

# HOW WE USE PERSONAL INFORMATION

The General Data Protection Regulation (GDPR) gives you more control over how your data is used, and how and when you are contacted by us.

This leaflet explains how we look after your personal information, including what you tell us about yourself, how we use that information, and what communications we may send you either in the post or on email. It also lets you know what credit and identity checks we carry out and who we use to do this for us.

That's why even if you already have a mortgage or savings account with us, or are thinking about opening a new account, it is important that you make yourself aware of your rights and how the law protects you.

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

**We, us and our** means Family Building Society, National Counties Building Society and / or Counties Home Loan Management Limited, all of Ebbisham House, 30 Church Street, Epsom, Surrey KT17 4NL.

**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, or 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.

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

We are 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.

You will see at the end of this privacy notice that we mention the privacy notices of Credit Reference Agencies (CRAs). 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).

Our Data Protection Officer can be contacted at any time by writing to the address above, including if you have queries about this privacy notice or wish to exercise any of the rights mentioned in it.

This privacy notice may be updated from time to time.

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

Our products and services are available through our head office, our branch and, for savings only, through our own websites. They are also 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 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. 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.

## 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 or 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 and / or place of birth, if this is necessary for us to comply with our legal and regulatory requirements;
- information about your occupation;
- records of how you have contacted us and, if you get in touch with us online, details such as your mobile phone location data and IP address. The IP address can be used to identify your point of access to the Internet so can reveal your general

location e.g. town / county / country;

- some special categories of personal data such as about your health or if you are a vulnerable customer (more details below); and
- where the account is applied for or held by a corporate body of which you are a director, partner or trustee, your full name and position. In addition, the personal information mentioned above if you are a shareholder, trustee (or equivalent) or other stakeholder with more than 25% of shareholding or voting rights or who otherwise exercises control over the management of the account holder.

## 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, your expenditure, and account(s) held with other providers if you pay your mortgage from those other account(s);
- details about all of your existing borrowings and loans;
- personal information about your credit history which we obtain from Credit Reference Agencies (CRAs) 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 or chargor which you provide in any application.

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

This includes:

- your financial details e.g. details of account(s) held with other providers if you pay into your savings product from those other account(s), and the other way around;
- 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, CHARGORS 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 make sure they confirm that they know you will share their personal information

with us for the purposes described in it. If you refer to 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 or chargor, that person will see this privacy notice when he / she submits his / her own personal information to us because he / she must necessarily complete an application form.

If there is somebody who has power of attorney, or similar, 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 or from a third party authorised to act on your behalf. 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 CRAs, your employer, landlord, other lenders, accountant and other professional advisers, HMRC, DWP, Land Registry, 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.

Some of the personal information obtained from CRAs will have originated from publicly accessible sources. In particular, CRAs draw on court decisions, bankruptcy registers and the electoral register (also known as the electoral roll). We

explain more about CRAs 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 or for taking steps prior to entering into it during the application stage:**

- a) administering and managing your 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 account including enquiry, application, administration and management of accounts, illustrations, requests for transfers of equity, setting up, changing and removing guarantors or chargors; and
- d) for some of our profiling. We explain more about our profiling activities below.

### 2) Processing necessary for the following **legitimate interests** which apply to us and

in some cases other organisations (who we list below), where we consider, on balance, is appropriate for us to do so:

- a) administering and managing your 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 CRAs at the application stage, and periodically after that;
- 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 Annual General Meeting processes;
- h) to help develop and improve the products and services offered to you and other customers;
- i) for market research and analysis and developing statistics;
- j) to contact you prior to the expiry of your mortgage product with details of our available mortgage products for which you are eligible or providing you with details of products available for reinvestment when your savings bond matures, for example;

- k) for some of our profiling, in particular where this does not have a legal effect or otherwise significantly affect you. We explain more about our profiling activities below; and
  - l) when we share your personal information with these other people or organisations;
    - your guarantor or chargor (if you have one);
    - any occupier or other person who is required to postpone or charge his / her rights or interests in our favour;
    - joint account holders, trustees and beneficiaries and any person with power of attorney over your affairs (in each case only if relevant to you);
    - the borrower(s), and any other person who provides property or cash as additional security or holds a linked offset account (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;
    - governmental and regulatory bodies such as HMRC, the Financial Conduct Authority, the Prudential Regulation Authority, the Ombudsman, the Land Registry and Land Charges Department, 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, property managers, conveyancers and valuers panel managers, insurers, 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;
    - CRAs (see below where we explain more); and
    - market research and other organisations who 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 and anti-money laundering checks 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 any related proceedings (in

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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 or chargor (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);
  - a person appointed by a court with responsibility over your affairs such as a deputy, curator bonis, guardian, intervener and trustee in bankruptcy;
  - the borrower(s) and any other person who provides property or cash as additional security or holds a linked offset account (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;
  - 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 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) when we offer to introduce you to one of our partners and you consent to that;
- c) when you consent to us using your personal information for a case study;
- d) for some of our marketing communications, such as to tell you about our products, services, promotions, offers and events which may be of interest to you;
- e) for some of our profiling – we explain more about our profiling activities below; and
- f) 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 we believe 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 such as members of our Group, your relatives, social services, your carer, and the person who has power of attorney over your affairs, if they need to know that you are a vulnerable customer.

### 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 on the back cover. The consequence might be that we cannot send you some communications (see 4(d) above) 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 who is processing personal information on our behalf) or if we are required to tell them when you exercise certain rights under data protection laws. Where your broker or other intermediary processes your personal information as a data controller in their own right, you should make sure you contact them directly to withdraw your consent.

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.

### 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). If it 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 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.

### HOW DO WE SHARE YOUR INFORMATION WITH CREDIT REFERENCE AGENCIES?

In order to process your application, we will perform credit (for mortgages) and identity checks (for both mortgages and savings products) on you with one or more CRAs. 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 mortgage 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:

- check your identity;
- assess your creditworthiness and whether you can afford the mortgage;



- verify the accuracy of the data you have provided to us;
- prevent criminal activity, fraud and money laundering; and
- trace and recover debts.

We will continue to exchange information about you with CRAs while you have a mortgage with us. This will include details of your repayments and whether you repay in full and on time. This information may be supplied to other organisations by CRAs.

When CRAs receive a credit 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 requests 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, data retention periods and your data protection rights with the CRAs are explained in more detail below.

## WHAT SHOULD YOU DO IF YOUR PERSONAL INFORMATION CHANGES?

You should tell us without delay so that we can update our records.

If you were introduced to us by a broker or other intermediary who is a 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 cases where providing some personal information is optional, we will make this clear. For instance, we will say in application forms 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 and other communications.

We may monitor where permitted by law and where the law requires it. In particular, where we are required by the Financial Conduct Authority's regulatory regime to record certain telephone calls 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).

Telephone calls may be recorded to make sure that we have a record of what has been discussed and what your instructions are.

Both telephone call recording and monitoring may be conducted 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 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.

### PROFILING

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 decision making process. We may do this:

- when you apply for a mortgage or open an account with us, to check that you meet the conditions needed to have the mortgage or account. This may include checking age, residency, nationality or financial position;
- to decide what marketing communications are suitable for you;
- to place you in groups with similar customers. This helps us to design products and services for different customers and to manage our relationships with them; and
- to analyse statistics.

We can do this activity based on our legitimate interests only where the profiling does not have a legal or other significant effect on you. Profiling for direct marketing can mean there is a separate right to object (see 'What are your rights' 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 keep your personal information in case of queries from you (for instance, if you apply unsuccessfully for a product or service) for up to two years unless we have to keep it for a longer period (see directly below);
- **Retention in case of claims.** We will keep your personal information for the period in which you might legally bring complaints or claims against us which in practice means:
  - if you are a savings customer, for six years after your relationship with us has ended
  - if you are a mortgage customer, for twelve years after your relationship with us has ended;
- if you are both a savings and mortgage customer, for between six and twelve years after your relationship with us has ended, depending on the respective closure dates of your mortgage and savings accounts unless we have to keep it for a longer period (see directly below); and
- **Retention in accordance with legal, regulatory or technical reasons.** We may keep your personal information for a longer period if we cannot delete it for legal, regulatory or technical reasons.

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 apply or not.

- 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**.

More details on the above are available on our website, [familybuildingsociety.co.uk/rights](https://familybuildingsociety.co.uk/rights) or on request. You may also contact our Data Protection Officer.

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

Please let us know if you are unhappy with how we have used your personal information. You also have the right to complain to the Information Commissioner’s Office which enforces data protection laws: <https://ico.org.uk/>

## 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 using the details on the back cover or by following the instructions in the marketing email or other communication.

## DATA PRIVACY NOTICES FROM OTHER ORGANISATIONS

We have mentioned that we share your personal information with CRAs. 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. This notice is separate to our own and is set out below.

## WHO IS IN OUR GROUP

As at the date of this privacy notice, the members of our Group are:

- Family Building Society (a trading name of National Counties Building Society)
- National Counties Building Society
- Counties Home Loan Management Limited

You should check our website at [familybuildingsociety.co.uk](https://familybuildingsociety.co.uk) from time to time in case of any changes to our Group.

### CREDIT REFERENCE AGENCY INFORMATION NOTICE (CRAIN)

VERSION: 1

ADOPTED: 23RD OCTOBER 2017

**NOTE:** The information in this document will be effective from the Adopted Date set out above, except for the information in Sections 9, (data portability right), 11 and 12. These Sections provide information on new rights that will only come into effect from the 25th May 2018, which is the effective date of the General Data Protection Regulation (or the GDPR).

This document describes how the three main credit reference agencies Callcredit, Equifax and Experian, (also called “credit reference agencies” or “CRAs” in this document) each use and share personal data (also called ‘bureau data’) they receive about you and/or your business that is part of or derived from or used in credit activity.

**Please note:** you shouldn’t think of this document as a complete record of all the personal data each CRA may hold and process, as each has a number of different business functions running through it. To find out more about each CRA’s other businesses, services and personal data processing, go to the website links provided at Section 14 below.

This document answers these questions:

1. Who are the credit reference agencies and how can I contact them?
2. What do credit reference agencies use personal data for?
3. What are the credit reference agencies’ legal grounds for handling personal data?
4. What kinds of personal data do credit reference agencies use, and where do they get it?
5. Who do credit reference agencies share personal data with?
6. Where is personal data stored and sent?
7. How long is personal data kept for?
8. Do the credit reference agencies make decisions about me or profile me?
9. What can I do if I want to see the personal data held about me? Do I have a ‘data portability’ right in connection with my bureau data?
10. What can I do if my personal data is wrong?
11. Can I object to the use of my personal data and have it deleted?
12. Can I restrict what the credit reference agencies do with my personal data?
13. Who can I complain to if I’m unhappy about the use of my personal data?
14. Where can I find out more?

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**You have the right to object to credit reference agencies using your personal data.**

**Please see Section 11 to find out more.**

## 1. WHO ARE THE CREDIT REFERENCE AGENCIES AND HOW CAN I CONTACT THEM?

There are three main credit reference agencies in the UK who deal with people's personal data.

Each is regulated by the Financial Conduct Authority ("FCA") and authorised to conduct business as a credit reference agency.

| CREDIT REFERENCE AGENCY   | CONTACT DETAILS     |   |
|---------------------------|---------------------|---|
| <b>Callcredit Limited</b> | <b>Post:</b>        | Callcredit Information Group, One Park Lane, Leeds, West Yorkshire LS3 1EP  |
|                           | <b>Web Address:</b> | <a href="http://www.callcredit.co.uk/consumer-solutions/contact-us">http://www.callcredit.co.uk/consumer-solutions/contact-us</a>                             |
|                           | <b>Email:</b>       | consumer@callcreditgroup.com  |
|                           | <b>Phone:</b>       | 0330 024 7574   |
| <b>Equifax Limited</b>    | <b>Post:</b>        | Equifax Ltd, Customer Service Centre, PO Box 10036, Leicester, LE3 4FS  |
|                           | <b>Web Address:</b> | <a href="https://www.equifax.co.uk/Contact-us/Contact_Us_Personal_Solutions.html">https://www.equifax.co.uk/Contact-us/Contact_Us_Personal_Solutions.html</a> |
|                           | <b>Email:</b>       | <a href="http://www.equifax.co.uk/ask">www.equifax.co.uk/ask</a>  |
|                           | <b>Phone:</b>       | 0333 321 4043 or 0800 014 2955  |
| <b>Experian Limited</b>   | <b>Post:</b>        | Experian, PO BOX 9000, Nottingham, NG80 7WF   |
|                           | <b>Web Address:</b> | <a href="http://www.experian.co.uk/consumer/contact-us/index.html">http://www.experian.co.uk/consumer/contact-us/index.html</a>                               |
|                           | <b>Email:</b>       | consumer.helpservice@uk.experian.com  |
|                           | <b>Phone:</b>       | 0344 481 0800 or 0800 013 8888  |

## 2. WHAT DO CREDIT REFERENCE AGENCIES USE PERSONAL DATA FOR?

### (A) CREDIT REFERENCE AGENCY PROCESSING

Credit reference agencies receive personal data about you that's part of, derived from or used in credit activity. Different lenders and creditors will use different CRA services, and may not use all the services described here, so we recommend you also check your lender and creditor's privacy policy(s) as well as this document.

#### Credit reporting and affordability checks

Each CRA uses the data it gathers to provide credit reporting services to its clients.

Organisations use credit reporting services to see the financial position of people and businesses. For example, a lender or creditor may check with a credit reference agency when an individual or business applies for credit and the lender or creditor needs to make a credit decision taking into account that person or business's credit history.

Affordability checks help organisations understand whether people applying for credit or financial products (like loans) are likely to afford the repayments.

These activities help promote responsible lending, prevent people and businesses from getting into more debt than they can afford, and reduce the amount of unrecoverable debt and insolvencies.

#### Verifying data like identity, age and residence, and preventing and detecting criminal activity, fraud and money laundering

The CRAs also use bureau data to provide verification, crime prevention and detection services to their clients, as well as fraud and anti-money laundering services. For example:

- When a person applies to an organisation for a product or service, the organisation might ask them

to answer questions about themselves, and then check the answers against the data held by the CRAs to see if they're correct. This helps confirm the person they are dealing with is not trying to commit identity theft or any other kind of fraud.

- Where some products and services are only available to people of a certain age, organisations can check whether the person they're dealing with is eligible by searching the CRAs databases.
- If a person applies for credit the lender or creditor might check the personal data that person gives them against the personal data held by CRAs to try and prevent fraud.
- Government and quasi-government bodies can use data held by CRAs to check whether people are entitled to certain benefits and to help recover unpaid taxes, overpaid benefits and similar debts.

#### Account management

CRAs supply information including personal data to their clients for account management, which is the ongoing maintenance of the client organisation's relationship with its customers. This could include activities designed to support:

- data accuracy (such as data cleansing - where bureau data can be used to clean or update lender data. This might involve checks that data is in the right format or fields, or to correct spelling errors);
- clients' ongoing account management activities. (For example, data sharing with lenders and creditors so clients can make decisions relating to credit limit adjustments, transaction authorisations, and to identify and manage the accounts of customers at risk, in early stress, in arrears, or going through a debt collection process, or to confirm that assets are connected to the right person).

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## Tracing and debt recovery

CRA's provide services that allow organisations to use bureau data to trace people who've moved. Each CRA also offers a service that allows people to be reunited with assets (like an old dormant savings account they've lost contact with).

CRA's may also use personal data to support debt recovery and debtor tracing. An example of a tracing activity could be when a person owes money and moves house without telling the creditor where they've gone. The creditor may need help finding that person to claim back what they're owed. CRA's help find missing debtors by providing creditors with updated addresses and contact details.

## Screening

CRA's can use some personal data to screen people out of marketing lists. For example, where a person's financial history suggests they're unlikely to be accepted for or afford a particular product, the relevant organisation can use that data to opt out of sending them information about that product. This helps stop people receiving irrelevant marketing, and saves organisations the costs of inappropriate marketing and unsuccessful applications.

The data isn't used to identify, select and send marketing materials to potential new customers.

## Statistical analysis, analytics and profiling

CRA's can use and allow the use of personal data for statistical analysis and analytics purposes, for example, to create scorecards, models and variables in connection with the assessment of credit, fraud, risk or to verify identities, to monitor and predict market trends, to allow use by lenders for refining lending and fraud strategies, and for analysis such as loss forecasting.

## Database activities

CRA's carry out certain processing activities internally which support databases effectiveness and efficiencies. For example:

- **Data loading:** where data supplied to the CRA's is checked for integrity, validity, consistency, quality and age help make sure it's fit for purpose. These checks pick up things like irregular dates of birth, names, addresses, account start and default dates, and gaps in status history.
- **Data matching:** where data supplied to the CRA's is matched to their existing databases to help make sure it's assigned to the right person, even when there are discrepancies like spelling mistakes or different versions of a person's name. CRA's use the personal data people give lenders together with data from other sources to create and confirm identities, which they use to underpin the services they provide.
- **Data linking:** as CRA's compile data into their databases, they create links between different pieces of data. For example, people who appear financially associated with each other may be linked together, and addresses where someone has previously lived can be linked to each other and to that person's current address.
- **Systems and product testing:** data may be used to help support the development and testing of new products and technologies.

Each CRA has its own processes and standards for data loading, data matching and other database processing activities.

## Other uses with your permission

From time to time CRA's may use the personal data they hold or receive about you for other purposes where you've given your consent.

## Uses as required by or permitted by law

Your personal data may also be used for other purposes where required or permitted by law.

## Other activities

Each credit reference agency also has other lines of business not described in this document. For

example, each offers its own marketing services and direct-to-consumer services. Each CRA will provide separate information as appropriate for any services that fall outside of scope of this document.

### (B) WHAT IS A FRAUD PREVENTION AGENCY?

A Fraud Prevention Agency (FPA) collects, maintains and shares, data on known and suspected fraudulent activity. All three credit reference agencies also act as FPAs.

### (C) FRAUD PREVENTION AGENCY PROCESSING

How data *may* be used by fraud prevention agencies:

FPAs may supply the data received from lenders and creditors about you, your financial associates and your business (if you have one) to other organisations (please see Section 5 for more information on these organisations). This may be used by them and the CRAs to: -

- Prevent crime, fraud and money laundering by, for example:
  - Checking details provided on applications for credit and credit related or other products and services
  - Managing credit and credit related accounts or products or services
  - Cross-checking details provided on proposals and claims for all types of insurance
  - Checking details on applications for jobs or as part of employment
- Verify your identity if you or your financial associate applies for facilities including all types of insurance proposals and claims
- Trace your whereabouts and recover debts that you owe

- Conduct other checks to prevent or detect fraud
- Undertake statistical analysis and system testing
- Your personal data may also be used for other purposes where you've given consent or where required or permitted by law.



### 3. WHAT ARE THE CREDIT REFERENCE AGENCIES' LEGAL GROUNDS FOR HANDLING PERSONAL DATA?

#### LEGITIMATE INTERESTS

The UK's data protection law allows the use of personal data where its purpose is legitimate and isn't outweighed by the interests, fundamental rights or freedoms of data subjects.

The law calls this the Legitimate Interests condition for personal data processing.

The Legitimate Interests being pursued here are:

| INTEREST   | EXPLANATION  |
|--|--|
| <b>Promoting responsible lending and helping to prevent over-indebtedness.</b>                           | Responsible lending means that lenders only sell products that are affordable and suitable for the borrowers' circumstances. CRAs help ensure this by sharing personal data about potential borrowers, their financial associates where applicable, and their financial history. A comprehensive range of measures exists in the UK to underpin the balance so the legitimate interests aren't outweighed by the interests, fundamental rights and freedoms of data subjects. Further explanation about this balance is set out below. |
| <b>Helping prevent and detect crime and fraud and anti-money laundering services and verify identity</b> | CRAs provide identity, fraud and anti-money laundering services to help clients meet legal and regulatory obligations, and to the benefit of individuals to support identity verification and support of detection/prevention of fraud and money laundering.   |
| <b>Supporting tracing and collections</b>  | CRAs provide services that support tracing and collections where there is a legitimate interest in the client conducting activity to find its customer and to recover the debt, or to reunite, or confirm an asset is connected with, the right person.  |
| <b>Complying with and supporting compliance with legal and regulatory requirements</b>                   | CRAs have to comply with various legal and regulatory requirements. CRA services also help other organisations comply with their own legal and regulatory obligations. One example, many kinds of financial services are regulated by the Financial Conduct Authority or the Prudential Regulation Authority, who impose obligations to check that financial products are suitable for the people they are being sold to. The credit reference agencies provide data to help with those checks.  |

The CRAs use of this personal data is subject to an extensive framework of safeguards that help make sure that people's rights are protected. These include the information given to people about how their personal data will be used and how they can exercise their rights to obtain their personal data, have it corrected or restricted, object to it being processed, and complain if they're dissatisfied. These safeguards help sustain a fair and appropriate balance so the CRAs' activities don't override the interests, fundamental rights and freedoms of data subjects.

**4. WHAT KINDS OF PERSONAL DATA DO CREDIT REFERENCE AGENCIES USE, AND WHERE DO THEY GET IT?**

Each credit reference agency obtains and uses information from different sources, so they often hold different information and personal data from each other. However, most of the personal data they do hold falls into the categories outlined below from the sources described.

| INFORMATION TYPE          | DESCRIPTION   | SOURCE  |
|---------------------------|---|---|
| <p><b>Identifiers</b></p> | <p>CRA's hold personal data that can be used to identify people, like their name, date of birth, and current and previous addresses.</p> <p>They may also hold business data.</p> | <p>This personal data is included with all the other data sources. For example, names, addresses and dates of birth are attached to financial account data so it can be matched and associated with all the other data the CRA holds about the relevant person.</p> <p>Data about UK postal addresses is also obtained from sources like Royal Mail.</p> <p>CRA's also obtain copies of the electoral register containing the names and addresses of registered voters from local authorities across the UK in accordance with specific legislation.</p> <p>CRA's also have access to public data sources on people and businesses, including from the Insolvency Service, Companies House and commercial business directories.</p> |

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|  |  |  |
|--|--|--|
| <p><b>Lender-provided and creditor provided data</b></p>   | <p>CRA's receive information that includes personal data from credit applications and about the financial accounts that people hold from the organisations that maintain those accounts. This includes personal data about bank accounts, credit card accounts, mortgage accounts and other agreements that involve a credit arrangement like utilities and communications contracts (including mobile and internet).</p> <p>The collected data includes the name of the organisation the account is held with, the date it was opened, the account number, the amount of debt outstanding (if any), any credit limits and the repayment history on the account, including late and missing payments.</p> <p>CRA's may also receive data about financial accounts like current accounts, credit cards or loans and may receive payments information that businesses hold from the organisations who maintain those accounts.</p> | <p>Banks, building societies, lenders and other financial services providers supply data including personal data about peoples' financial accounts and repayments. Other credit providers, such as hire purchase companies, utilities companies, mobile phone networks, retail and mail order, and insurance companies also provide this data when they agree credit facilities with their customers.</p> <p>These organisations may also provide Cifas markers when they suspect fraud. You can find out more about Cifas markers in the Fraud prevention indicators section below.</p> |
| <p><b>Court judgments, decrees and administration orders</b></p>   | <p>CRA's obtain data about court judgments that have been issued against people. This may include, for example, the name of the court, the nature of the judgment, how much money was owed, and whether the judgment has been satisfied.</p>   | <p>The government makes court judgments and other decrees and orders are made publicly available through statutory public registers. These are maintained by Registry Trust Limited, which also supplies the data on the registers to the CRA's.</p>   |
| <p><b>Bankruptcies, Individual Voluntary Arrangement (IVAs), debt relief orders and similar events</b></p> | <p>CRA's obtain data about insolvency-related events that happen to people and may also obtain this type of data about businesses. This includes data about bankruptcies, IVAs and debt relief orders, and in Scotland it includes sequestrations, trust deeds and debt arrangement schemes. This data includes the start and end dates of the relevant insolvency or arrangement.</p>   | <p>CRA's obtain this data from The Insolvency Service, the Accountant in Bankruptcy, The Stationary Office and Northern Ireland's Department for the Economy – Insolvency Service, the London, Belfast and Edinburgh Gazettes.</p> <p>Business bankruptcies data are obtained from the London, Belfast and Edinburgh Gazettes.</p>   |

*continued...*

## HOW WE USE PERSONAL INFORMATION

|  |   |   |
|--|---|---|
| <b>Fraud prevention indicators</b>       | <p>The CRAs are all Fraud Prevention Agencies (FPAs) and members of Cifas (<a href="http://www.cifas.org.uk">www.cifas.org.uk</a>), an organisation that collects and shares data about suspected fraud. When an organisation believes it's detected fraud or an attempted fraud, it may put a Cifas marker on the relevant person's credit file to warn other lenders this identity may have been used fraudulently. This helps to prevent any further fraud and protect innocent consumers.</p>   | <p>These fraud indicators are shared among Cifas members through the database held by Cifas.</p>  |
| <b>Gone Away Data Network indicators</b> | <p>Some CRAs are members of the Gone Away Data Network (GAIN), a database of people with overdue outstanding debts who've moved without giving their lender a forwarding address. Data from GAIN, including the persons' old addresses and any known new addresses, may be recorded on the relevant credit file.</p>  | <p>CRAs obtain GAIN data from lenders, and additional address data is obtained from Royal Mail.</p>   |
| <b>Search footprints</b>                 | <p>When an organisation uses a CRA to make enquiries about a particular person, the CRA keeps a record of that enquiry which appears on the person's credit file. This includes the name of the organisation, the date, and the reason they gave for making the enquiry.</p>  | <p>CRAs generate search footprints when enquiries are made about a particular person. The organisation making the enquiry provides some of the data in the footprint (such as the reason for the enquiry).</p>          |
| <b>Scores and ratings</b>                | <p>CRAs may use the data they receive to produce scores and ratings including credit, affordability, risk, fraud and identity, screening, collections and insolvency scores about people and businesses and credit ratings about people. Organisations that obtain data from CRAs may use it together with other data to provide their own scores and ratings.</p> <p>Credit scores and credit ratings are produced from data like the person's credit commitments, whether they have made repayments on time, whether they've any history of insolvencies or court judgments, and how long they've lived at their current address. Each CRA has its own way of calculating credit scores, and most lenders have their own scoring systems too.</p> | <p>The CRAs produce their scores and ratings using the data available to them.</p> <p>Similarly, other organisations create their own scores and ratings from data obtained from the CRAs as well as other sources.</p> |

*continued...*

|   |   |   |
|---|---|---|
| <b>Other supplied data</b>                  | CRAs receive data from reputable commercial sources. This includes phone number data and politically exposed persons (PEPs) and sanctions data.   | CRAs receive this data from reputable commercial sources as agreed from time to time. |
| <b>Other derived data</b>                   | <p>The CRAs produce some other kinds of data themselves to manage their databases efficiently and ensure that all the relevant data about a person is on the correct credit file.</p> <p><b>Address links:</b> when a CRA detects that a person seems to have moved house, it may create and store a link between the old and new address.</p> <p><b>Aliases:</b> when a CRA believes that a person has changed their name, it may record the old name alongside the new one.</p> <p><b>Financial associations and linked people:</b> when a CRA believes two or more people are financially linked with each other (for example, because they have a joint account), it may record that fact.</p> <p><b>Flags and triggers:</b> through analysis of other data, CRAs can add indicators to credit files. These aim to summarise particular aspects of a person's financial situation. For example, a Cifas flag protects those who've been flagged as subject to fraud, and invites additional checks as a defence against further fraud risk.</p> | The CRAs generate this data from the data sources available to them.                  |
| <b>Data provided by the relevant people</b> | People sometimes provide data directly to CRAs. For example, they can ask a CRA to add a supplementary statement to their credit file if they want to explain the reason for a particular entry on the file. The right to do this is explained in Section 10 below.   | This data is provided directly by the relevant people.                                |

### 5. WHO DO CREDIT REFERENCE AGENCIES SHARE PERSONAL DATA WITH?

This section describes the types of recipient each credit reference agency can share data with. Each CRA has its own access control processes in place. For example, before it shares data with any other organisation, to check that organisation's identity and, where applicable, to confirm where it is registered with regulators.

In many cases where an organisation uses CRA services, there will be information accessible, for example, from website or at point of application or service, to explain that an organisation may check your data with a credit reference agency (for things like identity authentication and fraud checking). In some cases, some organisations have the ability to compel CRAs, by law, to disclose certain data for certain purposes.

#### Members of the credit reference agency data sharing arrangements

Each organisation that shares financial data with the CRAs is also entitled to receive similar kinds of financial data contributed by other organisations. These organisations are typically banks, building societies, and other lenders, as well as other credit providers like utilities companies and mobile phone networks.

#### Fraud Prevention Agencies

If a CRA believes that fraud has been or might be committed, it may share data with fraud prevention agencies (FPAs). These FPAs collect, maintain and share data on known and suspected fraudulent activity. Some CRAs also act as FPAs.

#### Resellers, distributors and agents

CRAs sometimes use other organisations to help provide their services to clients and may provide personal data to them in connection with that purpose.

#### Other organisations

Some data, where permitted in accordance with industry rules or where it's public information, can be shared with other organisations that have a legitimate use for it - ID verification services, for example.

#### Public bodies, law enforcement and regulators

The police and other law enforcement agencies, as well as public bodies like local and central authorities and the CRAs' regulators, can sometimes request the credit reference agencies to supply them with personal data. This can be for a range of purposes such as preventing or detecting crime, fraud, apprehending or prosecuting offenders, assessing or collecting tax, investigating complaints or assessing how well a particular industry sector is working.

#### Processors

The CRAs may use other organisations to perform tasks on their own behalf (for example, IT service providers and call centre providers).

#### Individuals

People are entitled to obtain copies of the personal data the CRAs hold about them. You can find out how to do this in Section 9 below.

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## 6. WHERE IS PERSONAL DATA STORED AND SENT?

The three CRAs are all based in the UK, and keep their main databases there. They may also have operations elsewhere inside and outside the European Economic Area, and personal data may be accessed from those locations too. In both cases, the personal data use in those locations is protected by European data protection standards.

Sometimes the CRAs will need to send or allow access to personal data from elsewhere in the world. This might be the case, for example, when a processor or client of the CRA is based overseas or uses overseas data centres.

While countries in the European Economic Area all ensure a high standard of data protection law, some parts of the world may not provide the same level of legal protection when it comes to personal data. As a result, when a CRA does send personal data overseas it will make sure suitable safeguards are in place in accordance with European data protection requirements, to protect the data. For example, these safeguards might include:

- Sending the data to a country that's been approved by the European authorities as having a suitably high standard of data protection law. Examples include the Isle of Man, Switzerland and Canada.
- Putting in place a contract with the recipient containing terms approved by the European authorities as providing a suitable level of protection.
- Sending the data to an organisation which is a member of a scheme that's been approved by the European authorities as providing a suitable level of protection. One example is the Privacy Shield scheme agreed between the European and US authorities. Another example is Binding Corporate Rules.

If your data has been sent overseas like this, you can find out more about the safeguards used from the CRAs, whose contact details are in Section 1 above.

### 7. FOR HOW LONG IS PERSONAL DATA RETAINED?

#### Identifiers

Identification data like names and addresses are kept while there's a continuing need to keep it. This need will be assessed on a regular basis, and data that's no longer needed for any purpose will be disposed of.

#### Financial accounts and repayment data

Data about live and settled accounts is kept on credit files for six years from the date they're settled or closed. If the account is recorded as defaulted, the data is kept for six years from the date of the default.

#### Court judgments, decrees and administration orders

Generally, court judgments and other decrees and orders are kept on credit files for six years from the date of the judgment, decree or order. But, they can be removed if the debt is repaid within one calendar month of the original date or if the judgment is set aside or recalled by the courts.

#### Bankruptcies, IVAs, debt relief orders and similar events

Data about bankruptcies, IVAs and other insolvency-related events and arrangements are usually kept on credit files for six years from the date they begin. This period is extended if they last longer than six years. Some data, such as a bankruptcy restrictions order, can also remain on the credit file for longer than six years.

Although the start of these events is automatically reported to the CRAs, the end (such as a discharge from bankruptcy or completion of an IVA) might not be. This is why people are advised to contact the CRAs when this happens to make sure their credit files are updated accordingly.

#### Search footprints

The CRAs keep search footprints for different lengths of time. Experian and Equifax keep most

search footprints for one year from the date of the search, although they keep debt collection searches for up to two years. Callcredit keeps search footprints for two years from the date of the search.

#### Scores and ratings

CRAs may keep credit scores and credit ratings for as long as they keep a credit file about the relevant person.

#### Derived or created data

CRAs also create data, and links and matches between data. For example, CRAs keep address links and aliases for as long as they're considered relevant for credit referencing purposes.

Links between people are kept on credit files for as long as the CRA believes those individuals continue to be financially connected. When two people stop being financially connected, either can write to the CRA and ask for the link to be removed. The CRA will then follow a process to check the people are no longer associated with each other.

#### Other data

Other third party supplied data such as politically exposed persons (PEPs) and sanctions data and mortality data will be stored for a period determined by criteria such as the agreed contractual terms.

#### Archived data

CRAs may hold data in an archived form for longer than the periods described above, for things like research and development, analytics and analysis, (including refining lending and fraud strategies, scorecard development and other analysis such as loss forecasting), for audit purposes, and as appropriate for establishment, exercise or defence or legal claims. The criteria used to determine the storage period will include the legal limitation of liability period, agreed contractual provisions, applicable regulatory requirements and industry standards.



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## 8. DO THE CREDIT REFERENCE AGENCIES MAKE DECISIONS ABOUT ME OR PROFILE ME?

### Lending decisions

CRA's don't tell a lender if it should offer you credit – this is for the lender to decide. Credit reference agencies provide data and analytics that help lenders make decisions about lending. The scoring tools and data CRA's provide may profile you, and are often a valuable tool in the lender's overall processes and with the criteria they use to make their decisions. A lender's own data, knowledge, processes and practices will also generally play a significant role in that lender's business decisions - and lender decisions will always remain for lenders to make.

The same analytics from a CRA may lead to different decisions from different lenders, as they can place differing importance on some factors than others. That's why you may receive a "yes" from one lender but a "no" from another.

The data CRA's provide is just one of the things that a lender might take into account when they make a lending decision. The lender might also take into account data provided by the person applying for credit, as well as any other data available to the lender from other sources. Each lender will have its own criteria for deciding whether or not to lend.

### Scores and ratings

When requested, CRA's do use the data they obtain to produce credit, risk, fraud, identity, affordability, screening, collection and/or insolvency scores and credit ratings; these are explained in Section 4 above. CRA's don't tell a lender if it should offer you credit – this is for the lender to decide. Each credit reference agency, and each lender, will have its own criteria for how to calculate a credit score, but the following factors will usually have an effect:

- How long the person has lived at their address.
- The number and type of credit agreements and how they use those credit products.

- Whether the person has been late making payments.
- Whether the person has had any court judgments made against them.
- Whether the person has been bankrupt or had an IVA or other form of debt-related arrangement.

The CRA's may provide or make available further information on profiling where necessary from time to time.

### 9. WHAT CAN I DO IF I WANT TO SEE THE PERSONAL DATA HELD ABOUT ME? DO I HAVE A 'PORTABILITY RIGHT' IN CONNECTION WITH MY BUREAU DATA?

#### DATA ACCESS RIGHT

You have a right to find out what personal data the credit reference agencies hold about you.

Each CRA provides more information about access rights on their websites.

|                    |  |
|--------------------|--|
| <b>CALLCREDIT:</b> | <p><b>To get online information:</b><br/><a href="http://www.callcredit.co.uk/consumer-solutions/contact-us">http://www.callcredit.co.uk/consumer-solutions/contact-us</a></p> <p><b>To make a request by post:</b><br/>Callcredit Limited, Consumer Services Team, PO Box 491, Leeds, LS3 1WZ</p> |
| <b>EQUIFAX:</b>    | <p><b>To get online information:</b><br/><a href="https://www.equifax.co.uk">https://www.equifax.co.uk</a></p> <p><b>To make a request by post:</b><br/>Equifax Ltd, Customer Service Centre, PO Box 10036, Leicester, LE3 4FS.</p>  |
| <b>EXPERIAN:</b>   | <p><b>To get online information:</b><br/><a href="http://www.experian.co.uk/consumer/contact-us/index.html">http://www.experian.co.uk/consumer/contact-us/index.html</a></p> <p><b>To make a request by post:</b><br/>Customer Support Centre, Experian Ltd, PO BOX 9000, Nottingham, NG80 7WF</p> |

**NOTE:** The information in this document will be effective from the Adopted Date set out on the first page, except for the information in this Section 9 (data portability right), and in Sections 11 and 12. These Sections provide information on new rights that will only come into effect from the 25th May 2018, which is the effective date of the General Data Protection Regulation (GDPR).

#### DATA PORTABILITY RIGHT

New data protection legislation also contains a right to data portability that may give consumers a right in some data processing contexts, to receive their personal data in a portable format when it's processed on certain grounds, such as consent.

This is not a right that will apply to bureau data because this data is processed on the grounds of legitimate interests. To find out more about legitimate interests please go to Section 3 above.

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## 10. WHAT CAN I DO IF MY PERSONAL DATA IS WRONG?

When the CRAs receive personal data, they perform lots of checks on it to try and detect any defects or mistakes. Ultimately, though, the credit reference agencies rely on the suppliers to provide accurate data.

If you think that any personal data a CRA holds about you is wrong or incomplete, you have the right to challenge it. It's worth knowing that the CRA won't have the right to change the data without permission from the organisation that supplied it, so the credit reference agency will need to take reasonable steps to check the data first,

such as asking the organisation that supplied it to check and confirm its accuracy.

If the data does turn out to be wrong, the CRA will update its records accordingly. If the CRA still believes the data is correct after completing their checks, they'll continue to hold and keep it - although you can ask them to add a note to your file indicating that you disagree or providing an explanation of the circumstances.

If you'd like to do this, you should contact the relevant CRA using their contact details in Section 1 above.

## 11. CAN I OBJECT TO THE USE OF MY PERSONAL DATA AND HAVE IT DELETED?

**NOTE:** The information in this document will be effective from the Adopted Date set out on the first page, except for the information in Section 9, (data portability right), this Section 11 and in Section 12. These Sections provide information on new rights that will only come into effect from the 25th May 2018, which is the effective date of the General Data Protection Regulation (GDPR).

This section helps you understand how to use your data protection rights to object to your personal data being used and how to ask for it to be deleted, in connection with bureau data. To understand these rights and how they apply to the processing of bureau data, it's important to know that the CRAs hold and process personal information in bureau data under the Legitimate Interests ground for processing (see Section 4 above for more information about this), and don't rely on consent for this processing.

You have the right to lodge an objection about the processing of your personal data to a CRA. If you want to do this, you should contact the relevant CRA using the contact details set out in Section 1 above.

Whilst you have complete freedom to contact a CRA with your objection at any time, you should know that under the General Data Protection

Regulation, your right to object doesn't automatically lead to a requirement for processing to stop, or for personal data to be deleted, in all cases.

Please note that, because of the importance of the credit referencing industry to the UK's financial system, and the important purposes the personal data is needed for (like supporting responsible lending, and preventing over indebtedness, fraud and money laundering) it will be very rare that the CRAs do not have compelling, overriding grounds to carry on using the personal data following an objection. In many cases, it won't be appropriate for the CRAs to restrict or to stop processing or delete bureau data, for example, where the result would be to hide a poor credit history that could enable a person or organisation to get credit they otherwise wouldn't be eligible for.

### 12. CAN I RESTRICT WHAT THE CREDIT REFERENCE AGENCIES DO WITH MY PERSONAL DATA?

**NOTE:** The information in this document will be effective from the Adopted Date set out on the first page, except for the information in Section 9, (data portability right), Section 11 and in this Section 12. These Sections provide information on new rights that will only come into effect from the 25th May 2018, which is the effective date of the General Data Protection Regulation (GDPR).

In some circumstances, you can ask credit reference agencies to restrict how they use your personal data. Your rights are set out at Article 18 of the GDPR. You can find the contact details for each CRA in Section 1 above.

This is not an absolute right, and your personal data may still be processed where certain grounds exist. This is:

- With your consent;
- For the establishment, exercise, or defence of legal claims;
- For the protection of the rights of another natural or legal person;
- For reasons of important public interest.

Only one of these grounds needs to be demonstrated to continue data processing.

The CRAs will consider and respond to requests they receive, including assessing the applicability of these exemptions.

Please note that given the importance of complete and accurate credit records, for purposes including for responsible lending, it will usually be appropriate to continue processing credit report data – in particular, to protect the rights of another natural or legal person, or because it's an important public interest of the union or member state.

## 13. WHO CAN I COMPLAIN TO IF I'M UNHAPPY ABOUT THE USE OF MY PERSONAL DATA?

Each credit reference agency tries to ensure they deliver the best customer service levels but if you're not happy you should contact them so they can investigate your concerns.

| CREDIT REFERENCE AGENCY   | CONTACT DETAILS |  |
|---------------------------|-----------------|--|
| <b>Callcredit Limited</b> | <b>Post:</b>    | Callcredit Information Group, One Park Lane, Leeds, West Yorkshire LS3 1EP |
|                           | <b>Email:</b>   | customer.relations@callcreditgroup.com                                     |
|                           | <b>Phone:</b>   | 0330 024 7574  |
| <b>Equifax Limited</b>    | <b>Post:</b>    | Equifax Ltd, PO Box 10036, Leicester, LE3 4FS                              |
|                           | <b>Email:</b>   | complaints@equifax.com   |
|                           | <b>Phone:</b>   | 0333 321 4043 or 0800 014 2955   |
| <b>Experian Limited</b>   | <b>Post:</b>    | Experian, PO BOX 9000, Nottingham, NG80 7WF                                |
|                           | <b>Email:</b>   | complaints@uk.experian.com   |
|                           | <b>Phone:</b>   | 0344 481 0800 or 0800 013 8888   |

If you're unhappy with how the CRA has investigated your complaint, you have the right to refer it to the Financial Ombudsman Service (Ombudsman) for free. The Ombudsman is an independent public body that aims to resolve disputes between consumers and businesses like CRAs. You can contact them by:

1. Phone on 0300 123 9 123 (or from outside the UK on +44 20 7964 1000)
2. Email on [complaint.info@financial-ombudsman.org.uk](mailto:complaint.info@financial-ombudsman.org.uk)
3. Writing to Financial Ombudsman Service, Exchange Tower London E14 9SR
4. Going to their website at [www.financial-ombudsman.org.uk](http://www.financial-ombudsman.org.uk)

You can also refer your concerns to the Information Commissioner's Office (or ICO), the body that regulates the handling of personal data in the UK. You can contact them by:

1. Phone on 0303 123 1113
2. Writing to them at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF
3. Going to their website at [www.ico.org.uk](http://www.ico.org.uk)

### 14. WHERE CAN I FIND OUT MORE?

The work credit reference agencies do is very complex, and this document is intended to provide only a concise overview of the key points. More information about each CRA and what it does with personal data is available at the following locations:

- **Callcredit:**  
*<http://www.callcredit.co.uk/consumer-solutions>*
- **Equifax:**  
*<https://www.equifax.co.uk/index.html>*
- **Experian:**  
*<https://www.experian.co.uk/>*

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>*





Family Building Society is a trading name of National Counties Building Society which is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority and is a member of the Building Societies Association.

**Principal Office:** Ebbisham House, 30 Church Street, Epsom, Surrey KT17 4NL.

**Telephone:** 03330 141144

**Email:** [savings.service@familybsoc.co.uk](mailto:savings.service@familybsoc.co.uk)  
[mortgage.service@familybsoc.co.uk](mailto:mortgage.service@familybsoc.co.uk)



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**Principal Office:** Ebbisham House, 30 Church Street, Epsom, Surrey KT17 4NL.

**Telephone:** 03300 243411

**Email:** [savings.service@ncbs.co.uk](mailto:savings.service@ncbs.co.uk)



Counties Home Loan Management Limited (registered in England No. 2436601) is a subsidiary of National Counties Building Society.

The Company's registered office is 30 Church Street, Epsom, Surrey KT17 4NL. Authorised and regulated by the Financial Conduct Authority.