



Customer Privacy Notice

1. About us

This privacy notice explains how Swansea Building Society (**we** or **us**) of 11/12 Cradock Street, Swansea, SA1 3EW, collects, stores and uses your **personal information**. We are the data controller of your personal information, which means information that is about you or from which we can identify you. Please read this carefully to understand how we will use your personal information.

If you have any queries about this privacy notice or wish to exercise any of the rights mentioned in it, please contact our Data Protection Officer, either in writing at 11/12 Cradock Street, Swansea, SA1 3EW or via email at dpo@swansea-bs.co.uk.

2. Why do we need to collect your personal data?

We use personal information about you in the following ways:

- to confirm your identity when you open an account or contact us;
- to consider and assess your application for a service, an account or a role with us;
- to manage and administer your account(s) with us;
- to provide you with information that you ask us for and notify you about changes to our services;
- to provide you with information about other goods and services we offer that we think you may be interested in;
- to recover debts owed to us and to prevent financial crime;
- to improve our website to ensure that content is presented in the most effective manner for you and for your computer; and
- to keep our website safe and secure.

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

3. Do you have to provide your personal information to us?

If you do not provide us with the personal information we need, we may be unable to provide you with our products and services or to process your application. Your personal information is required before you can enter into a 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. We will tell you on our application forms what information is necessary and what is optional for you to provide.

4. Where do we collect your personal information from?

We will generally collect your personal information directly from you (for instance, when you complete an application form or contact us about your accounts).

We also obtain your personal information from other sources such as Credit Reference Agencies (CRAs), the Disclosure and Barring Service, your employer, landlord, other lenders, HMRC, DWP, publicly available directories and information (e.g. telephone directory, social media, internet, news articles), debt recovery and/or tracing agents, other organisations to assist in prevention and detection of crime, or police and law enforcement agencies.

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

If you have been introduced to us by a broker or other intermediary

Our products and services are available through our own branches 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.

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 them. You must show this privacy notice to the other applicant and ensure they understand that you will share it with us for the purposes described here.

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.

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.

5. What personal information do we collect?

The personal information we collect about you depends on the products or services you apply for and, if your application is successful, that we provide to you.

We collect the following information in connection with all of our products and services:

- 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
- Some special categories of personal data such as about your health or if you are a vulnerable customer.

If you apply for a mortgage, we may also collect:

- 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.

If you apply for a savings product, we may also collect:

- 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.

We may obtain personal data from third parties in order to trace individuals

We may also monitor your use of our website, including the collection of location and traffic data.

6. Keeping in contact with you

We may use your home address, phone numbers and email address to provide you with important information about your accounts. We will never ask you to reveal your password or personal information by email.

In addition, we may use your contact details to contact you to provide you with marketing information about our other products and services which may be of interest to you. Currently, we only do this by post. You will have the opportunity to opt out of receiving such marketing information when you first provide your details to us, and you can change your mind at any time by contacting our Data Protection Officer.

7. What are our legal grounds for collecting and using your personal data?

Data protection laws require us to explain our legal grounds for processing your personal information. We use the term **processing** to describe everything we do with your personal information from its collection, right through to its destruction or deletion. This includes sharing your data with other organisations.

The legal grounds that are relevant to us are:

- Processing which is necessary **to perform our contract with you or for taking steps prior to entering into it (during the application stage)**. We use this grounds for:
 - a) administering and managing your accounts, updating your records, tracing your whereabouts and doing this for recovering debt in the case of a mortgage product;
 - 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) managing your mortgage or savings account including enquiries, applications, administration and management of accounts, illustrations, requests for transfers of equity, and setting up/changing/removing guarantors in the case of a mortgage account; and
 - d) assessing applications for employment with us.
- Processing which is necessary **to comply with our legal obligations** as a regulated building society. We use this grounds for:
 - a) compliance with laws that apply to us;
 - b) establishment, defence and enforcement of our legal rights;
 - c) activities relating to the prevention, detection and investigation of crime;
 - d) assessing applications for employment with us;
 - e) to carry out identity checks, anti-money laundering checks pre-application, at the application stage, and periodically after that.
 - f) to carry out monitoring and to keep records (see below);
 - g) to deal with requests from you to exercise your rights under data protection laws;
 - h) 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
 - i) 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;
 - 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.
- Processing which is necessary **for our own legitimate interests** or those of other organisations (who we have listed at point (j), below), where these interests are not outweighed by any prejudice to your rights and freedoms. We use this grounds for:
 - a) administering and managing your accounts, updating your records, tracing your whereabouts and doing this for recovering debt in the case of a mortgage product;
 - 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;
- f) to carry out monitoring and to keep records (see below);
- g) to administer our good governance requirements such as internal reporting and compliance obligations or administration required for AGM processes; for example ascertaining eligibility to vote and provide voting information.
- h) for market research and analysis and developing statistics;
- i) for direct marketing communications; and
- 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);
 - Other payment services providers such as when you ask us to share information about your account with them;
 - Other account holders or individuals when we have to provide your information to them because some money paid to you by them should not be in your account;
 - The broker or other intermediary who introduced you to us;
 - Our legal and other professional advisers, auditors and actuaries;
 - Financial institutions and trade associations;
 - Other organisations and businesses who provide services to us such as debt recovery agencies, back up and server hosting providers, IT software and maintenance providers, document storage providers and suppliers of other back office functions;
 - Buyers and their professional representatives as part of any restructuring or sale of our business or assets;
 - Credit Reference Agencies (see below where we explain more about this); and
 - Market research organisations who help us to develop and improve our products and services.
- Processing with your **consent**. We use this grounds for:
 - a) when you request that we share your personal information with someone else and consent to that; and
 - b) some of our processing of special categories of personal information 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).
- Processing which is for a **substantial public interest** under laws that apply to us where this helps us to meet our broader social obligations. We use this grounds for:
 - a) processing of special categories of personal information such as about your health or if you are a vulnerable customer. You can obtain a leaflet about vulnerable customers if you contact our Data Protection Officer using the details above;
 - b) processing that we need to do to fulfil our legal obligations and regulatory requirements; and
 - c) when we share your personal information with other people and organisations if they need to know that you are a vulnerable customer and your relatives, social services, your carer, the person who has power of attorney over your affairs.

8. How and when can you withdraw your consent?

As we explain above, 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 withdraw your consent at any time. You can do this by contacting us using the details above.

The consequence of withdrawing your consent 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).

9. Who do we share your personal information with?

Depending on the circumstances, we may share your personal information with:

- our 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);

- Other payment services providers such as when you ask us to share information about your account with them;
- Other account holders or individuals when we have to provide your information to them because some money paid to you by them should not be in your account;
- The broker or other intermediary who introduced you to us;
- Our legal and other professional advisers, auditors and actuaries;
- Financial institutions and trade associations;
- Other organisations and businesses who provide services to us such as debt recovery agencies, back up and server hosting providers, IT software and maintenance providers, document storage providers and suppliers of other back office functions;
- Buyers and their professional representatives as part of any restructuring or sale of our business or assets;
- Credit Reference Agencies and the Disclosure and Barring Service;
- Market research organisations who help us to develop and improve our products and services;
- 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.
- We may share personal data with third parties for the purpose of tracing and verifying data.

10. Is your personal information transferred outside the European Economic Area?

We are based in the UK and your personal information is stored within the European Economic Area (EEA). We do not transfer your personal information outside the EEA other than in exceptional circumstances, where a problem is identified with your account that we cannot fix ourselves. We use a service provider based in the EEA to administer customer account records and, where such a problem arises, your personal information may be accessed by a subsidiary company of our service provider, which is based in India and provides IT support services. We have put in place measures to ensure that your personal information is protected if it is required to be accessed from outside the EEA. For more information about these measures, please contact our Data Protection Officer.

11. Credit reference agencies

In order to process your application, we will perform identity checks on you with one or more credit reference agencies (CRAs). To do this, we will supply your name and other identifying information to the 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 public information (including the electoral register). We will use this information to identify you, to verify the accuracy of the data you have provided to us and to prevent criminal activity, fraud and money laundering.

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 <https://www.equifax.co.uk/crain>.

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.

12. What should you do if your personal information changes?

You should tell us without delay so that we can update our records. The contact details for this purpose are: dpo@swansea-bs.co.uk. If you were introduced to us by a broker or other intermediary, 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.

13. 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 or in person meetings (as relevant) we will do so.

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

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

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

14. For how long is your personal information retained by us?

We will generally hold your information for the whole time that you have an account with us, and for a period of six years after your account is closed. In some circumstances we may keep your information for longer than this, for instance where we are required by law to do so, or where we need to retain your information to defend or exercise our legal rights. We may also retain transactional history for statistical research and reporting reasons.

Where the personal information is not related to an account (for instance if you have enquired about our services but have not opened an account) we will generally only keep your information for the time it takes to deal with your enquiry and for a period of 12 months.

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

15. Your rights

Under data protection laws, you have the rights listed below. If you wish to exercise any of these rights, please contact our Data Protection Officer. We will aim to respond within one month. There is no fee for making a request. Please note that not all of these rights will apply to all of your personal information.

- **The right to be informed** – we have to be transparent with you about the processing that we do with your personal information. This is why we have a privacy notice.
- The right to ask us to **correct your personal information if it is inaccurate** and to have **incomplete personal information completed**. If we have disclosed the personal information in question to other organisations, we must inform them of the correction where possible.
- The right **to object to our processing** of your personal information where it is based on our legitimate interests, where it is processed for direct marketing or where it is processed for the purposes of statistics. Your right to object may be relevant if you wish to find out more about what legitimate interests we rely on (they are listed in our privacy notice).
- The right **to restrict processing** of your personal information in certain circumstances.
- The right to ask us to **have your personal information erased**. This right is not absolute – it applies only in particular circumstances and, where it does not apply, we will tell you. We will not be able to comply if we are required to keep your personal information in order to comply with a legal obligation or to exercise or defend legal claims.
- The right to **request access to the personal information held about you**. This is often described as a Subject Access Request.
- The right to ask for your personal information in a reusable format (known as the **right to data portability**). This right only applies where personal information is being processed based on your consent or for performance of a contract and is carried out by automated means. This is separate to a Subject Access Request.

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

If you are unhappy with the way that we are handling your personal information, please contact our Data Protection Officer in the first instance and we will try to resolve your complaint. However, you do also have the right to complain to the Information Commissioner's Office, which is the regulator for data protection laws: <https://ico.org.uk/>

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