

Privacy Notice

Your Personal Data – Business Relationships

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

- **Personal Data** is any information relating to you (the 'data subject') that is either about you or can be used to identify you. Some examples of this include your name, address, and contact information.
- **Data Controller** and **Data Processor** are terms used to describe companies or services that may use your data. A Data Controller will be responsible for deciding what processing happens with the data. A Data Processor will not make any decisions about the data, but will process data on instructions given to it by a Data Controller. Bath Building Society will act as both a Data Controller and Processor for your data. We may also share your data with third parties who act as Processors or Controllers, depending on the service they provide.
- **Process** or **processing** means anything that we do with your personal data, from when we first collect it, right through to when we destroy or delete it when we no longer need it. This can include collecting it (from you or other organisations), using, sharing, storing, retaining, deleting, destroying, transferring it overseas.
- **Legitimate interests** are mentioned in our privacy notice because data protection laws allow us to process personal data where the purpose is legitimate and is not outweighed by your interests, fundamental rights and freedoms. "Legitimate interests" is one of several lawful bases for personal data processing as described in data protection law. These will be covered in more detail below.

Who we are and how to contact us

Bath Building Society of 15 Queen Square, Bath BA1 2HN is a data controller of your personal data. This document (known as a Privacy Notice) describes how we deal with your personal data. 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, as explained in this document. When we use terms such as **we**, **us** and **our**, we mean Bath Building Society.

Our Head of Compliance and Data Protection Officer can be contacted if you have queries about this privacy notice or want to exercise any of the rights mentioned in it.

You can email us at:	dataprotection@bibs.co.uk
Or write to:	Data Protection Officer Bath Building Society 15 Queen Square Bath BA1 2HN

You will see at the end of this privacy notice that we mention the privacy notices of parties we share information with, such as Fraud Prevention Agencies, Money Laundering Prevention Agencies and Credit Reference Agencies. Please ask if you would like us to provide you with a copy.

This privacy notice may be updated from time to time. We will send you an updated copy upon request, or if we are required to do so.

What kinds of personal data about you do we process?

Given your business relationship with the Society, we collect only limited personal information about you, including the following:

- Your title, full name, your contact details, including for instance your email address, work and mobile telephone numbers;
- Your work address, correspondence address (if different)

Where do we get your personal data from?

We will generally collect personal data from you directly, although in some circumstances, depending on our business relationship, we may obtain information from Credit Reference Agencies or Financial Crime Prevention Agencies.

What are the lawful bases for processing personal data (including when we share it with others)?

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

Performance of contract	Processing necessary to perform our contract with you or for taking steps prior to entering into it.
Legitimate interests	<p>Where we consider that it is appropriate, processing necessary for the following legitimate interests which apply to us (and in some cases other organisations) are:</p> <ul style="list-style-type: none"> • To test the performance of our products, services and internal processes. • To adhere to guidance and best practice under the regimes of governmental and regulatory bodies such as: <ul style="list-style-type: none"> ○ HMRC ○ the Financial Conduct Authority ○ the Prudential Regulation Authority ○ the Payment Systems Regulator ○ Pay UK ○ the Financial Ombudsman Service ○ the Information Commissioner's Office ○ the Financial Services Compensation Scheme • For management and audit of our business operations, including accounting. • To carry out monitoring and to keep records (see below). • To administer our good governance requirements, such as internal reporting and compliance obligations or administration required for AGM processes. • For market research and analysis and developing statistics. • For direct marketing communications by the Society, and only where we believe the information may be of interest to you. If you do not wish to receive marketing, please let us

	<p>know.</p> <ul style="list-style-type: none"> • When we share your personal data with these other people or organisations (where applicable): <ul style="list-style-type: none"> ○ Our legal and other professional advisers, auditors and actuaries ○ Financial institutions and trade associations ○ Governmental and regulatory bodies such as: <ul style="list-style-type: none"> ▪ HMRC ▪ the Financial Conduct Authority ▪ the Prudential Regulation Authority ▪ the Payment Systems Regulator ▪ Pay UK ▪ the Financial Ombudsman Service ▪ the Information Commissioner's Office ▪ the Financial Services Compensation Scheme ○ Other organisations and business who provide services to us, such as: <ul style="list-style-type: none"> ▪ debt recovery agencies ▪ backup and server hosting providers ▪ IT software and maintenance providers ▪ document storage providers ▪ suppliers of other back-office functions ▪ buyers and their professional representatives as part of any restructuring or sale of our business or assets ○ Electronic identification verification services, Financial Crime Prevention Agencies and Credit Reference Agencies (please see below for more detail) ○ Market research organisations who help us to develop and improve our products and services
<p>Legal obligations</p>	<p>Processing necessary to keep to our legal obligations:</p> <ul style="list-style-type: none"> • To comply with laws that apply to us. • To establish, defend and enforce our legal rights. • For activities intended to prevent, detect and investigate crime. • To carry out monitoring and keep records (see below). • To deal with requests from you to exercise your rights under data protection laws. • To process information about a crime or offence and any related proceedings. This will apply in cases where we know of or suspect fraud. • Where we share your personal data with these other people or organisations (where applicable): <ul style="list-style-type: none"> ○ Your guarantor (or if you are the guarantor, with the applicant) ○ Joint borrowers ○ Your power of attorney ○ Fraud Prevention Agencies ○ Law enforcement agencies and governmental and regulatory bodies, such as: <ul style="list-style-type: none"> ▪ HMRC ▪ the Financial Conduct Authority ▪ the Prudential Regulation Authority ▪ the Payment Systems Regulator ▪ Pay UK ▪ the Financial Ombudsman Service ▪ the Information Commissioner's Office ▪ the Financial Services Compensation Scheme (depending on the circumstances of the sharing)

	<ul style="list-style-type: none"> ▪ courts and other organisations where necessary for the administration of justice, to protect vital interests and to protect the security or integrity of our business operations
Consent	<p>Processing with your consent:</p> <ul style="list-style-type: none"> • When you ask that we share your personal data with someone else and give your consent for that. • For direct marketing communication. • For some of our processing of special categories of personal data, such as about your health or if you are a vulnerable customer. It will be explained to you when we ask for that explicit consent what the purpose is, and how we will share and use it.)
Public Interest	<p>Processing for a substantial public interest under laws that apply to us where this helps us to meet our broader social obligations, such as processing that we need to do to fulfil our legal obligations and regulatory requirements.</p>

How and when can you withdraw your consent?

Much of what we do with your personal data is not based on your consent, instead it is based on other lawful bases (as explained above).

For processing that is based on your consent, you have the right to take back that consent for future processing at any time. You can do this by contacting us using the details above. This might mean that we cannot send you some marketing communications.

Do we share your personal data with third parties?

We will share your personal information with third parties where required to fulfil our business relationship with you, where required by law, or where we have another legitimate interest in doing so.

Some examples of third parties that we would expect to share your personal data with are:

- Our system providers and suppliers that allow us to function as a business
- Payment service providers
- Law enforcement and government agencies
- Regulators

Any third parties that we use are required to have appropriate security measures to protect your personal data in line with our policies. We do not allow third parties to use your personal data for their own purposes unless they are separately permitted to do. We only permit third parties to process your personal data for specified purposes and as instructed by us.

Is your personal data transferred outside the UK?

We are based in the UK and do not normally transfer personal data outside the UK. However, we may use third parties, such as system providers, suppliers or services who may transfer data to, or store data in, locations both inside and outside the UK.

We also share some personal data with Credit Reference Agencies as well as Financial Crime Prevention Services who may have operations both inside and outside of the UK. Where we do use providers that send information outside of the UK, they are required to have suitable safeguards in place to protect it.

How do we share your information with Credit Reference Agencies?

Depending on your business relationship with us, we may share your personal data with Credit Reference Agencies (CRAs) for identity verification and financial crime prevention purposes. To do this, we will supply your personal data to CRAs and they will give us information about you. CRAs will supply to us financial crime prevention information from public sources (including the electoral register) and shared from financial crime prevention agencies.

We will use this information to:

- verify the accuracy of the information you have provided to us.
- prevent criminal activity, such as fraud and money laundering.

We may continue to exchange information about you with CRAs while you have a relationship with us, depending on the nature of our business relationship.

How do we share your information with Financial Crime Prevention Agencies?

The personal data we collect from you may be shared with Financial Crime Prevention Agencies who will use it to prevent financial crime, such as fraud and money-laundering. If financial crime is detected, you could be refused certain services, finance or employment. **For more information see "Data Privacy Notices from other organisations" below.**

What should you do if your personal data changes?

You should tell us without delay so that we can update our records. You can do this by email (either at mortgageadmin@bibs.co.uk or savings@bibs.co.uk) or by writing to our Head Office.

Do you have to provide your personal data to us?

The personal information you have provided to us is limited to only that which we need to maintain our business relationship. This may include contact details, correspondence address and similar information. Without this information we would find it difficult to maintain this business relationship.

How long do we keep your personal data?

If for some reason our business relationship comes to an end, we may keep a record of your contact details for future reference.

Any other personal information you have provided us will be kept in line with our data retention practices. If you would like further information about our data retention practices, contact us.

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 want to exercise any of them, we will explain at that time if for some reason they are not applicable.

Right to be informed	You can ask about how we collect and use your data, and how long we keep it for.
Right of access	You can ask for a copy of your data, commonly referred to as a Subject Access Request (SAR).
Right to rectification	You can ask us to correct any errors with your data.
Right to erasure	You can request that we delete your data.
Right to restrict processing	You can ask us to limit how we use your data.
Right to data portability	You can ask us to transfer your data.
Right to object	You can ask us to stop processing your data, although in some cases we may continue to do so.
Rights related to automated decision-making, including profiling	You have some protections against automated decision making and profiling. You can request information about the processing that takes place, and ask for human intervention or challenge a decision.

You have the right to complain to the Information Commissioner's Office which enforces data protection laws: <https://ico.org.uk/>.

If you want to exercise any of these rights with Credit Reference Agencies, Financial Crime Prevention Services, or a broker or other intermediary who is data controller in its own right, you should contact them directly.

Your marketing preferences and what this means

We may use your work address, phone number, or email address to contact you about matters which may be of interest to you, taking into account our business relationship with you. This means we do this only if we have a legal ground which allows it under data protection laws – see above for what our legal ground for marketing is.

You can stop marketing at any time by contacting us at Head Office or by following the instructions on how to do that in the marketing email or other communication.

Data privacy notices from other organisations

We have mentioned that we may share your personal data with Credit Reference Agencies, and Financial Crime Prevention Agencies. Further information and the relevant Privacy Notices are available if you ask.

The identities of the CRAs, their role as Financial Crime Prevention Agencies, the data they hold, the ways in which they use and share personal data, data retention periods and your data protection rights with the CRAs are explained in more detail at <https://ico.org.uk/your-data-matters/>. A Credit Reference Agency Information Notice (CRAIN) is also accessible from each of the three CRAs – following any of these three links will also take you to the same CRAIN document:

TransUnion www.transunion.co.uk/crain

Equifax www.equifax.co.uk/crain

Experian www.experian.co.uk/crain