

Mortgages and Loans Privacy Notice

November 2025

HOW WE USE YOUR PERSONAL DATA

Introduction

We take our obligations under data protection law very seriously and we're committed to keeping your personal data secure.

Data Protection law, including the Data Protection Act 2018 and UK General Data Protection Regulation (UK GDPR), imposes obligations on us as a "data controller" when we collect, hold, amend, share or otherwise use or erase/destroy (collectively referred to as "processing") your personal data. It also gives you, as the "data subject", rights over your personal data.

One such obligation is to process your personal data fairly, lawfully and in a transparent manner. This privacy notice is designed to help you understand what personal data we hold, why it is required, and how it is used. It also sets out some of your legal rights.

ABOUT US

OSB GROUP PLC (company registration no. 11976839) is the London Stock Exchange listed entity and parent company for a specialist lending and retail savings group of companies (OSB Group) including OneSavings Bank plc (company registration no. 07312896) and Charter Court Financial Services Limited (company registration no. 06749498), which are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority.

In this privacy notice, the terms "we", "our", and "us" are used to refer to the relevant subsidiary/trading name and "data controller" for your personal data or, where applicable, to the OSB Group. Subsidiaries and our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006, may change from time to time and references to the OSB Group include successors in title and any other person who is for the time being entitled at law to the benefit of the mortgage or loan product.

Registered Data Controllers in the OSB Group

- OneSavings Bank PLC
- OSB Group PLC
- Kent Reliance Community Foundation
- Reliance Property Loans Limited
- Guernsey Home Loans Limited
- Jersey Home Loans Limited
- Rochester Mortgages Limited
- Heritable Development Finance Limited
- Interbay Funding, Ltd.
- Interbay Asset Finance Limited
- 5D Finance Limited
- Charter Court Financial Services Limited
- Exact Mortgage Experts Limited
- Prestige Finance Limited
- WSE Bourton Road Limited

We respect your right to privacy. If you have any questions or concerns about how we use your information, our Data Protection team will be happy to assist you. Please write to:

Group Data Protection Officer

OSB GROUP PLC

OSB House

Quayside

Chatham Maritime

ME4 4QZ

Alternatively, you can email us at: **dataprotection@osb.co.uk**

Please read the following carefully to understand our practices regarding your personal data and how it is processed.

WHO THIS PRIVACY NOTICE APPLIES TO

This privacy notice explains how we will use the personal data of:

- anyone who asks for a decision in principle on whether we would grant a loan to them;
- anyone who applies for or takes out a loan with us or has had a loan administered by us;
- anyone who becomes or applies to become a party or to be removed as a party to an existing loan;
- anyone who contributes towards the purchase of a property (including but not limited to gift deposits and director loans) which is security for our loan;
- anyone who does or may guarantee a loan with us;
- the directors, company secretary and shareholders of any company that takes out a loan with us or has a loan administered by us, and
- anyone else whose personal data we capture during the course of an application for or the administration of a loan e.g. persons occupying property (such as tenants or other occupiers) which is security for the loan, professional advisers, or persons representing you and others.

Each such person is referred to as “you” and “your” in this privacy notice.

HOW WE OBTAIN YOUR PERSONAL DATA

We will receive personal data about you from a variety of sources including:

- from you;
- other applicants or borrowers where you have made a joint application or took a loan with us jointly with someone else;
- a mortgage intermediary acting for you;
- other persons who represent or advise you;
- your bank or building society;
- your previous or existing lender or their advisers;
- your employer and former employers;
- credit reference agencies and fraud prevention agencies;
- Solicitors;
- Valuers;
- persons working on our behalf;
- market researchers;
- local and national government;
- tax and law enforcement agencies; and
- other companies within OSB Group.

We may also obtain data about you that is publicly available such as from the electoral register, the internet, Companies House and the Land Registry.

We will also create personal data about you during the course of an application for a loan and the administration of any loan you have with us.

THE TYPES OF PERSONAL DATA WE USE

We may process a wide variety of data about you, where necessary, for the purposes set out in the “How we use your personal data” section, including data about:

you as an individual	<ul style="list-style-type: none">name, title and address (including previous names and addresses)other contact details including email addresses and telephone numbersgender, date of birth and marital statusexpected retirement agenationalitynational insurance numbertax code
your employment	<ul style="list-style-type: none">employer(s) and previous employerslength of employmentrolesalary and other forms of incomedirectorships and shareholdings you hold
people connected to you	<ul style="list-style-type: none">your familyother people who live with you or in the property which is security for the loan such as tenants or other occupiersjoint mortgage holdersyour advisers, attorneys and representatives

your finances and the finances of any business you own or run	<ul style="list-style-type: none"> your bank account details (account number and sort code) including payments to and from your accounts the accounts and finances of any business you run your income, assets, loans, credit cards and other liabilities you may have properties you own or are owned by companies of which you are a shareholder or director your accounts with other creditors which are to be repaid from any loan we make or are secured against the property which is to be security for our loan to you including details of the creditor, terms of the loan, account/card number and sort code
your accounts, products and services you have with us	<ul style="list-style-type: none"> your account number the amount of your loan, its terms and how you will repay it payments to or from your loan account the purpose of the loan the property or properties which will be security for the loan
your communication preferences	<ul style="list-style-type: none"> whether you wish to receive marketing from us whether you prefer information in alternative formats e.g. braille or large print
your & our technology	<ul style="list-style-type: none"> device identifiers including IP address and log in details to our broker portals or other intermediary apps or websites storage and access technologies, for example tracking pixels in emails
your profile	<ul style="list-style-type: none"> including an assessment of you, your financial situation and the likely performance and repayment of your loan
your correspondence and documents we hold	<ul style="list-style-type: none"> correspondence or communications received or sent and the information contained within them documents we hold (e.g. driving licence, passport, birth certificate, evidence of how you intend to repay an interest only loan at the end of its term)
the results of checks we are required by law to undertake and any relevant criminal convictions	<ul style="list-style-type: none"> information received from credit reference agencies and fraud prevention agencies whether you are a Politically Exposed Person and/or subject to financial sanctions relevant criminal convictions

SPECIAL CATEGORY DATA

Some personal data for example data about your health, racial or ethnic origin is subject to additional rights and are described as “special category data”.

We will not routinely ask for or record special category data but we may record details (for example in relation to your health) if it is necessary and relevant for the management of the account (e.g. so we can make reasonable adjustments to assist you in accessing and managing your account(s), which may include sending you information in braille or large print, or if we think you are experiencing circumstances which may lead you to be financially or otherwise vulnerable).

We will only do this if you have confirmed your explicit consent to us doing so, or where we are legally permitted or required to process this information without seeking your consent. Where we have obtained your consent to us processing special category data in this way, you are entitled to withdraw your consent to this at any time. Please contact us if you wish to do so but that may affect our ability to manage your account in the most appropriate way for you. If you withdraw your consent, we will not continue to process this information for these purposes, but it will not impact the validity of any processing undertaken before you withdrew your consent.

HOW WE USE YOUR PERSONAL DATA

We will use your personal data to:

consider your application for a loan or decision in principle	<p>This will include to:</p> <ul style="list-style-type: none"> assess whether we think the loan can be afforded, determine whether we are willing to make a loan and, if we are, the terms of that loan check your identity undertake a credit assessment which will include credit scoring create and operate (with the assistance of any contracted third party) a mobile application or other digital platform providing status updates regarding your loan application to your mortgage intermediary liaise with your mortgage intermediary (including via mobile applications and other digital platforms) to progress, update and track, the application for a loan or decision in principle and to assess if our affordability and lending requirements are met
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	<ul style="list-style-type: none"> liaise with the solicitor advising us on the loan including to ensure that the property or properties which will be security for the loan meet our requirements, the terms of any mortgage offer are met, we will have a charge with the priority we expect over that property or properties and title to that property or properties is good and marketable obtain a physical or automated valuation of the property or properties which will be security for the loan and any other properties which you, or a company of which you are a director or shareholder, own to enable us to assess the amount of the loan, if any, which we are prepared to make
manage our relationship with you, provide and administer the loan and other products and services you have with us	<p>This will include to:</p> <ul style="list-style-type: none"> contact you about the loan make payments and process repayments of the loan manage fees, charges and interest due make arrears management decisions collect and recover any money owing to us locate you consider and/or dealing with post contract variations to your loan including partial and full discharge of our charge securing our loan over the property or properties, transfer of equity, resignation or change of guarantor, product transfers and further advances consider requests you and other persons make of us to decide whether we will agree to the request or provide the information requested ensure that we have a valid and enforceable charge over property which is, or is intended to be, security for the loan, with the priority we expected and that the title to that property is and continues to be good and marketable exercise our rights under the terms of our loan including obtaining possession of the property and, if we do, to sell the property subject to our charge exercise our rights under the terms of our loan to protect our security and perfect our legal charge including communicating and liaising with government bodies, authorities and public registries appoint a receiver if the loan is secured on a property that the borrower doesn't live in link the loan to other products and services you, or a company of which you are a director or shareholder have with us create records, produce correspondence and other documents and provide information to you and other persons correct any inaccurate data held by us and third parties identify circumstances which may make you vulnerable so that we can take account of this in our dealings with you update, consolidate and improve the accuracy of our records monitor and analyse the performance of your account with us and the products and services we provide consider any future applications you make for a loan or requests for a decision in principle tell you about products and services offered by us which we think may be of interest to you (further information on this is provided below) to tell you about and enter your details in periodical prize draw or other promotions and to comply with any regulatory requirement in respect of such prize draws or promotions
ensure that we have the information we need to consider your application or decision in principle and administer the account and ensure that other persons have the information they reasonably need	<p>This will include to:</p> <ul style="list-style-type: none"> obtain additional information about you that is publicly available or by making enquiries, searches, requesting references and other information that we consider necessary (including to confirm the truth and accuracy of your personal data) from you and other persons including your mortgage intermediary, tax authorities, past/present employers, landlords, accountants, lenders, insurers, bank/building society, the Benefits Agency, Land Registry, Companies House, social media and the internet, credit reference agencies and fraud prevention agencies contact, obtain or provide information about you from or to debt management companies, trustees in bankruptcy, supervisors of individual voluntary arrangements and personal representatives contact, obtain or provide information about you from or to any other lender or person who has or may have a charge over or other interest in the property which is security for the loan
identify and prevent financial crime	<p>This will include to:</p> <ul style="list-style-type: none"> detect, prevent, investigate and/or report suspected money laundering, fraud, bribery, corruption, modern slavery, safeguarding offences and other crime

comply with our legal, contractual and regulatory obligations, codes of practice and to run our business	<p>This will include to:</p> <ul style="list-style-type: none"> share data about you and the conduct and operation of the loan during its term and after it is repaid with: <ul style="list-style-type: none"> any guarantor or intended guarantor of the loan; our regulators, the Bank of England and ratings agencies; our investors or potential investors, funders and their advisers; any prospective or actual purchaser of us or of any interest in us, seller to us or party seeking to merge with us or any person who does or wishes to fund or otherwise be involved in any such transaction and their representatives; any person who was previously the lender or who has an interest in the loan, their representatives and advisers; organisations involved with potential or actual corporate restructuring, merger, acquisition or takeover, including any transfer or potential transfer of any of our rights or duties under our agreement with you; any organisation that participates or intends to participate in a finance transaction we undertake or intend to undertake, but only where necessary for the purposes relating to those transactions including to enable those organisations to exercise rights they have and to review loan files; credit reference agencies and fraud prevention agencies who in turn will provide data to us (further information on this is provided below). The information shared with credit reference agencies may be shared onwards with gambling operators for the purpose of carrying out financial risk checks; any organisation that we might engage to outsource our contractual rights and obligations and service our loans; any administrators, liquidators, insolvency practitioner or their advisers in the course of any insolvency practice of our business; third party suppliers, insurers, auditors, service providers and/or legal advisers to the extent they assist us with our legal/regulatory obligations and protect our security; landlords, managing agents, housing or local authority or any other third party that has a legal or beneficial interest in the security property charged to us pursuant to the terms of your loan; any organization or regulatory body overseeing or involved in the running or regulation of prize draws and other competitions or promotions. identify if you, a close associate or relative are subject to financial sanctions or are considered politically exposed provide data, reports and returns to our regulators, other statutory bodies, our trade bodies or when required by a court order or other legal or contractual obligation manage, monitor, analyse, develop, forecast and report on the performance of our businesses, suppliers and other third parties including accounting and auditing manage how we lend and use our resources manage risk for us and our customers ensure that we treat our customers fairly, including identifying and taking relevant vulnerabilities into account seek advice from our professional advisers pay fees to the introducers of business to us and to provide them with management information on the performance of their business comply with any other legal obligation imposed on us, including where you have sought to exercise your legal rights
develop and improve our products and services	<p>This will include to:</p> <ul style="list-style-type: none"> test products and services obtain your feedback on the products and services we provide undertake market research ensure that we meet high standards of customer service, including monitoring recorded telephone calls and training staff. <p>We will share your name and email address with consumer review websites and other independent research agencies who may contact you asking for your feedback about the products and service we have provided. These requests are solely for the purpose of gathering customer feedback to help us assess and improve the service we provide. They are not marketing communications. We rely on legitimate interests to carry out this activity, but you can opt-out of receiving feedback requests at any time by contacting us.</p>

undertake analysis, produce models, statistics, reports and forecasts	This will include to: <ul style="list-style-type: none"> predict your economic situation and/or future behaviour analyse and model the likely future performance of your loan and other loans that we may make or be asked to make in the future
investigate and respond to queries, complaints, disputes and where necessary to bring or defend legal claims	This will include to: <ul style="list-style-type: none"> identify and document facts and evidence investigate and respond to queries, complaints, disputes, regulatory investigations and/or to bring or defend legal claims allow us to ensure that we offer the highest standard of customer service, by identifying if we have provided any inadequate service and the causes of such failings, and to determine how to avoid any repeat of that situation and improving our services

WHO WE SHARE YOUR PERSONAL DATA WITH

We may share your personal information with any member of OSB Group, which means any subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006 and any of its assignees or transferees.

We may also share your information with other members of the OSB Group (listed in the About Us section, above) for marketing purposes, where permitted by law. This means another OSB Group company may use your information to send you marketing about its own products and services. For more information, see the Marketing section, below.

We will only disclose your information to:

- business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
- providers of payment services such as Worldpay (privacy statement available on website);
- third party suppliers, insurers, auditors, service providers and/or legal advisers to assist us with our legal/regulatory obligations and to protect our security including providers of services in respect of anti-money laundering, fraud, verification, etc.;
- third party suppliers of information technology services, mobile applications and platforms that assist us in the improvement and optimisation of our services;
- our affiliates and selected third parties so that they can contact you with details of the services that they provide, where you have opted-in/consented to the disclosure of your personal data for these purposes;
- providers of analytics that assist us in the improvement and optimisation of our services and/or protection of our security;
- organisations involved with any potential or actual corporate restructuring, merger, acquisition or takeover, including any transfer or potential transfer of any of our rights or duties under our agreement with you;
- organisations involved in any finance transaction which we undertake or intend to undertake including, but not limited to, underwriters, loan servicers, rating agencies, data room providers, trust managers and security trustees;
- our regulators, law enforcement, credit reference agencies or fraud prevention agencies, as well as our legal advisors, courts any other authorised bodies including for the purposes of investigating any actual or suspected criminal activity or other regulatory or legal matters, etc;
- any administrators, liquidators, insolvency practitioner or their advisers in the course of any insolvency practice of our business;
- landlords, managing agents, housing or local authority or any other third party that has a legal or beneficial interest in the security property charged to us pursuant to the terms of your loan.

We may disclose your personal information to third parties:

- if you require us to or you have given us permission to share your information, this may include:
 - customers you share a joint account with.
 - those representing you, which may include solicitors, debt management companies and your attorneys.
- in the event that we consider selling or buying any business or assets, in which case we will disclose your personal data to any prospective sellers or buyers of such business or assets;
- if we, or substantially all of our assets, are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets;
- in the event of any insolvency situation (e.g. the administration or liquidation) of OSB GROUP PLC or any of its group entities;
- in order to enforce or apply our website, mobile applications or service terms;
- to protect the rights, property, or safety of us, our staff, our customers, or others. This includes exchanging information with other companies and organisations (including legal advisers, insurers and auditors) for the purposes of staff and customer safety, crime prevention, fraud protection and credit risk reduction; and
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation or regulatory requirements, or otherwise for the prevention or detection of fraud or crime.

AUTOMATED DECISIONS

Sometimes we may use your personal data to make an automated decision (applicable to certain products only). These help to ensure that our decisions are quick, fair and efficient based on the data we have about you including data we receive from credit reference and fraud prevention agencies.

The type of automated decisions we may make are:

- to check whether you meet the conditions required to open the account you have applied for;
- to check your identity;
- to create a profile of you;
- to decide whether we will make a loan and the terms therein;
- to decide whether we will offer additional products and services or the opportunity to vary existing products or services and the terms of any such products, services or variation;
- to identify when there may be a risk of the terms of the loan being breached; or
- to decide how we will manage the account when the terms of the loan have been breached or we consider there is an increased risk that a breach may occur.

These automated decisions may also take into account details of any products you already have with us and/or any assessment of your financial status and risks we have undertaken.

While we may use automated systems to help make decisions, all such decisions involve human review before being finalised. This means a suitable trained member of staff considers the outcome of the automated process, together with any relevant information, before a final decision is made.

You may ask us not to make automated decisions about you by contacting our Data Protection Officer, or ask us to review any automated decision that we have made taking account of any additional information you wish to provide to us.

CALL RECORDING AND MONITORING

We may record and/or monitor telephone calls with you for the following purposes:

- for security, quality and/or training;
- to confirm that we have complied with your instructions;
- to resolve or investigate any queries, complaints or claims;
- to comply with our legal obligations, or
- to prevent fraud or other criminal activities.

Call monitoring may include the use of automated technology to help us assess the quality of our calls (for example by identifying, through key words, calls to be reviewed manually). No automated decisions are made through the use of call monitoring technology. We do not transcribe our calls or call recordings.

MARKETING

We, and other members of the OSB Group, may contact you about products or services offered by post, electronic mail, telephone, SMS text messaging and any other online or interactive media if, when we collected your personal data, you consented to receive marketing communications or in certain circumstances have not opted out of marketing communications.

We use a range of digital marketing methods to promote our products and services, including online advertising through platforms such as Google Ads, social media channels (for example Facebook, Instagram, LinkedIn), and other online networks. These platforms may use cookies, pixels or other similar technologies to collect information about your online activities and show you advertising that is more relevant to you. You can find out more about how we use cookies in our Cookie Notice.

We may also provide you with certain marketing information including third party services or products where you have provided your consent for us to do so.

You can ask us to stop or start sending you marketing messages at any time by contacting us. You can also unsubscribe from electronic marketing communications by using the 'unsubscribe' function.

THE LEGAL GROUNDS WE RELY ON TO PROCESS YOUR PERSONAL DATA

Data protection law requires that we meet certain conditions before we are allowed to use your data in the manner described in this privacy notice. We rely on the following legal grounds in order to process your data:

• Processing of your data is necessary for the performance of a contract you are party to or to take steps at your request prior to entering into a contract

When you open an account with us, you enter into a legal contract under which we provide mortgages or loans to you. We require certain personal data in order to establish a contractual relationship. For example, you provide information about yourself in application forms, without which we would be unable to identify you.

- **Processing of your data is necessary for compliance with a legal obligation which we are subject to**

We are required to process certain personal data in order to comply with our legal and regulatory obligations including UK anti-money laundering regulations, for the purposes of ongoing fraud detection and reporting and to ensure the fair treatment of vulnerable customers.

- **We have obtained your consent**

We may process certain information where you have provided your consent for us to do so. For example, you may provide us with your explicit consent to process certain special category data such as health data (for example, to inform us about hearing difficulties) where this assists us in providing services to you.

Where we rely upon your consent in order to process your personal data you may withdraw this consent at any time. If you withdraw your consent, we will not continue to process this information for the purposes for which you provided your consent, but it will not impact the validity of any processing undertaken before you withdrew your consent.

- **Processing your data is necessary to protect your vital interests or the vital interests of another person.**

In exceptional circumstances we may also process information where this is necessary to protect you or another person and where you are physically or legally incapable of providing consent.

- **Processing of your data is necessary for the purposes of the legitimate interests pursued by us or by a third party, except where such interests are outweighed by your interests, fundamental rights and freedoms**

Personal data is processed where it is necessary for our legitimate interests including to help us manage our business and to analyse, assess and improve the viability and popularity of our products. It is also processed to enable us to respond to queries, complaints and for the establishment and defence of legal rights.

Personal data is shared with external Credit Reference Agencies (CRAs) and Fraud Prevention Agencies (FPAs).

The legitimate interests being pursued by us and by CRAs and FPAs are:

- **Promoting responsible lending and helping to prevent over-indebtedness**

“Responsible lending” means that lenders only sell products that are affordable and suitable for the borrowers’ circumstances. CRAs assist lenders to check that financial products are suitable, by providing personal data about potential borrowers, their financial associates where applicable, and their financial history.

- **Helping prevent and detect crime and fraud and anti-money laundering services and verify identity**

CRAs and FPAs help lenders to comply with their legal and regulatory obligations and protect their businesses by providing identity, fraud detection / prevention and anti-money laundering services.

If it is determined that you pose a fraud or money laundering risk, we may refuse to provide the services and financing you have requested, or we may stop providing existing services to you. A record of any fraud or money laundering risk will be retained by the FPAs, and may result in others refusing to provide services, financing or employment to you.

You can contact us using the details below (see ‘Your rights’) to find out which CRAs and FPAs we share data with.

- **Supporting tracing and collections**

CRAs provide services that support tracing and collections to recover debt, to reunite, or confirm an asset is connected with, the right person.

We will continue to exchange information about you with CRAs while you have a relationship with us. We will also inform the CRAs about your settled accounts. If you borrow and do not repay in full and on time, CRAs will record the outstanding debt. This information may be supplied to other organisations by CRAs.

When CRAs receive a search from us they will place a search footprint on your credit file that may be seen by other lenders.

If you are making a joint application or tell us that you have a spouse or financial associate, we will link your records together, so you should make sure you discuss this with them, and share with them this information, before lodging the application. CRAs will also link your records together and these links will remain on your and their files until such time as you or your partner successfully files for a disassociation with the CRAs to break that link.

You can see the information CRAs hold about you for free by contacting them directly. The identities of the CRAs, their role also as fraud prevention agencies, the data they hold, the ways in which they use and share personal information, data retention periods and your data protection rights with the CRAs are explained in more detail from each of the three CRAs within their Credit Reference Agency Information Notice (CRAIN):

- Experian: www.experian.co.uk/crain
- Equifax: www.equifax.co.uk/crain
- TransUnion: www.transunion.co.uk/crain

You should be aware that if you do not meet the obligations of any agreement with us, the availability of this information to credit reference agencies and therefore to other lenders may have a serious effect on your ability to obtain credit in the future.

JOINT ACCOUNT HOLDERS

Where you hold a joint account or make a joint application, certain personal data will be shared between the account holders. This is necessary for us to administer the account and fulfil our contractual obligations. Please note that some of your data (such as contact details or relevant communications) may be accessible to the other party.

If one joint account holder exercises their data protection rights (for example, by requesting access to personal data), we will provide them with their own personal data and information relating to the operation of the joint account. However, we will not share the personal data of any other joint account holder without their consent or another valid legal basis. If rights exercised by one individual would affect the rights of another, we may need to balance our interests, and we will explain our approach if this arises.

KENT RELIANCE PRIZE DRAW

Where applicable, information about Kent Reliance customers is also processed for the purposes of the Kent Reliance Prize Draw. Kent Reliance runs a £1,000 monthly prize draw for individual customers who are over 18 and have a savings account with a balance of £100 or more or a mortgage account with a debit balance of £1,000 or more. If the account is a joint account, then the first named account holder will be entered. There will usually be one entry per person. Eligible customers will be automatically entered into the draw. Winners will be contacted directly.

If you'd prefer not to be part of the draw, please let us know by emailing prizedraw@osb.co.uk and we'll remove your details. Please see the full prize draw terms and conditions, and exclusions, and competition privacy notice here [Prize Draw Terms and Conditions | Kent Reliance](#).

WHERE PERSONAL DATA IS PROCESSED

Information which you provide to us is stored on our secure servers located in the UK. However, data that we collect from you may be also transferred to, or processed in, a destination outside the UK. In particular, we have operations centres in India which access and process data and we engage some third parties that may store or process personal data outside of the UK. Your personal data may also be processed by staff operating outside the UK who work for us or for one of our suppliers. This includes staff engaged in the processing of your payment details and the provision of support services.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy notice. In particular, when personal data is processed outside of the UK, we will make sure appropriate safeguards are in place, in accordance with legal requirements, to protect the data.

In all cases these safeguards will include one of the following:

- sending the data to a country that's been approved by the UK Government as having a suitably high standard of data protection law; or
- putting in place a contract with the recipient containing terms approved by the UK authorities as providing a suitable level of protection.

FPAs may also allow the transfer of your personal data outside of the UK. This may be to a country where the UK Government has decided that your data will be protected to UK standards, but if the transfer is to another type of country, then the FPAs will ensure your data continues to be protected by ensuring appropriate safeguards are in place.

HOW LONG PERSONAL DATA IS KEPT FOR

We will retain information about you for the period necessary to fulfil the purposes for which the information was collected. After that, we will anonymise or delete it. The retention period may vary depending on the purposes for which the information was collected.

Where a specific legal or regulatory requirement applies to your information we will retain it for at least the period of time specified in such legal or regulatory requirement. In the absence of a specific legal or regulatory requirement, we will usually retain your information for up to seven years following the end of your relationship with us or, in relation to certain mortgage lending, the closure of a specific mortgage account. However, we may occasionally be required to extend a retention period if the information is required for ongoing litigation, regulatory, tax or accounting purposes.

Please also note that FPAs can hold your personal data for different periods of time, and if you are considered to pose a fraud or money laundering risk, your data can be held by them for up to six years.

YOUR RIGHTS

You have a number of rights under data protection law in relation to the way we process your personal data. These are set out below:

Right to be informed	A right to be informed about how we collect and use your personal data.
Right of access	A right to access personal data held by us about you. Please note that this right applies to your personal data only. It does not require us to provide copies of entire documents, where doing so would expose data that is not your personal data, is commercially sensitive or otherwise exempt from disclosure under data protection law. Where appropriate we will instead provide you with the personal data contained within such documents.
Right to rectification	A right to require us to rectify any inaccurate personal data held by us about you.
Right to erasure	A right to require us to erase personal data held by us about you. This right will only apply where (for example): we no longer need to use the personal data to achieve the purpose we collected it for; or where you withdraw your consent if we are using your personal data based solely on your consent; or where you object to the way we process your data (in line with the right to object below).
Right to restrict processing	In certain circumstances, a right to restrict our processing of personal data held by us about you. This right will only apply where (for example): you dispute the accuracy of the personal data held by us; or where you would have the right to require us to erase the personal data but would prefer that our processing is restricted instead; or where we no longer need to use the personal data to achieve the purpose we collected it for, but you still require the data for the purposes of dealing with legal claims.
Right to data portability	In certain circumstances, a right to receive personal data, which you have provided to us, in a structured, commonly used and machine readable format. You also have the right to require us to transfer this personal data to another organisation, at your request.
Right to object	A right to object to our processing of personal data held by us about you in certain circumstances (including where the processing is necessary for the purposes of the legitimate interests pursued by us or a third party). You also have the right to withdraw your consent, where we are relying on it to use your personal data; or ask us to stop processing your data for direct marketing purposes.
Rights related to automated decision making including profiling	In certain circumstances, a right not to be subject to a decision based solely on automated processing (without any human involvement), including profiling.

You may contact us using the details on our website (or by contacting our Data Protection team directly – details above) to exercise any of these rights. We will acknowledge, and normally action, a request received from you within one month from the date we receive the request. However, as outlined above some rights are restricted and we may not always be able to action your request.

If you have any concerns regarding our processing of your personal data or are not satisfied with our handling of any request by you in relation to your rights, you will need to contact us in the first instance using the contact details above. We will respond to you within one month. You then have the right to make a complaint to the Information Commissioner's Office (ICO) by contacting:

Website: ico.org.uk

Telephone: 0303 123 1113

Address: First Contact Team

Information Commissioner's Office Wycliffe House

Water Lane Wilmslow Cheshire

SK9 5AF

SECURE ONLINE SERVICES

We use appropriate technical and organisational measures to protect the information we collect and process about you and our online services are provided using secure servers. We use Secure Sockets Layer (SSL) software to encrypt information, in order to protect your security.

We regularly review our systems and process to ensure our online services are provided using secure servers, however, no Internet transmission can ever be guaranteed 100% secure. We recommend that you install, use and maintain up-to-date anti-virus, firewall and anti-spyware software on your computer to better protect yourself.

You must ensure that you log out of your account at the end of an online session (where applicable) and never leave your computer unattended when logged in.

USE OF COOKIES

Cookies are small text files that web servers can store on your computer's hard drive when you visit a website. They allow the server to recognise you when you revisit the website and to tailor your web browsing experience to your specific needs and interests. If you wish to restrict or block the cookies which are set by us, you can do this through your internet browser settings or the cookies preference management tool on the relevant website.

We utilise web beacons or tracking pixels within our electronic notifications and service communications with you (and may also include such technologies within marketing communications where you have consented to receiving marketing communications from us) to ensure successful delivery and opening/availability of notifications and communications issued by us in the performance of services to you. These technologies consist of clear electronic images within email communications which recognise certain information, for the purposes of our activities this information is delivery status and email opening status (i.e. has the email been successfully delivered, rejected, or bounced and has the email been successfully opened by the recipient). We use this technical information to ensure our electronic services work correctly for customers and to improve our products and services.

Further information about our use of cookies can be found on each website.

LINKS TO THIRD PARTY WEBSITES

Our websites may, from time to time, contain links to and from third party websites. If you follow a link to any of these websites, please note that they have their own privacy notice and we do not accept any responsibility or liability in relation to third party websites. Please check the relevant privacy notice before you submit any data to these websites.

CHANGES TO OUR PRIVACY NOTICE

We may update this privacy notice from time to time. Any changes we may make in the future will be posted on our websites and we recommend that you revisit the Privacy Policy page from time to time to stay informed about how we use your information.