

privacy notice how we will use your information

Buckinghamshire 
Building Society
doing the right thing

www.bucksbs.co.uk



WHO WE ARE AND HOW TO CONTACT US AND OUR DATA PROTECTION OFFICER

Buckinghamshire Building Society of High Street, Chalfont St. Giles, Buckinghamshire, HP8 4QB is a data controller of your “personal information” under relevant data protection law. This means information that is about you or from which you can be identified. This privacy notice describes how we deal with your personal information in the context of our business relationship with you and will describe how and why it is processed in the ways explained. When we use terms such as **we**, **us** and **our** in this notice, we mean Buckinghamshire Building Society.

Our Data Protection Officer can be contacted at any time. If you have queries about the information contained in this privacy notice or if you wish to exercise any of the rights mentioned in it you can write to the above address or email dpo@bucksbs.co.uk.

This information may be updated from time to time. This means we may send you an updated copy (depending on whether we are required to do that or not). The current details of how we use your personal information are available on our website www.bucksbs.co.uk at any time.

WHAT KINDS OF PERSONAL INFORMATION ABOUT YOU DO WE PROCESS?

This will depend on the products or services you apply for and obtain from us and if your application is successful. You will find detailed below what information is processed in each category.

PERSONAL INFORMATION THAT WE GENERALLY PROCESS IN CONNECTION WITH ALL OUR PRODUCTS AND SERVICES

This includes:

- Your title, full name, your contact details, including for instance your email address, home and mobile telephone numbers;

- Your home address, correspondence address (where different from your home address) and address history;
- Your date of birth and/or age, e.g. to make sure that you are eligible to apply for the product and/or that it is suitable for you;
- Your nationality, if this is necessary for us to comply with our legal and regulatory requirements;
- Details of offences and alleged offences, criminal proceedings, outcomes and sentences;
- Records of how you have contacted us and, if you get in touch with us online, details such as your mobile phone location data, IP address and MAC address;
- CCTV images when you visit us; and
- Some special categories of personal data such as about your health or if you are a vulnerable customer (more details in this notice).

ADDITIONAL PERSONAL INFORMATION THAT WE PROCESS IN CONNECTION WITH A MORTGAGE

Our mortgage products and services are available through professional and financial advisors and anyone else who acts as a person sitting in between you and us in relation to what we do for you. In this notice we will call these persons “brokers and other intermediaries”. When a broker or other intermediary processes your personal information on our behalf, this privacy notice will apply and you should contact our Data Protection Officer to exercise your rights under data protection laws. When a broker or other intermediary processes your personal information as a data controller in its own right, its own privacy notice will apply and you should ask them for a copy if you do not have one by the time you are introduced to us.

Information includes:

- Your financial details e.g. your salary and details of other income including pension details, details of your savings, details of your expenditure, and details of account(s) held with other providers if you pay your mortgage from those account(s);

- Details about all of your existing borrowings and loans;
 - Personal information about your credit history which we obtain from Credit Reference Agencies including data which originates from Royal Mail (UK postal addresses), local authorities (electoral roll), the insolvency service, Companies' House, other lenders and providers of credit (who supply data to the CRAs), court judgments decrees and administration orders made publicly available through statutory public registers (see the section on 'Credit Reference Agencies');
 - Information about your employment status including whether you are employed, retired or receive benefits;
 - Information about your occupier status, such as whether you are a tenant, live with parents or are an owner occupier of the property in which you live at the time of your application;
 - Information which is relevant for your residency and/or citizenship status, such as your nationality, your length of residency in the UK and/or whether you have the permanent right to reside in UK;
 - Your marital status, family, lifestyle or social circumstances if relevant to the mortgage product (e.g. the number of dependents you have or if you are a widow or widower);
 - Other occupants over 17 years of age who reside at the security address;
 - Where relevant, information about any guarantor which you provide in any application;
 - Your National Insurance number; and
 - Copy of your passport / driving licence, if provided for ID purposes.
- details, details of your other savings, details of account(s) held with other providers if you pay into your savings product from those other account(s) and details of your nominated account you pay into from your savings product;
 - Where a person other than the savings account holder makes a withdrawal from the account, information about that person and the transaction;
 - Information about your tax position;
 - Information about your employment status including whether you are employed or retired;
 - Your National Insurance number; and
 - Copy of your passport / driving licence, if provided for ID purposes.

JOINT APPLICANTS, GUARANTORS AND POWERS OF ATTORNEY

If you make a joint application with your spouse, partner or family member, we will also collect the personal information previously mentioned about that person. If you look at the "What are the legal grounds" section you will see reference to consent and a description of some limited scenarios where it maybe relevant to what we do with personal information.

If you apply for your mortgage with a guarantor, that person will also get a copy of this privacy notice when he/she submits his own personal information to us because he/she must also sign the application form and provide their details in the application.

If there is somebody who has power of attorney over your affairs, that person will see this privacy notice when we make contact with him/ her directly.

ADDITIONAL PERSONAL INFORMATION THAT WE PROCESS IN CONNECTION WITH A SAVINGS PRODUCT

This includes:

- Your financial details e.g. your salary and details of other income including pension

WHAT IS THE SOURCE OF YOUR PERSONAL INFORMATION?

We will generally collect your personal information from you directly. If you are introduced to us by a broker or other intermediary, we will obtain some personal information about you indirectly from them, when they introduce you to us.

In addition, we obtain your personal information from other sources such as Credit Reference Agencies, your employer, landlord, other lenders, HMRC, DWP, financial advisors, solicitors, Companies House, Charities Commission, publicly available directories and information (e.g. telephone directory, social media, internet, news articles), debt recovery and/or tracing agents, other organisations to assist in prevention and detection of crime, police and law enforcement agencies.

Some of the personal information obtained from Credit Reference Agencies will have originated from publicly accessible sources. In particular, Credit Reference Agencies draw on court decisions, bankruptcy registers and the electoral register (also known as the electoral roll). We explain more about Credit Reference Agencies in this privacy notice.

WHAT ARE THE LEGAL GROUNDS FOR OUR PROCESSING OF YOUR PERSONAL INFORMATION (INCLUDING WHEN WE SHARE IT WITH OTHERS)?

Throughout this privacy notice by the term “process” or “processing” we mean everything we do with your personal information from its collection, right through to its destruction or deletion when we no longer need it. This includes for instance collecting it (from you), obtaining it (from other organisations), using, sharing, storing, retaining, deleting, destroying, transferring it overseas.

Data protection laws require us to explain what legal grounds justify our processing of your personal information. For some processing more than one legal ground may be relevant (except where we rely on consent). Here are the legal grounds that are relevant to us:

1) Processing necessary to **perform our contract with you for the mortgage product or the savings product or for taking steps prior to entering into it during the application stage:**

- a) To decide whether to enter into it;
- b) Administering and managing your mortgage or savings account and

services relating to that, updating your records, tracing your whereabouts to contact you about your account and for mortgage accounts doing this for recovering debt;

- c) Sharing your personal information with other payment services providers such as when you ask us to share information about your account with them; and
- d) All stages and activities relevant to managing your mortgage or savings account including enquiry, application, administration and management of accounts, illustrations, requests for transfers of equity and for mortgage accounts setting up/changing/removing guarantors.

2) Where we consider that, on balance, it is appropriate for us to do so, processing necessary **for legitimate interests**; by “legitimate interests” throughout this privacy notice we mean where data protection laws allow the processing of personal information where the purpose is legitimate and is not outweighed by your interests, fundamental rights and freedoms. Those laws call this the legitimate interests legal ground for personal data processing. The legitimate interests which apply to us and in some cases other organisations (who we have listed in this notice) are:

- a) Administering and managing your mortgage or savings account and services relating to that, updating your records, tracing your whereabouts to contact you about your account and for mortgage accounts doing this for recovering debt;
- b) To test the performance of our products, services and internal processes;
- c) To adhere to guidance and best practice under the regimes of governmental and regulatory bodies such as HMRC, the Financial

Conduct Authority, the Prudential Regulation Authority, the Ombudsman, the Information Commissioner's Office and under the Financial Services Compensation Scheme;

- d) For management and audit of our business operations including accounting;
- e) To carry out searches at Credit Reference Agencies pre-application and at the application stage. Where you have been introduced to us by a broker or other intermediary they may do these searches on our behalf;
- f) To carry out monitoring and to keep records;
- g) To administer our good governance requirements such as internal reporting and compliance obligations or administration required for AGM voting processes;
- h) To process information about a crime or offence and proceedings related to that;
- i) For analysis and developing statistics; and
- j) When we share your personal information with these other people or organisations:
 - Your guarantor (if you have one) for your mortgage product;
 - Joint account holders, trustees and beneficiaries and any person with power of attorney over your affairs (in each case only if relevant to you);
 - Other payment services providers such as when you ask us to share information about your account with them;
 - Other account holders or individuals when we have to provide your information to them because some money paid to you by them should not be in your account;
 - The broker or other intermediary who introduced you to us;
 - Our legal and other professional advisers, auditors and actuaries;
 - Financial institutions and trade associations;

- Other organisations and businesses who provide services to us such as debt recovery agencies, backup and server hosting providers, IT software and maintenance providers, document storage providers and suppliers of other back office functions;
- Buyers and their professional representatives as part of any restructuring or sale of our business or assets; and
- Credit Reference Agencies as part of our application process and on-going management of your account.

3) Processing necessary **to comply with our legal obligations:**

- a) For compliance with laws that apply to us;
- b) For establishment, defence and enforcement of our legal rights;
- c) For activities relating to the prevention, detection and investigation of crime;
- d) To carry out identity and anti-money laundering checks pre-application, at the application stage, and periodically after that. Where you have been introduced to us by a broker or other intermediary they may do these searches on our behalf;
- e) To carry out monitoring and to keep records;
- f) To deal with requests from you to exercise your rights under data protection laws;
- g) To process information about a crime or offence and proceedings related to that (in practice this will be relevant if we know or suspect fraud); and
- h) When we share your personal information with these other people or organisations:
 - Your guarantor (if you have one) for your mortgage product;
 - Joint account holders, Trustees and beneficiaries, and the person with power of attorney over your affairs;
 - Other payment services providers such as when you ask us to share

information about your account with them;

- Other account holders or individuals when we have to provide your information to them because some money paid to you by them should not be in your account;
- Law enforcement agencies and governmental and regulatory bodies such as HMRC, the Financial Conduct Authority, the Prudential Regulation Authority, the Ombudsman, the Information Commissioner's Office and under the Financial Services Compensation Scheme (depending on the circumstances of the sharing); and
- Courts and to other organisations where that is necessary for the administration of justice, to protect vital interests and to protect the security or integrity of our business operations.

4) Processing with your **consent**:

- a) When you request that we share your personal information with someone else and consent to that;
- b) For some of our processing of special categories of personal data such as about your health or if you are a vulnerable customer (we will explain to you how your data will be processed when we request your explicit consent); and
- c) For direct marketing communications.

5) Processing for a **substantial public interest** under laws that apply to us where this helps us to meet our broader social obligations such as:

- a) Processing of your special categories of personal data such as about your health or if you are a vulnerable customer;
- b) Processing that we need to do to fulfil our legal obligations and regulatory requirements; and

- c) When we share your personal information with other people and organisations if they need to know that you are a vulnerable customer and your relatives, social services, your carer, the person who has power of attorney over your affairs.

HOW AND WHEN CAN YOU WITHDRAW YOUR CONSENT?

Much of what we do with your personal information is not based on your consent; instead it is based on other legal grounds. Where processing is based on your consent, you have the right to take back that consent for future processing at any time. You can do this by contacting our Data Protection Officer. In doing so you will need to consider the following:

- The consequence might be that we cannot send you some marketing or other communication;
- We may not be able to take into account special categories of personal data such as about your health or if you are a vulnerable customer (but these outcomes will be relevant only in cases where we rely on explicit consent for this);
- We will tell the broker or other intermediary who introduced you to us that you have withdrawn your consent only if it is our data processor (this means an organisation that is processing personal information on our behalf) or if we are required to do so when you exercise certain rights under data protection laws. You should make sure to contact them directly to withdraw your consent for what they do with your personal information as a data controller in their own right; and
- Payment Services Regulation requires us to share your personal information with other payment service providers in certain circumstance. Whilst those providers rely on "consent" for this, "consent" in that context does not have the same meaning as "consent" under data protection laws and this may relate to other categories of processing data, such as for legal or regulatory obligations, thereby we may

need to continue to hold your data for this purpose.

IS YOUR PERSONAL INFORMATION TRANSFERRED OUTSIDE THE UK OR THE EEA?

We are based in the UK but sometimes your personal information may be transferred outside the UK or the European Economic Area. If it is processed within Europe or other parts of the European Economic Area (EEA) then it is protected by European data protection standards. Some countries outside the EEA do have adequate protection for personal information under laws that apply to us. We will make sure that suitable safeguards are in place before we transfer your personal information to countries outside the EEA which do not have adequate protection under laws that apply to us.

Safeguards include contractual obligations imposed on the recipients of your personal information. Those obligations require the recipient to protect your personal information to the standard required in the European Economic Area.

HOW DO WE SHARE YOUR INFORMATION WITH CREDIT REFERENCE AGENCIES? (MORTGAGE CUSTOMERS ONLY)

In order to process your application we will supply your personal information to credit reference agencies (CRAs) and they will give us information about you, such as about your financial history. We do this to assess creditworthiness and product suitability, check your identity, manage your account, trace and recover debts and prevent criminal activity.

We will also continue to exchange information about you with CRAs on an ongoing basis (mortgage customers only), including about your settled accounts and any debts not fully repaid on time. CRAs will share your information with other organisations. Your data will also be linked to the data of your spouse, any joint applicants or other financial associates.

The Society shares information with the following CRAs.

Credit Reference Agency

Experian Limited

Post :

Experian, P O Box 9000, Nottingham, NG80 7WF

Web Address :

<http://www.experian.co.uk/consumer/contact-us/index.html>

CRAIN document: www.experian.co.uk/crain

E Mail :

consumer.helpservice@uk.experian.com

Phone:

0344 481 0800 or 0800 013 8888

Equifax Limited

Post :

Equifax Ltd, Customer Service Centre, PO Box 10036, Leicester, LE3 4FS

Web address :

https://www.equifax.co.uk/contact-us/contact_us_personal_solutions.html

CRAIN document: www.equifax.co.uk/crain

E Mail :

www.equifax.co.uk/ask

Phone :

0333 321 4043 or 0800 014 2955

WHERE CAN I FIND OUT MORE?

Full identities of the CRAs, and the ways in which they use and share personal information, as data controllers is explained in more detail in the separate leaflet “Credit Reference Agency Information Notice” (CRAIN) which is available upon request or can also be found on their websites as detailed above.

The Information Commissioner’s office also publishes advice and information for consumers in its *Credit explained* leaflet available at <https://ico.org.uk/media/for-the-public/documents/1282/credit-explained-dp-guidance.pdf>

WHAT SHOULD YOU DO IF YOUR PERSONAL INFORMATION CHANGES?

You should tell us without delay so that we can update our records. You can do this by visiting us or writing to us at Buckinghamshire Building Society, High Street, Chalfont St. Giles, Buckinghamshire, HP8 4QB. If you were introduced to us by a broker or other intermediary who is data controller in its own right, you should contact them separately. In some cases where you exercise rights against us under data protection laws we may need to inform the broker or other intermediary but this will not always be the case.

DO YOU HAVE TO PROVIDE YOUR PERSONAL INFORMATION TO US?

We are unable to provide you with a mortgage product or savings product or to process your application without having personal information about you. Your personal information is required before you can enter into the relevant contract with us, or it is required during the life of that contract, or it is required by laws that apply to us. If we already hold some of the personal information that we need – for instance if you are already a customer – we may not need to collect it again when you make another application. In all other cases we will need to collect it except where providing some personal information is optional and we will make this clear. For instance we will say in application forms or in branch or on our website or via the broker or other intermediary if alternative (such as work) telephone number contact details can be left blank.

DO WE DO ANY MONITORING INVOLVING PROCESSING OF YOUR PERSONAL INFORMATION?

In this section monitoring means any listening to, recording of, viewing of, intercepting of, or taking and keeping records (as the case may be) of calls, email, text messages, social media messages, in person face to face meetings and other communications.

We may monitor where permitted by law. In particular, where we are required by the Financial Conduct Authority's regulatory regime to record certain telephone lines (as relevant) we will do so. This may be for the reasons detailed below:

- To comply with regulatory rules, self-regulatory practices or procedures relevant to our business;
- To prevent or detect crime;
- In the interests of protecting the security of our communications systems and procedures;
- To have a record of what we have discussed with you and any actions agreed with you;
- To protect you and to provide security for you (such as in relation to fraud risks on your account); and
- For quality control and staff training purposes.

Some of our monitoring may check for obscene or profane content in communications.

We may conduct short term carefully controlled monitoring of your activities on your mortgage account or savings account where this is necessary for our legitimate interests or to comply with our legal obligations. For instance, where we suspect fraud, money laundering or other crimes.

Telephone calls between us and you in connection with your application and the mortgage product or savings product may be recorded to make sure that we have a record of what has been discussed and what your instructions are. We may also record these types of calls for quality control and staff training purposes.

FOR HOW LONG IS YOUR PERSONAL INFORMATION RETAINED BY US?

Unless we explain otherwise to you, we will hold your personal information for the following periods:

- **Retention in case of queries.**
We will retain the personal information that

- we need to keep in case of queries from you for instance, if you apply unsuccessfully for a product for 1 year unless we have to keep it for a longer period;
- **Retention in case of claims.** We will retain the personal information that we need to keep for the period in which you might legally bring claims against us which in practice means 12 years for mortgage customers;
 - **Retention in accordance with legal and regulatory requirements.** We will retain the personal information that we need to keep even after the relevant contract you have with us has come to an end for 6 years and this will be to satisfy our legal and regulatory requirements.

If you would like further information about our data retention practices, please contact our Data Protection Officer.

WHAT ARE YOUR RIGHTS UNDER DATA PROTECTION LAWS?

Here is a list of the rights that all individuals have under data protection laws. They do not apply in all circumstances. If you wish to exercise any of them we will explain at that time if they are engaged or not. The right of data portability is only relevant from May 2018.

- The **right to be informed** about the processing of your personal information;
- The right to have your personal information **corrected if it is inaccurate** and to have **incomplete personal information completed**;
- The right to **object** to processing of your personal information;
- The right to **restrict processing** of your personal information;
- The right to **have your personal information erased** (the “right to be forgotten”);
- The right to **request access** to your personal information and to obtain information about how we process it;
- The right to **move, copy or transfer your personal information** (“data portability”); and

- Rights in relation to **automated decision making which has a legal effect or otherwise significantly affects you.**

You can contact our Data Protection Officer or request the leaflet “Your Data Protection Rights” for more details on all the above. You have the right to complain to the Information Commissioner’s Office which enforces data protection laws: <https://ico.org.uk/>

If you wish to exercise any of these rights against the Credit Reference Agencies or a broker or other intermediary who is data controller in its own right, you should contact them separately.

DATA ANONYMISATION AND USE OF AGGREGATED INFORMATION

Your personal information may be converted into statistical or aggregated data which cannot be used to re-identify you. It may then be used to produce statistical research and reports. This aggregated data may be shared and used in all the ways described in this privacy notice.

YOUR MARKETING PREFERENCES AND WHAT THIS MEANS

We may use your home address, phone numbers, email address and message facilities to contact you according to your marketing preferences. This means we do this only if we have a legal ground which allows it under data protection laws – in this leaflet we have described what is our legal ground for marketing. You can stop our marketing at any time by writing to us at Buckinghamshire Building Society, High Street, Chalfont St. Giles, Buckinghamshire, HP8 4QB or by emailing us at authorise@bucksbs.co.uk or by following the instructions on how to do that in the marketing email or other communication.

Authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority. Registration No. 206022



Buckinghamshire Building Society is a member of:

The Building Societies Association
The Financial Services Compensation Scheme
The Banking Standards Board

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For more information visit our website:

www.bucksbs.co.uk

Or call us on **01494 879500**

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