



**BEVERLEY**

BUILDING SOCIETY

Building Better Futures

# Privacy Notice

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## **Introduction**

This privacy notice sets out how Beverley Building Society will collect and use your personal data and your information rights. Any references to 'us', 'our' and 'we' means Beverley Building Society.

We are committed to taking good care your personal data and ensuring the highest standards of privacy. If you have any questions about this notice, please get in touch with our Data Protection Officer via [DPO@beverleybs.co.uk](mailto:DPO@beverleybs.co.uk)

This privacy notice may be updated from time to time, please check our website for the latest version.

## **Data Controller**

An organisation that decides how the personal data it collects, and holds is used is called a 'data controller'. This use of personal data is called 'processing' – this includes the collection, storage, analysis, sharing, retention, and disposal of personal data. If you're a member of Beverley Building Society, the data controller of your personal data is Beverley Society. As a Data Controller, we are registered with the Information Commissioner's Office (ICO) - the organisation in the UK that oversees that an organisation is acting accordingly when processing personal data. Our registration numbers is:

**Z6477839**

## **Why do we need your personal data?**

In order that we can provide you with a high-quality service, deal with your queries, make an assessment on the suitability of our products or services and to enter into a relationship with you, we will need to obtain and use personal data. If we already hold some of your personal data, for example, if you are already a member, we may not need to collect it again and in such cases, we will make this clear.

You are under no statutory or contractual obligation to provide any personal data to us. However, if you do not provide the information, we may not be able to provide you with our products or services or deal with your queries. We will be also be unable communicate with you effectively.

## **What personal data do we collect?**

We collect and use a variety of personal data to run our business and manage our relationship with you. The table below shows the typical categories of personal data we ask you for when you open a saving account take out a mortgage with us with and why we may ask for it.

| DATA WE COLLECT   | HOW WE USE IT  |
|---|--|
| <b>GENERAL PERSONAL DATA</b>  |  |
| Name, title, sex, address   | <p>We use this to identify you and:<br/>To open and manage your mortgage and/or savings accounts with us.</p> <ul style="list-style-type: none"> <li>• To provide products and services of our partners.</li> <li>• To provide you with support and for debt recovery purposes.</li> <li>• To enhance your experience and our products and services.</li> <li>• To share relevant marketing about our products and services.</li> <li>• To meet our legal and regulatory obligations.</li> <li>• Inform you of any meetings such as the Annual General Meeting (AGM) and facilitate voting.</li> </ul>         |
| Date of birth and/or age  | <p>We use this to identify you and:</p> <ul style="list-style-type: none"> <li>• To open and manage your accounts and relationship with us.</li> <li>• To confirm your age.</li> <li>• To meet our legal and regulatory obligations.</li> </ul>  |
| Nationality   | <ul style="list-style-type: none"> <li>• To meet our legal and regulatory obligations.</li> <li>• To open and manage your accounts and relationship with us.</li> </ul>  |
| Occupation  | <p>We ask you for your profession or occupation, whether you are employed, self-employed or retired. This helps us determine the eligibility for some products and services and ensures you get the right information when you contact us.</p>   |
| National insurance number, passport, driving licence and other national identifiers | <p>We use this to verify your identity when you apply for a product with us and to meet our requirements with Her Majesty's Revenue and Customs (HMRC) for tax reporting regulations.</p>  |
| Email address and phone number  | <p>We use your email address and phone number to:</p> <ul style="list-style-type: none"> <li>• Enable you to register for an online business account</li> <li>• Contact you about your account(s).</li> <li>• Send you marketing information (where you have consented).</li> <li>• Enable you to register your interests for new product or service updates that we may offer. Enable you to register to receive updates about our community activities or other events we are involved in.</li> <li>• Run and administer competitions/prize draws which you have entered and to notify the winner</li> </ul> |
| Tax status  | <p>Where applicable, we will use this for identifying your tax status.</p>   |

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| Call recordings   | It is important that we provide the best possible service to you. This might mean that we log and record calls you make to us to resolve any discrepancies or issues. We may also record calls for training and monitoring purposes, including meeting our legal obligations   |
| Direct marketing preferences                              | We ask you if you wish to receive notifications from us about our products and services that may be of interest to you. We will only do this where we have your explicit consent and will only contact you by methods you have chosen (e.g. phone, or email)   |
| <b>MORTGAGES</b>  |  |
| Employment status   | We ask you for your profession or occupation, whether you are employed, self-employed or perhaps retired. This helps us determine the eligibility for some products and services and ensures you get the right information when you contact us or visit us in Branch.  |
| Earnings, income and expenditure and spending habit       | When you apply for a mortgage with us, we use this to determine your earnings so that any lending or access to credit is appropriate and affordable to you. We ask you about your other sources of income including pension payments or benefits you may receive. We use this to assess how you manage account payments and credit. We will use this information where to enable us to provide support as part of our collections process.   |
| County Court Judgments (CCJ) and insolvency data          | We collect information in relation to any insolvency proceedings about you, including CCJs in order to inform our lending decision making and provide you with appropriate advice and support.   |
| Residential status, property details and occupancy status | When you apply for a mortgage with us, we use this information to understand the current and previous properties you have lived at, other properties you own, whether you are an owner, tenant or living with parents. This helps us to provide you with appropriate advice and to inform our lending decisions.   |
| Transaction history and source of funds                   | We need to ask you the source of your income or perhaps an amount of cash that you wish to put down as a deposit or paying into (or withdrawing) from an account. This will also help us to detect fraudulent activity on your account and comply with our regulatory requirements.  |
| Criminal convictions (spent or unspent) and offences      | We will only use information relating to criminal convictions or alleged criminal behaviour where the law allows us to do so. This can arise when it is necessary for us to comply with the law or for another reason where there is a substantial public interest in us doing so. Less commonly, we will, if necessary, use information relating to criminal convictions or alleged criminal behaviour where it is necessary in relation to legal claims, where it is necessary to protect your interests (or |

|  |   |
|--|---|
|  | someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.  |
| <b>CHILD SAVINGS ACCOUNTS</b>                        |   |
| Controller information                               | Where a child account is operated by a controller, we will obtain personal data relating to the controller to manage our relationship with the controller and to manage the account(s). |
| Birth certificate, passport, or other identification | When an account is opened by or for a child, we will ask for identification to confirm the child's identity   |

## Special Category Data

Occasionally we may need to ask for personal data that might seem sensitive. This is known as 'special category data'. For example, a question about your health, vulnerabilities or whether you have any previous criminal convictions. In general, we do not collect special category data about you, but sometimes the personal data we collect may reveal this.

This will, however, be limited to the minimum required. This can include personal data relating to your: health, including any medical condition, health and sickness, criminal convictions and offences.

## The Source of your personal information

The Beverley Building Society obtain your personal data from the following sources:

|  |
|--|
| <b>DIRECTLY FROM YOU</b>   |
| <p>We will obtain personal data directly from you:</p> <ul style="list-style-type: none"> <li>• When you apply for our products or services online or on the phone.</li> <li>• When update your information online, in branch or over the phone (such as when you change your address).</li> <li>• When you visit us in branch.</li> <li>• When you speak to us on the phone (we may record some calls for training and quality purposes). When using our websites, online web chat services and any digital or mobile app we may offer now or in the future</li> <li>• When you send us in letters, emails or other documents.</li> <li>• When we use information that you've made public, such as social media content or when you interact with our social media profiles.</li> <li>• When you apply for a job with us (see our Applicant Privacy Notice).</li> </ul> |
| <b>THIRD PARTIES ACTING ON YOUR BEHALF</b>   |
| <p>We may obtain personal data relating to you from third parties as part of the application process for one of our products or services. This can include individuals who are:</p> <ul style="list-style-type: none"> <li>• a joint applicant on an account you hold or are applying for</li> <li>• a controller on an account</li> <li>• a parent</li> <li>• a guardian</li> </ul>   |

- a nominated representative
- acting under a Power of Attorney or similar authority
- a mortgage broker or mortgage intermediary who is acting on your behalf. If someone acting on your behalf provides this information, we'll record what's been provided and who gave it to us. In the event that you're providing personal data about another individual, we'll assume that you have told them that you are sharing their details and where they can find more information on how we may process their personal data.

#### **OTHER THIRD PARTIES**

As part of our relationship with you, we collect or receive personal data relating to you from certain third parties in order to facilitate our decision making including:

- Current and former employers.
- Referees.
- Housing Associations.
- Royal Mail (UK postal addresses).
- Local Authorities (electoral roll).
- The Insolvency Service.
- Companies' House.
- Housing associations and landlords
- Court and tribunal Service
- Credit reference agencies.
- Government bodies and agencies.
- HM Revenue and Customs and other tax authorities.
- Regulators, such as ICO, FCA and PRA.
- Law enforcement agencies.
- Fraud prevention agencies.
- Insurers.
- Financial advisers.
- Land agents.
- Card associations.
- Retailers.
- Comparison websites.
- Market research providers.
- Tracing and debt recovery agents.
- Organisations providing data services to support us in managing our relationship with you and operating our business.

### **Collecting Special Category Data**

In almost all cases, we'll ask for your explicit consent before collecting special category data unless we are required to by law, there is an overriding public interest, or where we believe you or someone else may be at risk

If you contact us containing this type of information, then we'll assume that you're happy for us to record it – unless you tell us not to. If someone acting on your behalf provides this information, we'll record what's been provided and who gave it to us. You have the right to

withdraw your consent to us recording and using special category data at any time. This will not affect any use we have made of the information before you withdrew your consent.

**Personal data relating to children**

We offer savings accounts for children which they can open themselves. The age at which they can do this will depend on the type of account. Any account opened for a child under age 8 can only be held in trust. If a child opens an account themselves, we will obtain personal data and identification from them (or from their parent/guardian on their behalf). If a child opens an account when they are 16, we will verify their identity electronically, but if this is not possible, we will ask for identification, such as a passport or birth certificate from them. If an account is opened on the child’s behalf, for example by a parent or family member, we will obtain identification for the child, such as a passport or birth certificate, from the person opening the account in order to verify the child’s identity. If they are not the child’s parent or guardian, we may ask for confirmation they have permission to open an account for the child.

**Have you been introduced to us by a Third Party?**

When a third party 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 third party 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.

**Lawful basis for processing personal data**

We process your personal data for a number of different purposes. When we collect, use, share or hold your personal data, we must have a valid reason to do so (known as a ‘lawful basis’). The table below sets out the different lawful basis we may rely on. You can find out more in the ‘how we use your personal data section’.

| LAWFUL BASIS     | DESCRIPTION  |
|------------------|--|
| Consent          | You have given free and clear consent for us to process your personal data for a specific purpose.   |
| Contract         | The processing is necessary for a contract we have with you, or because we have asked you to take specific steps before entering into a contract |
| Explicit consent | You have given explicit consent for us to process your sensitive personal data (special category) for a specific purpose.                        |
| Legal obligation | The processing is necessary for us to comply with the law or legal requirement.  |

|                      |  |
|----------------------|--|
| Legitimate interests | The processing is necessary for our legitimate interests or the legitimate interests of a third party, unless there is a good reason to protect your personal data which overrides those legitimate interests. |
|----------------------|--|

## Lawful basis for processing Special category data

We will only process your special category personal data where we have an additional lawful basis. This includes:

- Where we need to carry out our legal obligations or exercise rights in connection your application for an account with us.
- With your explicit written consent. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent.
- Where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else’s interests) and you are not capable of giving your consent, or where you have already made the information public.

In very specific circumstances the law allows us to process health data under the ‘Public Interest’ basis without consent in order to ensure the economic well-being of the customer, for example where a customer cannot protect their economic well-being due to their physical or mental injury, illness or disability.

## How do we use your personal data?

We use your personal data stated above for a whole host of reasons. This includes:

| PURPOSE<br>(LAWFUL BASIS WE RELY ON TO<br>PROCESS YOUR PERSONAL DATA)                                 | WHY WE USE YOUR DATA   |
|---|--|
| Managing your enquiry, application and ongoing account management<br>(Contract, Legitimate Interests) | We will collect, use, share and keep personal data needed for us to deal with your enquiries, process your applications, provide any illustrations you require, and manage the ongoing administration of your accounts, products and services. This includes keeping your account records up to date and contacting you when needed.   |
| Processing a Decision in Principle<br>(Contract)  | We will collect, use, share and keep personal data to provide you with a Decision in Principle and to assess, review and process your application. This process involves reviewing your application with the use of financial models and automated systems provided by Credit Reference Agencies and against our lending criteria. This will help us to understand your mortgage application and to assess the affordability of the products and services you apply for.   |
| Making checks regarding your financial status<br>(Contract)   | <p>Sometimes, we'll need to share your personal data with a credit reference Agency (CRA) to check that a product or service is right for you or to verify your identity as part of an application for a job or role with us. We do this to:</p> <ul style="list-style-type: none"> <li>• Assess your creditworthiness, and consider whether we believe you can afford to take Contract</li> <li>• Confirm your income and outgoings.</li> <li>• Check the information you've provided to us is accurate.</li> <li>• Prevent criminal activity and financial crime including fraud and money laundering.</li> <li>• Manage your ongoing relationship with us.</li> <li>• Trace and recover debts.</li> <li>• Make sure any offers we propose are appropriate (when we have the right to do so).</li> </ul> <p>When we ask a credit reference Agency to do a search on our behalf, this may leave a search footprint on your credit file that may be seen by other lenders. This happens whether or not you, or us choose to proceed with the application.</p> <p>If you're making a joint application, your credit records will be linked together. This creates what's known as a 'financial association' at credit reference agencies. So, you should always discuss and agree this with other applicants before disclosing their information to check that they're happy to proceed.</p> <p>Information about any financial associations will be shared with other lenders if either of you make a credit application in the future –</p> |

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|  | <p>whether it's in just your name or together with someone else. There are three key credit reference agencies that we use. Please refer to the Credit Reference Agency Information Notice (CRAIN) on our website to find out more about them, the data they hold (and for how long), the way they use and share your information, how they prevent fraud and your data protection rights.</p>   |
| <p>Communicating with you via our various channels<br/>(Contract, legitimate interests)</p>            | <p>We will use your personal data to communicate with you. This includes via the telephone, email and social media.</p>  |
| <p>Preventing and detecting fraud and financial crime<br/>(Legal obligation, legitimate interests)</p> | <p>We use and share your personal data with fraud prevention agencies to help prevent financial crime. If required for fraud or criminal investigation reasons, we (and the fraud prevention agencies) may also allow law enforcement agencies to access and use your personal data.</p> <p>We have a legal obligation and legitimate interest to check people's identity and prevent financial crime including fraud and money laundering. Sharing your personal data in this way, when necessary, allows us to protect your financial security as well as that of our other members and customers. It also makes sure that we're complying with the law.</p> <p>If we, or a fraud prevention agency, determine that you pose a fraud or money laundering risk, we may refuse to provide the services and financing you have requested, or to employ you, or we may stop providing existing services to you. A record of any fraud or money laundering risk will be retained by the fraud prevention agencies, and may result in others refusing to provide services, financing or employment to you. If you have any questions about this, please contact us on the details below.</p> |
| <p>Verifying your identify<br/>(Contract, Legal obligation legitimate Interests)</p>                   | <p>We have a regulatory requirement to confirm the identity of anyone opening an account with us or when they apply for a job or role with us. This upholds our legal obligation to complete necessary due diligence checks to make sure we know our customers and potential employees, helps prevent and detect fraud, prevents identity theft and protects our business. You have the right to object to us using your personal data for legitimate interests.</p>   |
| <p>Meeting our legal and regulatory obligations (Legal Obligation)</p>                                 | <p>We're required to collect and use your personal data in several circumstances to meet our legal and regulatory obligations. These include using your personal data to carry out a range of activities that ensure we comply with the requirements set out by our regulators (e.g. Financial Conduct Authority – FCA – and Prudential Regulation Authority – PRA) and in relevant legislation (e.g. Data Protection Legislation and Anti Money Laundering Regulations). We also disclose information to HMRC and other government bodies when we are required or permitted to do so.</p>   |

|   |  |
|---|--|
| CCTV<br>(Legitimate Interests)  | CCTV is used in branch for the safety and security of our customers and Employees. This may capture personal data such as your image, likeness, and voice. Footage may be reviewed by Society staff or passed to the police or law enforcement agencies upon request following a safety/security incident.   |
| Debt recovery purposes<br>(Legitimate interests)                                  | <p>We collect and use your personal data to:</p> <ul style="list-style-type: none"> <li>• Assess the likelihood that your circumstances have changed.</li> <li>• Work with you through challenging times, by understanding and supporting your needs.</li> <li>• Recover any outstanding money owed to us (this could include trying to locate you).</li> <li>• Help us decide on any further action we may need to take in order to recover money owed (e.g. whether we need to consider legal action or using a debt recovery agent).</li> </ul> <p>We'll process your personal data in this way when it's necessary to meet the terms and conditions of your product or service, and also when you ask us to carry out activities that need your authorisation (e.g. when you've requested for someone to act on your behalf or if you choose to give us information about your health or any criminal convictions).</p>  |
| Competitions and prize draws<br>(Legitimate interests)                            | We use personal data to manage and run competitions/prize draws for customers, members and the wider public. When we collect personal data for this reason, we use it to administer the competition/draw and notify the winner.  |
| Enhancing your experience and our products and services<br>(Legitimate Interests) | <p>We collect and use your personal data to help us make our business better, improve products and services and enhance how we engage with members.</p> <p>We use your personal data in this way when it is in our legitimate business interests. Your information and views help us understand the changing needs of our members and customers. We look at you and how you engage with us (e.g. how long you've been a member), your transactions and how you use our products and services (e.g. the types of accounts you have and how you use our services).</p> <p>Sometimes, we'll collect personal data you from organisations carrying out market research on our behalf to make sure you had a positive experience in our branch or when you've telephoned us, or to ask your opinion on our products and services, or trends in our industry. Then, we structure and analyse this information to consider how you might use our products and services in the future. We may also use your information to categorise groups of members who interact and engage with us in similar ways.</p> |
| Profiling<br>(Legitimate interests)   | There may be some circumstances where we use your personal data for profiling. Profiling is used to make automated decisions. This is  |

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|  | <p>where we combine your personal data with information about others so that we can:</p> <ul style="list-style-type: none"> <li>• Understand trends, traits and behaviours.</li> <li>• Make predictions about how you might use our products and services in the future.</li> <li>• Analyse data to improve our service and generate alerts (e.g. where we suspect that you may be the victim of financial crime).</li> </ul> <p>Profiling your personal data alongside other members and customers also helps us to ensure that we're providing a consistent service and giving people the best products and advice at the right times. We'll always make sure the way we process your information is safe and not unfair to you. Where possible, we'll keep your details anonymous and use your information only to produce statistical reports. This way, you will not be identifiable from the data. You have the right to object to us using your personal data for legitimate interests.</p> |
| Social media<br>(Legitimate interests)                       | <p>We want you to get the most out of your relationship with us so we use social media and websites to let you know about the products and services we offer that might be of interest to you and to communicate with you if you contact us through this method. We may also use social media services to enhance our services, presence and your customer experience. Your comments, opinions and messages may be used so that we can better understand our customers and improve our products, services and overall customer offering.</p> <p>If you want to control the adverts you see on social media platforms, you can manage your marketing preferences (including receiving targeted marketing ad) through their settings and privacy pages. You may still see adverts, but these won't be tailored to you</p>  |
| Statistical analysis and reporting<br>(Legitimate Interests) | <p>We use personal data in order to carry out Data Analysis, Trends and Statistical Reporting. We will only do this using personal data where necessary and if we are unable to use anonymous data.</p>  |
| Surveys and feedback<br>(Legitimate Interests)               | <p>We use personal data to manage surveys we may conduct from time to time. As part of this we may engage third party providers to administer the survey on our behalf and share your contact details with them. See: Enhancing your experience and our products and services You have the right to object to us processing your personal data in this way</p>   |
| Testing our systems and processes<br>(Legitimate interests)  | <p>In order to improve our services and systems, we may use your personal data for testing our systems so that we can make them even better. Using your personal data for testing is necessary for our legitimate business Legitimate interests</p> <p>We have stringent processes in place to keep your personal data safe and we won't use it in a way that's unfair to you. When we are unable to use 'masked' or anonymous data (i.e. that which doesn't identify you), we will aim to:</p>  |

|   |  |
|---|--|
|   | <ul style="list-style-type: none"> <li>• Always do this in a secure and controlled environment.</li> <li>• Only use the minimum amount of data necessary for the testing required.</li> <li>• Only use carefully selected specialist service providers, where necessary.</li> <li>• Only hold your information in this way for as long as needed to carry out testing.</li> </ul>  |
| Marketing our products and services (Consent)                   | <p>We understand that you may wish to hear from us from time to time about our products or services that we think you'll find interesting or to keep up to date with the latest developments and news. If you have consented to receiving such communications, we may use the contact details you've supplied us to send you marketing information.</p> <p>You can change your mind at any time and can change your marketing preferences. We'll never pass on your details to anyone else for their marketing purposes.</p> |
| Informing you of our community events and initiatives (Consent) | <p>We will use your personal data to enable you to register to receive updates about our community activities or other events we are involved in.</p>  |

## How we use special category data

We'll only ask for this type of personal data when we absolutely need to and use it for limited circumstances to understand and accommodate any additional needs or requirements that you might have. For example, to help with any issues around your health, memory, caring responsibilities or any challenges you're facing in life.

## Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal data without your knowledge or consent, in compliance where this is required or permitted by law

## Automated decision making

There may be circumstances where we use automated decision making using your personal data. We use automated decision making to check that we can enter into an agreement with you, and also carry out our legal and regulatory obligations. Sometimes, it's required by law (e.g. when complying with UK money laundering regulations). When you request a Decision in Principle and/or apply for a mortgage with us, you will be taking the steps necessary to enter

into a contract with us. This process involves reviewing your application with the use of financial models, automated systems provided by Credit Reference Agencies (CRAs) and against our full lending criteria. This is to help us better understand your mortgage application and to assess the affordability of the products and services you apply for. When we do this the CRAs will keep a record of our search, whether or not you proceed with a full mortgage application. This is known as a credit footprint. They do this so that you can see who has looked at your credit report, when it was looked at and why. This record may also be seen by other lenders and could affect your ability to obtain future credit. We will use automated decision making to:

- To assess your application and check if we can approve you for credit, to make sure that we're lending responsibly.
- To assess if we can offer you a financial product and work out the level of interest that you'll pay.
- To check if someone's making a fraudulent application or if there's activity on your account that needs further review. This is so we can protect your money and protect you from financial crime.
- To decide if you are, or continue to be, eligible for the product or service you've chosen.

### **The information we use to make these decisions**

For automated decision making, we use information that we've collected or hold about you from your applications. Sometimes, we might also use information from other sources such as credit reference or fraud prevention agencies – but we check this against the information you give us.

## Who has access to your personal data?

There may be occasions where we need to share your personal data with external partners or organisations. The table below provides details on who we share personal data with and the reasons why:

| WHO  | PURPOSE   |
|--|---|
| Adult occupiers (for mortgages)                            | <ul style="list-style-type: none"> <li>To contact them to inform them of your mortgage or additional borrowing application applications and ask them to confirm that they have no claim on the property.</li> </ul>                           |
| Claims Management Companies                                | <ul style="list-style-type: none"> <li>To assist with enquiries and the assessment of claims</li> </ul>   |
| Courts and tribunals                                       | <ul style="list-style-type: none"> <li>To respond to court and tribunal requests</li> <li>To manage and resolve complaints, disputes and/or legal claims.</li> </ul>  |
| Credit reference agencies (CRAs)                           | <ul style="list-style-type: none"> <li>To verify your identity and to help trace your whereabouts if we have been unable to contact you.</li> <li>To review and assess your suitability, and application for products and services</li> </ul> |
| Data processors  | <ul style="list-style-type: none"> <li>To carry out processing activities on our behalf under contract and after we have assessed their suitability.</li> </ul>   |
| Debt recovery agencies                                     | <ul style="list-style-type: none"> <li>To assist with debt collection activities and to locate you if we have been unable to contact you via our usual communication channels.</li> </ul>   |
| Direct marketing providers                                 | <ul style="list-style-type: none"> <li>To provide marketing services on our behalf.</li> <li>To provide you targeted adverts based on your previous web browsing history.</li> </ul>  |
| Employers (past and present)                               | <ul style="list-style-type: none"> <li>To confirm your employment and employment status and income received.</li> </ul>   |
| Financial advisers   | <ul style="list-style-type: none"> <li>To provide you with financial advice and assistance.</li> </ul>  |
| Fraud prevention agencies (e.g. CIFAS and National Hunter) | <ul style="list-style-type: none"> <li>To carry out checks for the purposes of preventing fraud and money laundering</li> <li>To verify your identity.</li> <li>To assess your suitability for products and services.</li> </ul>              |

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|   | <ul style="list-style-type: none"> <li>• For fraud prevention and tracing activity.</li> </ul>  |
| HM Revenue and Customs (HMRC) and other tax authorities   | <ul style="list-style-type: none"> <li>• To confirm your tax status and provide information for tax reporting purposes.</li> <li>• To assist with enquiries, investigations, complaints and assessments.</li> <li>• To assist with financial crime and fraud prevention.</li> </ul>   |
| Joint account holders, including former, current and/or future account holders and trustees (where authorised to operate the account) | <ul style="list-style-type: none"> <li>• To respond to enquiries, requests and further applications.</li> <li>• To allow ongoing administration of your joint account, products and services</li> <li>• To processing transactions.</li> </ul>  |
| Law enforcement agencies  | <ul style="list-style-type: none"> <li>• To assist with any ongoing investigations relating to the security and/or safety of individuals.</li> <li>• For financial crime and fraud prevention purposes.</li> </ul>  |
| Market research providers   | <ul style="list-style-type: none"> <li>• To provide market research services on our behalf.</li> <li>• To gain better understand our customers and members including their experiences, circumstances, needs and responses to our current and potential products, services and wider initiatives.</li> <li>• To gain a range of insights, for example market trends; consumer behaviour; competitors; technological change</li> <li>• To support a wide range of business decision making such as product development.</li> <li>• For data for profiling and customer segmentation to create a broad understanding of our customers, to help shape our communications, products and the overall customer experience from what our branches look like, to how we handle phone calls and other customer contacts</li> </ul> |
| Mortgage Guarantors or potential guarantors and their legal representatives   | <ul style="list-style-type: none"> <li>• To deal with their enquiries, requests and further applications.</li> <li>• To manage the ongoing administration of your accounts, products and services.</li> <li>• To process transactions.</li> </ul>   |
| Other financial institutions  | <ul style="list-style-type: none"> <li>• To review and assess your suitability and application for products and services.</li> </ul>  |

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|   | <ul style="list-style-type: none"> <li>• To manage payments (including the use of payment services involving the transfer of electronic payments into or out of your account).</li> <li>• To respond to requests for the postponement of a charge on your property. For financial crime and fraud prevention purposes.</li> <li>• To assist with enquiries and investigations.</li> </ul> |
| Regulators e.g. Financial Conduct Authority (FCA), Prudential Regulation Authority (PRA), Information Commissioner's Office (ICO) | <ul style="list-style-type: none"> <li>• To comply with our regulatory requirements and to resolve complaints.</li> </ul>   |
| Social Media providers  | <ul style="list-style-type: none"> <li>• To communicate with you and answer your queries submitted via social media.</li> <li>• To show you targeted advertising.</li> </ul>  |
| Solicitors, licensed conveyancers, valuers, panel managers and other professional advisers  | <ul style="list-style-type: none"> <li>• To provide professional services.</li> <li>• To review and assess your suitability and application for products and services.</li> <li>• To manage your ongoing relationships.</li> <li>• To administer and manage disputes and/or legal claims.</li> </ul>  |
| UK Financial Services Compensation Scheme<br>Financial Ombudsman Scheme   | <ul style="list-style-type: none"> <li>• To provide our regulatory and governing bodies with data about our business.</li> <li>• To assist with enquiries, investigations, complaints and assessments.</li> </ul>   |

## Transfers of personal data outside the EEA

There may be some circumstances where we may transfer your personal data to countries outside the UK when:

- We're required or permitted to by law or regulatory requirements.
- We're sharing data with a third party to support us in the management of your account

When working with our suppliers and/or transferring personal data to countries outside the UK, we take appropriate steps to ensure that there is adequate protection and controls are in place and that data protection legislation is followed. This could be by:

- Ensuring that we transfer personal data to countries that we believe have comparable data protection legislation to the UK.
- Putting suitable clauses in our contracts to ensure that organisations take appropriate steps to comply with UK data protection laws or the equivalent. If you would like more information on this, please contact us

## How we protect your personal data

We have appropriate security measures to prevent personal data from being accidentally lost, or used or accessed unlawfully. We limit access to your personal data to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality. We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

## How long do we keep your personal data?

Our aim is to keep your personal data only for as long as we need to, in order to manage your relationship with us and comply with legal and regulatory requirements. When determining retention periods, we consider the following:

- The maximum or minimum retention periods identified by the law or regulatory guidance
- Our contractual rights and obligations
- Customer expectations, the nature of your relationship with us, your membership status and the types of accounts, products and services you have with us
- Current or future operational requirements
- Forensic requirements, for example, the potential need to access data no longer actively used in order to manage or respond to complaints and disputes
- The risks involved in retention, deletion and removal
- The cost of maintaining, storing, archiving and retrieving data
- The capability or restraints of our systems and technology.

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

- Retention in case of queries: We will retain the personal information that we need to keep in case of queries from you for 1 year after you cease to be employed by us unless we have to keep it for a longer period (see directly below);
- Retention in case of claims: We will retain the personal information that we need to keep for the period in which you might legally bring claims against us which in practice means 6 years unless we have to keep it for a longer period (see directly below); and
- Retention in accordance with legal and regulatory requirements: We will retain the personal information that we need to keep even after the relevant contract you have with us has come to an end for 6 years and this will be to satisfy our legal and regulatory requirements (for example, to allow us to provide 'regulatory references' under the senior managers' accountability regime).

If you would like further information about our data retention practices, contact our Data Protection Officer at our address or via [DPO@beverleybs.co.uk](mailto:DPO@beverleybs.co.uk).

## Changes to your personal data

You should tell us without delay so that we can update our records. You can do this by writing to us at our address or visiting our branch. If you were introduced to us by a third party who is data controller in its own right, you should contact them separately. In some cases where you exercise rights against us under data protection laws (see below) we may need to inform the broker or other intermediary but this will not always be the case.

What rights do you have in relation to your personal data?

| RIGHT  | DESCRIPTION   |
|--|---|
| <b>Request to be informed</b> about how we process your personal data.                           | You have the right to be informed about the collection and use of your personal data.   |
| <b>Request access</b> to your personal data (commonly known as a “data subject access request”). | This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.  |
| <b>Request rectification/correction</b> of the personal data that we hold about you.             | This enables you to have any incomplete or inaccurate data corrected.   |
| <b>Request erasure</b> of your personal data.  | This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object.   |
| <b>Object to processing</b> of your personal data.   | You can object to us using your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal data for direct marketing purposes. |
| <b>Request the restriction of processing</b> of your personal data.                              | This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.  |
| <b>Request the transfer</b> of your personal data to another party                               | In certain circumstances, you have the right to ask us to transfer a copy of some of your personal data to you or to a new data controller (e.g. another financial provider or comparison website).   |
| <b>Right to withdraw your consent</b>  | Where we rely on your consent to process any of your personal data, you have a right to withdraw that consent at any time. This will not affect any use we have made of the information before you withdrew your consent.   |
| <b>Object to automated decision making /Profiling</b>  | In certain circumstances, you have the right to ask for an automated decision (such as a  |

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|                                  | lending decision made by a machine) to be reviewed by a human.  |
| <b>Complain to the Regulator</b> | You have the right to make a complaint to the Supervisory Authority. In the UK, this is the Information Commissioner's Office (ICO). You can find out how to contact the ICO below. |

To request to exercise any of these rights you can:

- Email our Data Protection Officer via [DPO@beverleybs.co.uk](mailto:DPO@beverleybs.co.uk)
- Write to us or visit us in branch at:  
Beverley Building Society,  
57 Market Place,  
Beverley,  
East Yorkshire,  
HU17 8AA
- Call us on 01482 881510

## Accuracy of your personal data

Whilst we make every effort to ensure your data is correct, we kindly request that you help us by reporting any inaccuracies or discrepancies at the earliest opportunity. It your responsibility to keep us informed of any change of your circumstances including any name changes, alternative contact details or change of address. If you were introduced to us by a broker or other intermediary who is a data controller in their own right, you should contact them separately.

## Cookies

In order to improve your online experience with us, we use cookies. To find out more about cookies, the types of cookies we use, how we use them and how to manage your preferences, please see our cookies policy at <https://beverleybs.co.uk/cookies-policy>

## Data Protection Officer (DPO) details

If you have any concerns about how we collect, use, share or keep your personal data, you think there has been a breach, or you have a question or concern about anything in this notice, you may contact our Data Protection Officer (DPO) using the details below:

Data Protection Officer  
Beverley Building Society,  
57 Market Place,  
Beverley,

East Yorkshire,  
HU17 8AA

[DPO@beverleybs.co.uk](mailto:DPO@beverleybs.co.uk)

## **Contacting the Information Commissioner's Office (ICO)**

You have a right to complain to the Information Commissioner's Office (ICO) if you have any concerns about how we collect, use, share or keep your personal data. You may contact them at:

Information Commissioner's Office (ICO)  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Telephone: 0303 123 1113

Web: [ico.org.uk](http://ico.org.uk)

## **Updating this notice**

We regularly review and, where necessary, update our privacy information contained within this notice. This was last updated on 26.09.2022