbsoluteSessionInProgress _hjFirstSeen _hjSession	This is a Hotjar cookie used to count how many times different users visit the site. It assigns the users an ID, so the user does not get registered twice.	Functional	Third Party	30 mins
HotJar _hjIncludedInSessionSample	Set to determine if a user is included in the data sampling defined by your site's daily session limit.	Functional	Third Party	30 mins
HotJar _hjSessionUser	This is a Hotjar cookie that's set when a user first lands on a page with the Hotjar script. It's used to persist the Hotjar User ID, unique to that site on the browser. This ensures that behavior in subsequent visits to the same site will be attributed to the same user ID.	Functional	Third Party	1 Year

## 8.6 How to manage cookies

Before cookies are placed on your computer or device, you will be shown a pop-up requesting your consent to set those cookies. By giving your consent to the placing of cookies you are enabling us to provide the best possible experience and service to you.

You may, if you wish, deny consent to the placing of cookies. However, certain features of our website may not function fully or as intended when consent is denied.

Certain features of our website depend on strictly necessary cookies to function. Your consent will not be sought to place these cookies, but it is still important that you are aware of them. You may still block these cookies by changing your internet browser's settings. Please be aware that our website may not work properly if you do so.

## 8.7 How to delete cookies from your device

You can choose to delete cookies on your computer or device at any time, however you may lose any information that enables you to access our website more quickly and efficiently including, but not limited to, login and personalisation settings.

It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

You can also choose to enable or disable cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third-party cookies. For further details, please consult the help menu in your internet browser.

## 8.8 Changes to this Cookie Notice

This Cookie Notice may be amended from time to time, the latest version of the Cookie Notice will always be available on our website at <https://www.cushon.co.uk/info/terms>.

## 9. Updates to this Privacy Notice

We may update this Privacy Notice periodically. Where we do this we will inform you of the changes, and the date on which the changes take effect, and publish the updated Privacy Notice on our website. We would encourage you to visit our website regularly to stay informed of the purposes for which we process your information and your rights to control how we process it.

## 10. How to contact us

If you have questions regarding your privacy and rights, please contact us:

- Email: [help@cushon.co.uk](mailto:help@cushon.co.uk)
- Address: Stephenson House, 2 Cherry Orchard Road, Croydon CR0 6BA, United Kingdom

## 11. How to complain

If you have any concerns about our use of your personal information, you can make a complaint to our Data Protection Officer at [dpo@cushon.co.uk](mailto:dpo@cushon.co.uk).

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

# Schedule A – Schedule of Purposes of Processing

<b>Consent</b>  We may process your information where you have provided your explicit consent for the purpose.	<ul style="list-style-type: none"><li>• Marketing</li><li>• Promotion or marketing of our services on our website</li><li>• Cookie management</li><li>• Personalising and tailoring users' experience on our website</li><li>• Sending marketing emails or notifications that users have opted in to receiving, such as newsletters, blogs, resources or promotions</li></ul>
<b>Contractual necessity</b>  We may process your information where it is necessary to enter into a contract with you for the provision of our products or services or to perform our obligations under that contract.	<ul style="list-style-type: none"><li>• Supplying products and services</li><li>• Calculating, securing, and paying benefits</li><li>• Providing and managing accounts</li><li>• Providing and managing access to our website</li><li>• Contacting customers, including through sending notifications and responding to communications</li><li>• Registering an individual as a new client and verifying identity</li><li>• Providing customer service support</li><li>• Processing and monitoring incoming and outgoing payments and applicable taxes</li><li>• Administering and managing the Cushon Master Trust on behalf of its trustees</li><li>• Performing obligations and exercising any rights, duties, and discretions of the trustees of the Cushon Master Trust</li><li>• Identifying customers' potential options and, where necessary, implementing those options</li><li>• Utilising alternative ways of delivering the benefits of a pension scheme to members, including the use of insurance products or transfers/mergers with other pension arrangements</li><li>• Addressing any actual or potential disputes regarding a pension scheme</li><li>• Management of a pension scheme's liabilities, including entering into insurance arrangements and selecting scheme investments</li></ul>

## Compliance with a legal obligation

When you apply for a product or service (and throughout your relationship with us), we are required by law to collect and process certain personal information about you.

- Performing anti-money laundering checks, KYC and background checks and reporting to internal and external stakeholders
- Preventing fraud
- Deploying and monitoring business continuity plans
- Complying with the legal obligations of the trustees of the Cushon Master Trust
- Complying with legal and regulatory obligations, including record-keeping
- Complying with professional rules and regulations
- Complying with any demands made by regulators, government departments, law enforcement or tax authorities

## Legitimate interests

We may process your information where it is in our legitimate interests do so as an organisation or where it is in the legitimate interest of a third party.

- Communicating with customers
- Website analytics activities
- Logging and monitoring visitors to our offices
- Managing interactions with government entities
- Monitoring use of our information and communication systems to ensure compliance with our information security policies
- Deploying and monitoring business continuity plans
- Providing IT support
- Business management and planning, including accounting and auditing
- Managing relationship with introducers
- Market research
- Analysing use of our website and gathering feedback to improve the site and users' experiences
- Statistical and financial modelling and reference purposes
- Sale, merger, or corporate reorganisation of the pension scheme sponsors
- Analysing and improving our services
- Internal record-keeping
- Complying with any applicable voluntary codes
- Maintaining an opt-out database of those who unsubscribed from receiving certain types of communications



## Special Category Data

We will only process your special category data or criminal convictions data where it complies with a condition set out in Article 9 or Article 10 UK GDPR (respectively).

- Health data (the relevant processing condition is your consent in Article 9(2)(a) UK GDPR)
- Criminal conviction data (the relevant processing condition is either your consent in para 29 of Schedule 1 to the Data Protection Act 2018 or prevention and detection of unlawful acts in para 10 of Schedule 1 to the Data Protection Act 2018)