

CUSTOMER PRIVACY NOTICE

YOUR PERSONAL INFORMATION AND WHAT WE DO WITH IT

WHO WE ARE AND HOW TO CONTACT US

Monmouthshire Building Society of Monmouthshire House, John Frost Square, Newport, South Wales, NP20 1PX is a data controller of your personal information. This means information that is about you or from which we can identify you. This privacy notice describes how we deal with your personal information. We are the data controller of this information under relevant data protection laws because in the context of our business relationship with you we decide how and why it is processed in the ways explained in this privacy notice. When we use terms such as **we**, **us** and **our** in this notice, we mean Monmouthshire Building Society.

If you have queries about this privacy notice or wish to exercise any of the rights mentioned in it, please visit one of our branches, telephone Customer Services on 01633 844 340, send us a secure message using our 'My Accounts' service or email dataprotection@monbs.com

You will see at the end of this privacy notice that we mention the privacy notices of Fraud Prevention Agencies and Credit Reference Agencies. We do need to share these with you. Please read them carefully and contact those organisations if you have questions (their details are in their notices).

HAVE YOU BEEN INTRODUCED TO US BY A BROKER OR OTHER INTERMEDIARY?

Our products and services are available through our own branches and on our own website as well as 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 shares your personal information with us, this privacy notice will apply and you should contact us to exercise your rights under data protection laws. Brokers or other intermediaries will also process your personal information as a data controller in their own right, and in that case their own privacy notice will then apply and you should ask them for a copy if you do not have one by the time you are introduced to us.

WHAT KINDS OF PERSONAL INFORMATION ABOUT YOU DO WE PROCESS?

This will depend on the products or services you apply for and (if your application is successful) obtain from us. Before we explain what particular information we process we will explain what information is relevant to all of our products and services including our mortgages, savings and third party insurance services.

PERSONAL INFORMATION THAT WE GENERALLY PROCESS IN CONNECTION WITH ALL CUSTOMERS FOR OUR MORTGAGE AND SAVINGS PRODUCTS AND SERVICES

This includes:

- Your title, full name, contact details, including for instance your email address, home and mobile telephone numbers;
- Your home address and correspondence address (where different from your home address);
- 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 identity documentation, national insurance number, occupation and nationality;
- Details of your personal bank account being used to pay into your Society account;
- Records of how you have contacted us and, if you get in touch with us online, details such as your IP address;

- Personal information which we obtain from Fraud Prevention Agencies (see the section on 'Fraud Prevention Agencies' below);
- Some special categories of personal data, such as about:
 - your health or if you are a vulnerable customer (more details below); and
 - information about any unspent criminal convictions, criminal proceedings or alleged offences relating to financial crime, fraud or dishonesty offences.

ADDITIONAL PERSONAL INFORMATION THAT WE PROCESS IN CONNECTION WITH ALL MORTGAGE CUSTOMERS

This includes:

- Your financial details e.g. your salary and details of other income including any expected future changes, details of your savings, details of your expenditure, details of account(s) held with other providers, the source of your deposit;
- 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 Credit Reference Agencies), court judgments decrees and administration orders made publicly available through statutory public registers (see the section on 'Credit Reference Agencies' below);
- Information about your employment status including whether you are employed, retired, or receive benefits (including any expected future changes) and the terms of your employment;
- 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, together with your recent address history and details of the property you wish to mortgage;
- Information which is relevant for your residency and/or citizenship status, such as 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;
- Where relevant, information about any guarantor which you provide in an application; and
- Details of your broker, solicitor, surveyor, estate agent, accountant, employer, current landlord.

ADDITIONAL PERSONAL INFORMATION THAT WE PROCESS IN CONNECTION WITH ALL SAVINGS CUSTOMERS

This includes:

- Where a person other than the savings account holder makes a withdrawal from the account, information about that person and the transaction;
- Details of bank accounts into which withdrawals or interest payments may be made; and
- Information about your citizenship and tax residency.

PERSONAL INFORMATION THAT WE GENERALLY PROCESS IN CONNECTION WITH ALL CUSTOMERS FOR OUR INSURANCE SERVICES

This includes:

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

All Society insurance services are currently provided through third party providers. These organisations have their own privacy notices which will contain further details on the personal information processed for this purpose.

JOINT APPLICANTS, GUARANTORS AND POWERS OF ATTORNEY

If you make a joint application with your spouse, partner, family member or another party, we will also need to collect personal information about that person.

If you make an application on behalf of such a joint applicant, you agree to show them our Summary Privacy Notice and that you have all necessary consents to enable you to provide us with their information for the purposes described. If you apply for your mortgage with a guarantor, that person will see our Summary Privacy Notice when he/she submits their own personal information to us because he/she must necessarily sign the application form.

If there is somebody who has control of your affairs e.g. power of attorney, court appointed deputy, someone with parental responsibility etc then we will provide that person with our Summary Privacy Notice when they open an account on your behalf or when they take control of your affairs.

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 share your personal information with us.

In addition, we may obtain your personal information from other sources such as Fraud Prevention Agencies, Credit Reference Agencies, your employer, landlord, accountant, other lenders, HMRC, DWP, the Land Registry, publicly available directories and information (e.g. telephone directory, social media, internet, news articles), debt recovery, IVA/Bankruptcy 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 below.

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

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

- 1) Processing necessary **to comply with our legal obligations**:
 - a) For compliance with laws that apply to us;
 - b) For the 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 checks, anti-money laundering checks, and checks with Fraud Prevention Agencies pre-application, at the application stage, and periodically after that;
 - e) 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 or a financial crime);
 - f) To carry out monitoring and to retain records, for the reasons outlined as legal requirements in the monitoring and records retention sections of this notice;

- g) To deal with requests from you to exercise your rights under data protection laws;
- h) For management of our business operations, including accounting; and
- i) When we share your personal information with these other people or organisations:
 - Any guarantor;
 - Joint account holders, Trustees and beneficiaries, and any other person with control of your affairs e.g. power of attorney, court appointed deputy, someone with parental responsibility etc;
 - 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;
 - Fraud Prevention Agencies;
 - Law enforcement agencies, auditors 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.

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

- a) All stages and activities relevant to managing your account enquiry and application. For mortgage accounts this may also include illustrations, requests for transfers of equity, setting up/changing/removing guarantors;
- b) Administering and managing your account and services relating to that, updating your records, tracing your whereabouts to contact you about your account. For a mortgage account, tracing may also be undertaken for recovering debt;
- c) Sharing your personal information with other third parties or payment services providers such as when you ask us to share information about your account with them or request an insurance service; and
- d) For some of our profiling and other automated decision making.

3) Where we consider that, on balance, it is appropriate for us do so, processing necessary **for the following legitimate interests** which apply to us and in some cases other organisations (who we list below) are:

- a) 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;
- b) To carry out searches at Credit Reference Agencies pre-application, at the application stage, and periodically after that;
- c) To carry out monitoring, including using CCTV on our premises, and to retain records, including for the reasons outlined in this notice;
- d) To administer our good governance requirements, such as internal reporting and compliance obligations, or administration required for Annual General Meeting processes;
- e) For market research and analysis and developing statistics;

- f) For direct marketing communications with details of our financial services, and related promotions, offers and events which may be of interest to you, unless you choose not to receive our marketing messages;
- g) To contact customers when their product terms are coming to an end to let them know about other products of ours which are available. We do this even if you have chosen not to receive direct marketing as we believe it is a service expected of us;
- h) To test and monitor the performance of our products, services, internal processes and operations;
- i) For some of our profiling and other automated decision making, in particular where this does not have a legal effect or otherwise significantly affect you; and
- j) When we share your personal information with these other people or organisations;
 - Any guarantor;
 - Joint account holders, trustees and beneficiaries and any person with control of your affairs e.g. power of attorney, court appointed deputy, someone with parental responsibility etc;
 - 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, insurers and auditors;
 - Financial institutions and trade associations;
 - Tax authorities who are overseas, for instance if you are subject to tax in another jurisdiction we may share your personal information directly with relevant tax authorities overseas (instead of via HMRC);
 - Other organisations and businesses who provide services to us such as debt recovery agencies, back up 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;
 - Credit Reference Agencies (see below where we explain more and refer to the Credit Reference Agency Information Notice ('CRAIN') which has been provided separately or refer to www.monbs.com/privacy for more information); and
 - Market research organisations that help us to develop and improve our products and services.

4) Processing with your **consent**:

- a) When you request that we share your personal information with someone else and consent to that;
- b) For direct marketing communications with details of products and services available in conjunction with selected third parties; and
- c) For some of our processing of special categories of personal data such as about your health, or criminal convictions, or if you are a vulnerable customer (and it will be explained to you when we ask for that explicit consent what purposes, sharing and use it is for).

5) Processing to **protect the vital interests of a person or for a substantial public interest** under laws that apply to us where this helps us to meet our broader social obligations or safeguard others, such as:

- a) Processing of 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;
- c) Processing that we need to do to prevent, detect and prosecute unlawful acts and fraudulent behaviour;
- d) When we share your personal information with other people and organisations, such as your relatives, social services, your carer, the person who has control of your affairs e.g. power of attorney, court appointed deputy, someone with parental responsibility etc, if they need to know that you are a vulnerable customer; and
- e) When we share your personal information with other organisations to help prevent and detect fraud or financial crime.

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 as outlined above. For processing that 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 us using the details above. The consequence might be that we cannot send you some marketing communications or that we cannot 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).

If you were introduced to us by a broker or intermediary, and they conduct processing that is based on your consent, you should contact them directly to withdraw your consent for what they do with your personal information as a data controller in their own right.

To comply with payment services regulations we have to share some of your personal information with other payment service providers in some circumstances, such as when you ask us to share information about your account with them. Whilst those payment services regulations mention 'consent' for this, 'consent' in that context does not have the same meaning as 'consent' under data protection laws. The legal grounds which may be relevant to this are compliance with our legal obligations, performance of our contract with you, our legitimate interests, or a combination of these.

This is why if you ask to withdraw consent from what we do with your personal information where we need to have it under the payment services regulations, we may still have to hold and use your personal information. We will give you more information if this is the case.

HOW DO WE SHARE YOUR INFORMATION?

In order to provide you with our products and services and comply with our legal obligations, we need to share your personal data with others. We have listed examples above, of who we need to share your personal information with and why this is necessary.

Wherever we share your data, we require all third parties to respect the security of your personal data and to treat it in accordance with the law.

Some of the organisations we share your personal information with (such as IT service providers that support our business) will act as "processors" of your information. These processors are not allowed to use your personal data for their own purposes and can only process your personal data for limited purposes and in accordance with our instructions.

We also need to share your personal information with other people and organisations who act as "controllers" of your information. This means they will need to determine themselves how to use your personal information lawfully.

Examples of controllers are Credit Reference Agencies and Fraud Prevention Agencies (as explained below), IVA/Bankruptcy administrators, brokers and intermediaries who provide insurance services on our behalf, insurance companies, tax authorities, financial regulators and law enforcement agencies. As controllers of your personal information, these organisations have their own privacy notices which will apply to the way in which they treat your personal information.

We may also need to share your personal information with third parties to whom we may choose to sell, transfer, or merge parts of our business. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then your personal information may only be used in the same way as set out in this privacy notice.

HOW DO WE SHARE YOUR INFORMATION WITH CREDIT REFERENCE AGENCIES?

In order to process your mortgage application, we will perform credit and identity checks on you with one or more credit reference agencies (“**CRAs**”). Where you have a mortgage with us we may also make periodic searches at CRAs to manage your account with us. To do this, we will supply your personal information to CRAs and they will give us additional information about you. This will include information from your credit application and about your financial situation and financial history. CRAs will supply to us both public (including the electoral register) and shared credit, financial situation, financial history and fraud prevention information.

We will use this information to:

- Assess your creditworthiness and whether you can afford to take the product;
- Verify the accuracy of the data you have provided to us;
- Prevent criminal activity, fraud and money laundering;
- Manage your account(s);
- Trace and recover debts; and
- Ensure any offers provided to you are appropriate to your circumstances.

We will continue to exchange personal and account 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 the information in this section, 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.

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, their data retention periods and your data protection rights with the CRAs are explained in more detail in the separate leaflet or the website link which we refer to later on in this privacy notice.

HOW DO WE SHARE YOUR INFORMATION WITH FRAUD PREVENTION AGENCIES?

This is explained in the separate leaflet “Identity Verification and Fraud Prevention Checks” or the website link which we refer to later on in this privacy notice.

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 (EEA). This might be because we are legally obliged to report details of your accounts e.g. if you are resident in an overseas country with which the UK Government has an agreement to share tax and financial information, or where we contract with IT service providers that operate internationally.

Where we contract with such providers then if your personal information is processed within Europe or other parts of the 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 EEA. Safeguards may also include requiring the recipient to subscribe to 'international frameworks' intended to enable secure data sharing and where the framework is the means of protection for the personal information.

WHAT SHOULD YOU DO IF YOUR PERSONAL INFORMATION CHANGES?

You should tell us without delay, by visiting a branch, calling Customer Services on 01633 844 340 or sending us a secure message using our 'My Accounts' service, so that we can update our records.

If you were introduced to us by a broker or other intermediary, and you want to advise them as well, you should contact them separately.

DO YOU HAVE TO PROVIDE YOUR PERSONAL INFORMATION TO US?

We are unable to provide you with mortgage or savings products 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 your application. In cases where providing some personal information is optional, we will make this clear.

DO WE DO ANY MONITORING THAT INVOLVES 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, emails, social media messages, visits to our branches including the use of CCTV, in person face to face meetings and other communications.

We may monitor where permitted by law and we will do this where the law requires it. In particular, where we are required by the Financial Conduct Authority's regulatory regime to record certain telephone lines or in person meetings (as relevant) we will do so.

Some of our monitoring may be 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 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 or savings account where this is necessary for our legitimate interests or to comply with our legal obligations. For instance, were we suspect fraud, money laundering or other crimes.

Telephone calls and/or in person meetings between us and you in connection with your application and your mortgage or savings products 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.

PROFILING AND OTHER AUTOMATED DECISION MAKING

This section is relevant where we make decisions about you using only technology, and where none of our employees or any other individuals have been involved in the process. For instance, in relation to assessing applications for accounts, monitoring transactions on your accounts, and triggers and events such as account opening anniversaries and maturity dates. We may do this to decide what marketing communications are suitable for you, to analyse statistics and assess lending and insurance risks.

We can do this activity based on our legitimate interests (and they are listed in the section about legal grounds above) only where the profiling and other automated decision making does not have a legal or other significant effect on you.

In all other cases, we can do this activity only where it is necessary for entering into or performing the relevant contract, is authorised by laws that apply to us, or is based on your explicit consent. In those cases you have the right to obtain human intervention to contest the decision. Profiling for direct marketing can mean there is a separate right to object (see 'rights to object' below).

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 or service) for one year unless we have to keep it for a longer period;
- **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 up to six years to satisfy legal and regulatory requirements, unless we have to keep it for a longer period; and
- **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 six years for savings accounts and fifteen years for mortgage accounts.

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 to be informed** about 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*");
- Rights in relation to **automated decision making which has a legal effect or otherwise significantly affects you**.

For further information please see our leaflet "Your Data Protection Rights", which is available by visiting a branch, calling Customer Services on 01633 844 340, sending us a secure message using our 'My Accounts' service or via www.monbs.com/privacy, for more details.

If you wish to exercise any of these rights against the Credit Reference Agencies, the Fraud Prevention Agencies, or a broker or other intermediary, you should contact them separately.

If you are unhappy with how we are using your personal information, or you want to complain about how we have handled a request, please raise your concerns with us using the contact details above. You also have the right to complain to the Information Commissioner's Office which enforces data protection laws: www.ico.org.uk

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.

YOUR MARKETING PREFERENCES AND WHAT THIS MEANS

We may use your home address, phone numbers, email address and message facilities in other platforms 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 – see above for details of our legal grounds for marketing. You can stop our marketing at any time by contacting us or by following the instructions on how to do that in the marketing email or other communication.

DATA PRIVACY NOTICES FROM OTHER ORGANISATIONS

We have mentioned that we share your personal information with Fraud Prevention Agencies and Credit Reference Agencies. They require us to pass on to you information about how they will use your personal information to perform their services or functions as data controllers in their own right. These notices are separate to our own. They are available from our website at www.monbs.com/privacy or in a leaflet available on request from any branch or by telephoning Customer Services on 01633 844 340.

GLOSSARY

The meaning of some terms that we use in this privacy notice:

Automated decision making means a process where we make decisions about you, such as your suitability for a product, using a computer based and automated system without a person being involved in making that decision (at least first time around).

Profiling means any form of automated processing of your personal information to evaluate certain personal aspects about you, such as to analyse or predict aspects concerning your economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

Process or **processing** includes 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.

Legitimate interests is mentioned in our privacy notice because 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.

Monmouthshire Building Society, Monmouthshire House, John Frost Square, Newport, South Wales, NP20 1PX.

Tel: 01633 844 444

Website: www.monbs.com

Monmouthshire Building Society is authorised by the Prudential Regulation Authority, and regulated by the Financial Conduct Authority and the Prudential Regulation Authority Financial Services Register Number: 206052.
Telephone calls may be monitored and/or recorded for security and training purposes.