

YOUR PERSONAL INFORMATION AND WHAT WE DO WITH IT

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 interest's legal ground for personal data processing.

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

Hanley Economic Building Society of Granville House, Forge Lane, Festival Park, Stoke on Trent 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 Hanley Economic Building Society.

Victoria Thackstone is our Data Protection Officer; she can be contacted at Hanley Economic Building Society, Granville House, Forge Lane, Festival Park, Stoke on Trent, ST1 5TB. 01782 255000 any time including if you have queries about this privacy notice or wish to exercise any of the rights mentioned in it.

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

This privacy notice may be updated from time to time. You should check this webpage regularly so that you can read the up to date version.

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 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.

Upon request by our intermediary networks/mortgage clubs, the Society will provide the following information for statistical purposes only;

Mortgage account number, client initial and surname, client address, mortgage amount, completion date, property value and product type.

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 need in relation to our mortgages and savings products we will explain what information is relevant to all of our products and services including our mortgages and savings products.

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;
- 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;
- Some special categories of personal data such as about your health or if you are a vulnerable customer (more details below).

ADDITIONAL PERSONAL INFORMATION THAT WE PROCESS IN CONNECTION WITH A MORTGAGE

This includes:

- Your financial details e.g. your salary and details of other income, 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' below);

- 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); and
- Where relevant, information about any guarantor which you provide in any application.

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

This may include:

- Your financial details e.g. Your salary and details of other income, details of your other savings, and details of account(s) held with other providers if you pay into your savings product from those other account(s);
- Where a person other than the savings account holder makes a withdrawal from the account, information about that person and the transaction; and
- Information about your tax position.

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 mentioned above about that person. You must show this privacy notice to the other applicant and ensure they confirm that they know you will share it with us for the purposes described in it. If you look now at the “What are the legal grounds” section (below) you will see reference to consent and a description of some limited scenarios where it may be relevant to what we do with personal information. If we ask you to obtain consent from the joint applicant (such as for marketing) you should do that using the consent capture mechanism that we give or make available to you for that purpose.

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

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 Credit Reference Agencies, your employer, landlord, other lenders, HMRC, DWP, publically 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. In addition, some of your personal information may come from other members of our Group if you already have a product with them.

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. We have also mentioned above in the lists of personal information that we process some of the CRAs' other sources of information (which are our own source of information too).

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 consent). Here are the legal grounds that are relevant to us:

- 1) Processing necessary **to perform our contract with you for the mortgage or savings product or for taking steps prior to entering into it during the application stage:**
 - 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 doing this for recovering debt.
 - b) Sharing your personal information with other payment services providers such as when you ask us to share information about your account with them;
 - c) All stages and activities relevant to managing your mortgage and savings account including enquiry, application, administration and management of accounts, illustrations, requests for transfers of equity, setting up/changing/removing guarantors.
 - d) For some of our profiling and other automated decision making. OR

- 2) 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) Administering and managing your mortgage and savings account and services relating to that, updating your records, tracing your whereabouts to contact you about your account and 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, 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;
 - f) To carry out monitoring and to keep records (see below);
 - g) To administer our good governance requirements and those of other members of our Group such as internal reporting and compliance obligations or administration required for AGM processes;
 - h) For market research and analysis and developing statistics;
 - i) For direct marketing communications;
 - j) When we share your personal information with these other people or organisations;
 - Your guarantor (if you have one) ;

- Joint account holders, trustees and beneficiaries and any person with power of attorney over your affairs (in each case only if relevant to you);
- Members of our Group;
- 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;
- The Intermediary network/mortgage club that your broker represents;
- Our legal and other professional advisers, auditors and actuaries;
- Financial institutions and trade associations;
- 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;
- 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, 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 a link to more information); and
- Market research organisations that help us to develop and improve our products and services.

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 or those of any other member of our Group;
- 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 carry out monitoring and to keep records (see below);
- 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);
 - 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;
 - Fraud Prevention Agencies;
 - 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 direct marketing communications;
- c) For some of our processing of special categories of personal data such as about your health 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 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.
- c) When we share your personal information with other people and organisations such as members of our Group 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. 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).

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 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.

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 the payment services regulations, we may still have to hold and use your personal information.

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 except in cases where what are called 'derogations' apply. Your personal information will be transferred to the following; India and Core System Provider (Sopra Steria LTD)

Safeguards can include: (i) the Standard Data Protection Clauses (also known as EU Model Clauses) obtain a copy of them or to find out where they have been made available you can contact our Data Protection Officer using the details above; (ii) the US Privacy Shield and details are available here: <https://www.privacyshield.gov/welcome> or you can contact our Data Protection Officer using the details above for more information; or (iii) Binding Corporate Rules provided the recipients in other countries have obtained the requisite approvals and the published list of approvals is available here: http://ec.europa.eu/justice/data-protection/international-transfers/binding-corporate-rules/bcr_cooperation/index_en.htm or you can contact our Data Protection Officer using the details above for more information.

HOW DO WE SHARE YOUR INFORMATION WITH CREDIT REFERENCE AGENCIES?

In order to process your application, we will perform credit and identity checks on you with one or more credit reference agencies ("CRAs"). Where you take banking services from 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 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 and financial history information 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 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.

The identities of the CRAs, their role 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 at the URL link which we refer to later on in this privacy notice.

WHAT SHOULD YOU DO IF YOU'RE PERSONAL INFORMATION CHANGES?

You should tell us without delay so that we can update our records. The contact details for this purpose are: Hanley Economic Building Society, Granville House, Forge Lane, Festival Park, Stoke on Trent, ST1 5TB. 01782 255000.

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 (see below) 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 the mortgage 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 your application. In all other cases we will need to collect it except as follows.

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 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 (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 account 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 between us and you in connection with your application and the mortgage and 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 the 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 transactions on your mortgage or savings account, payments into your savings account from other providers, 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 (see 'rights in relation to automated decision making which has a legal effect or otherwise significantly affects you' below). 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 3 years unless we have to keep it for a longer period (see directly below);
- **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 7 years, or in the case of possession or forbearance, 12 years. unless we have to keep it for a longer period (see directly below); and
- **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 7 years and this will be to satisfy our legal and regulatory requirements.
- **Hanley Financial Services.** We will retain the personal information for as long as necessary, normally this is until you die. Data is required to allow us, where agreed, to provide an ongoing service and to allow us, if required, to undertake future reviews and fulfil our obligations to regulators

If you would like further information about our data retention practices, 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 your 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.**

You have the right to complain to the Information Commissioner’s Office which enforces data protection laws: <https://ico.org.uk/> You can contact our Data Protection Officer or request the leaflet “Your Data Protection Rights” by visiting one of our branches or contacting us on 01782 255000 for more details on all the above.

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

YOUR MARKETING PREFERENCES AND WHAT THIS MEANS

We may use your home address, phone numbers, email address and social media (e.g. Facebook, Google 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 what is our legal ground for marketing. You can stop our marketing at any time by writing to us at Hanley Economic Building Society, Granville House, Forge Lane, Stoke on Trent, ST1 5TB, calling us on 01782 255000 or calling into any of our branches.

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 in separate leaflets that can be located on our website www.thehanley.co.uk.

WHO IS IN OUR GROUP

As at the date of this privacy notice, the members of our Group are: Hanley Economic Building Society and Hanley Financial Services. You should check our website at www.thehanley.co.uk from time to time in case of any changes to our Group.