



**General Data Protection Regulation 2018
Customer Privacy Notice for
Mortgage Products
(Direct & Introduced)**

Your personal information and what we do with it

Who we are, how to contact us and our data protection officer

Tipton & Coseley Building Society, 70 Owen Street Tipton West Midlands DY4 8HG is a Data Controller of your personal information. This means information that is about you or from which we can identify you. This privacy notice describes how we deal with your personal information under the relevant data protection laws. When we use terms such as **we**, **us** and **our** in this notice, we mean Tipton & Coseley Building Society.

If you have questions about this privacy notice or wish to find out about any of your rights mentioned in it please contact our Data Protection Officer at the above address, or via our website (www.thetipton.co.uk).

Throughout this privacy notice we mention the Fraud Prevention Agencies and Credit Reference Agencies privacy notices, we can share these with you on request via our website, or by contacting us at the address above or by visiting one of our branches. Please read them carefully and contact those organisations if you have questions (details are in their notices).

This privacy notice may be updated from time to time. You should check our website regularly so that you can read the up to date version. Alternatively, we will provide you an updated copy on request.

Have you been introduced to us by a broker or other intermediary?

Our mortgage products are available through our branches and by telephone. Additionally, our mortgage products are available through professional advisers, mortgage brokers and 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 find out about 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.

What kinds of personal information about you do we process?

This will depend on the products or services that you apply for and (if your application is successful) obtain from us. Before we explain what particular information we need in relation to our mortgage products we will explain what information is relevant to all of our products and services.

Personal information that we generally process in connection with all our products and services

This includes:

- Your title, full name, your contact details, including your email address, home and mobile telephone numbers;
- Your home address, correspondence address (where different from your home address) and address history;
- Your date of birth and/or age, e.g. to make sure that you are eligible to apply for the product and/or that it is suitable for you;
- Your nationality, if this is necessary for us to comply with our legal and regulatory requirements;
- Records of how you have contacted us and, if you get in touch with us online, details such as your mobile phone location data, IP address and MAC address;
- Personal information which we obtain from Fraud Prevention Agencies (see the section on 'Fraud Prevention Agencies' below); and
- Some special categories of personal data such as about your health details or if you are a vulnerable customer.

Additional personal information that we process in connection with a mortgage

This includes:

- Your financial details e.g. your salary and details of other income, details of your savings, details of your expenditure, and details of account(s) held with other providers if you pay your mortgage from those account(s);
- Details about all of your existing borrowings and loans;
- Personal information about your credit history which we obtain from Credit Reference Agencies including data which originates from Royal Mail (UK postal addresses), local authorities (electoral roll), the insolvency service, Companies' House, other lenders and providers of credit (who supply data to the CRAs), court judgments decrees and administration orders made publicly available through statutory public registers (see the section on 'Credit Reference Agencies' below);
- Information about your employment status including whether you are employed, retired or receive benefits;
- Information about your occupier status, such as whether you are a tenant, live with parents or are an owner occupier of the property in which you live at the time of your application;
- Information which is relevant for your residency and/or citizenship status, such as your nationality, your length of residency in the UK and/or whether you have the permanent right to reside in the 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 family member which you provide in any application.

Joint applicants, guarantors and powers of attorney

If you make a joint application with your spouse, partner, family member or friend we will collect the personal information mentioned above about that person. You must show this privacy notice to the other applicants ensuring they confirm that they know you will share their information with us for the purposes described in it.

If you look now at the “What are the legal grounds” section (below) you will see reference to consent and a description of some limited scenarios where it may be relevant for us to process 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 are an existing borrower and your mortgage has a guarantor, that person will see this privacy notice when there is a change to your mortgage account or if we make contact with them directly.

What is the source of your personal information?

We will generally collect your personal information from you directly. If you are introduced to us by a broker, intermediary or other professional adviser, 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 Fraud Prevention Agencies, Credit Reference Agencies, 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, police and law enforcement agencies. In addition, some of your personal information may come from another part of the Society if you already have a product with us such as a savings account.

Some of the personal information obtained from Credit Reference Agencies will have originated from publicly accessible sources. In particular, Credit Reference Agencies draw on court decisions, bankruptcy registers and the electoral register (also known as the electoral roll). We explain more about Credit Reference Agencies below. We have also mentioned above in the lists of personal information that we process some of the CRAs’ other sources of information (which are our own source of information too).

What are the legal grounds for our processing of your personal information (including when we share it with others)?

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 collecting it, obtaining it (from other organisations), using, sharing, storing, retaining, deleting, destroying and transferring it overseas.

Data protection laws require us to explain what legal grounds justify our processing of your personal information (this includes sharing it with other organisations). For some processing more than one legal ground may be relevant (except where we rely on consent).

Here are the legal grounds that are relevant to us:

- 1) Processing necessary to perform our contract with you for the mortgage product or for taking steps prior to entering into it (during the application stage):
 - a) Administering and managing your mortgage 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 third parties such as when you ask us to share information about your account with them.
 - c) All stages and activities relevant to managing your mortgage including enquiry, application, administration and management of accounts, illustrations, requests for transfers of equity, setting up/changing/removing guarantors.
 - d) When we do what we will call throughout this privacy notice “profiling and other automated decision making” by “automated decision making” we mean making decisions about you, such as your suitability for a mortgage product, using a computer based and automated system without a person being involved in making that decision (at least first time around) and by “profiling” we mean doing some automated processing of your personal information to evaluate personal aspects about you, such as analysing or predicting your economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.
Currently we do not operate any form of profiling or automated decision making however this could change in the future.
- 2) Legitimate interest is mentioned in our privacy notice because data protection law allows the processing of personal information where the purpose is legitimate and is not outweighed by your interests, fundamental rights and freedoms. Those laws call this the legitimate interest’s legal ground for personal data processing.

Where we consider that, on balance, it is appropriate for us to do so, processing necessary for the following legitimate interests which apply to us and in some cases other organisations (who we list below) are:

- a) Administering and managing your mortgage account and services relating to that, updating your records, tracing your whereabouts to contact you about your account and doing this for recovering debt.
- b) To test the performance of our products, services and internal processes.
- c) To adhere to guidance and best practice under the regimes of governmental and regulatory bodies such as HMRC, the Financial Conduct Authority, the Prudential Regulation Authority, the Ombudsman, the Information Commissioner’s Office and under the Financial Services Compensation Scheme.
- d) For management and audit of our business operations including accounting.

- e) To carry out searches at Credit Reference Agencies pre-application, at the application stage, and periodically after that. Where you have been introduced to us by a broker or other intermediary they may do these searches on our behalf.
 - f) To carry out monitoring and to keep records (see below).
 - g) To administer good governance requirements such as internal reporting, compliance obligations and administration required for AGM processes
 - h) For market research and analysis and developing statistics
 - i) For some of our profiling and other automated decision making, in particular where this does not have a legal effect or otherwise significantly affect you. Currently we do not operate any form of profiling or automated decision making however this could change in the future.
 - j) When we share your personal information with these other people or organisations;
 - Your guarantor (if you have one) or family member (Family Assist Mortgage)
 - Joint account holders, trustees and beneficiaries and any person with power of attorney over your affairs (in each case only if relevant to you)
 - Firms where we act as an introducer for example Wren Sterling and Uinsure.
 - Third parties where 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.
 - Governmental and regulatory bodies, such as HMRC, the Financial Conduct Authority, the Prudential Regulation Authority, the Ombudsman, the Information Commissioner's Office and under the Financial Services Compensation Scheme.
 - Tax authorities who are overseas for instance if you are subject to taxes 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, 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 and refer to a separate leaflet for more information).
 - Market research organisations that help us to develop and improve our products and services.
- 3) Processing necessary to comply with our legal obligations:
- a) For compliance with laws that apply to us.
 - b) For establishment, defence and enforcement of our legal rights.
 - c) For activities relating to the prevention, detection and investigation of crime.
 - d) To carry out identity checks, anti-money laundering checks, and checks with Fraud Prevention Agencies pre-application, at the application stage, and periodically after that. Where you have been introduced to us by a broker or other intermediary they may do these searches on our behalf.
 - e) To carry out monitoring and to keep records (see below).
 - f) To deal with requests from you to exercise your rights under data protection laws.
 - g) To process information about a crime or offence and proceedings related to that (in practice this will be relevant if we know or suspect fraud).
 - h) When we share your personal information with these other people or organisations:
 - Your guarantor (if you have one) or family member (Family Assist Mortgage)
 - Joint account holders, trustees and beneficiaries, and the person with power of attorney over your affairs.
 - Third parties such as when you ask us to share information about your account with them.
 - Other account holders or individuals when we have to provide your information to them because some money paid to you by them should not be in your account
 - Fraud Prevention Agencies
 - Law enforcement agencies, 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).
 - Courts and other organisations where it is necessary for the administration of justice, to protect vital interests and to protect the security or integrity of our business operations.
- 4) Processing with your consent:
- a) When you request that we share your personal information with someone else and consent to that.
 - b) For direct marketing communications.
 - c) For some of our profiling and other automated decision making. Currently we do not operate any form of profiling or automated decision making; however, this could change in the future.
 - d) For some of our processing of special categories of personal data such as your health details 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 special categories of personal data such as your health details or if you are a vulnerable customer. If you would like further information please contact our Data Protection Officer.
 - b) Processing that we need to do to fulfil our legal obligations and regulatory requirements.
 - c) When we share your personal information with other people and organisations such as a broker, intermediary or other professional adviser, they need to know that you are a vulnerable customer.
- 6) Processing is necessary to protect your vital interests.

How and when can you withdraw your consent?

For processing that is based on your consent, you have the right to take back that consent for future processing at any time. You can do this by contacting us using the details above. The consequence might be that we cannot send you some marketing communications or that we cannot take into account special categories of personal data such as your health details 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, intermediary or other professional adviser who introduced you to us that you have withdrawn your consent only if it or if we are required to do so when you exercise certain rights under data protection laws. You should make sure to contact them directly to withdraw your consent for what they do with your personal information as a data controller in their own right.

To comply with payment services regulations, we have to share some of your personal information with other payment service providers in some circumstances such as when you ask us to share information about your account with them. Whilst those payment services regulations mention 'consent' for this, 'consent' in that context does not have the same meaning as 'consent' under data protection laws. The legal grounds which may be relevant to this are compliance with our legal obligations, performance of our contract with you, our legitimate interests, or a combination of these. This is why if you ask to withdraw consent from what we do with your personal information where we need to retain it for compliance with 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 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.

Your personal information may be transferred to one or several countries outside the EEA that the EU Commission deems not to have the same regulatory data processing standards. For such a request we would require explicit consent to transfer data to such a country (details of countries available on request) together with us having a relevant safeguarding contract in place. For more information about the suitable safeguards you can contact our Data Protection Officer.

Currently we do not transfer personal information outside the UK or the EEA however this could change in the future.

How do we share your information with credit reference agencies?

In order to process your application, we will perform credit and identity checks on you with one or more credit reference agencies ("CRAs"). To do this, we will supply your personal information to CRAs and they will give us information about you. This will include information from your credit application and about your financial situation and financial history. CRAs will supply to us both public (including the electoral register) and shared credit, financial situation, financial history information and fraud prevention information.

We will use this information to:

- Assess your creditworthiness and whether you can afford to take the product;
- Verify the accuracy of the data you have provided to us;
- Prevent criminal activity, fraud and money laundering;
- Manage your account(s);
- Trace and recover debts; and
- Ensure any offers provided to you are appropriate to your circumstances.

We will continue to exchange information about you with CRAs while you have a relationship with us. We will also inform the CRAs about your settled accounts. If you borrow and do not repay in full and on time, CRAs will record the outstanding debt. This information may be supplied to other organisations by CRAs. 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 in a separate leaflet, available on request or on our website.

When CRAs receive a search from us this may leave 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 will remain in place until your association with the other person is over and your credit history has been separated.

How do we share your information with fraud prevention agencies?

This is explained in more detail in the separate leaflet, available on request or on our website.

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: Tipton & Coseley Building Society 70 Owen Street Tipton West Midlands DY4 8HG or by visiting one of our branches.

If you were introduced to us by a broker, intermediary or other professional adviser who is a data controller in their 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 product or to process your application without having personal information about you. Your personal information is required before you can enter into the relevant contract with us, or it is required during the life of that contract, or it is required by laws that apply to us.

If we already hold some of the personal information that we need – for instance if you are already a customer – we may not need to collect it again when you make your application. In all other cases we will need to collect it except as follows.

In cases where providing some personal information is optional, we will make this clear. For example, we will say in application forms or in branch 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, in person face to face meetings and other communications such as CCTV.

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.

Some of our monitoring may check for obscene or profane content in communications.

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

Telephone calls and face to face meetings between us and you in connection with your application and the mortgage product may be recorded to make sure that we have a record of what has been discussed and what your instructions are.

Profiling and other automated decision making

This section is relevant where we make decisions about you using only technology, and where none of our staff have been involved in the process. We may do this to decide what marketing communications are suitable for you, to analyse statistics and assess lending and insurance risks.

We can do this activity based on our legitimate interests (and they are listed in the section about legal grounds above) only where the profiling and other automated decision making does not have a legal or other significant effect on you. In all other cases, we can do this activity only where it is necessary for entering into or performing the relevant contract, is authorised by laws that apply to us, or is based on your explicit consent. In those cases, you have the right to obtain human intervention to contest the decision (see 'rights in relation to automated decision making which has a legal effect or otherwise significantly affects you' below). Profiling for direct marketing can mean there is a separate right to object (see 'rights to object' below).

Currently we do not operate profiling or automated decision making, however this could change in the future.

For how long is your personal information retained by us?

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

- Retention in case of queries. We will retain the personal information that we need to keep in case of queries from you during the relationship plus 15 years unless we have to keep it for a longer period.

- 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 the relationship plus 15 years unless we have to keep it for a longer period.
- 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 15 years after the end of the relationship and this will be to satisfy our legal and regulatory requirements.
- Unsuccessful Applications. We will retain the personal information that we need to keep in case of a query from you for 1 year following your unsuccessful application.

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

What are your rights under data protection laws?

Here is a list of the rights that all individuals have under data protection laws. They do not apply in all circumstances. If you wish to exercise any of them we will explain at that time if they are applicable or not. The right of data portability is only relevant from May 2018.

- The right to be informed about the 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.

When considering a request from you for erasure of personal data the Society will always take into consideration its legal obligations, for example Money Laundering Requirements, and will deal with each request on its own merits.

With regards to the restriction of processing the Society is committed in ensuring all personal data errors are corrected immediately.

You have the right to complain to the Information Commissioner's Office which enforces data protection laws: <https://ico.org.uk/>. You can contact our Data Protection Officer or request the leaflet "Your Data Protection Rights" by post, email or by visiting one of our branches for more details.

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

Your marketing preferences and what this means

We may use your home address, phone numbers, email address and social media (e.g. Facebook, Google and message facilities in other platforms) to contact you according to your marketing preferences. This means we do this only if we have legal grounds which allows it under the data protection laws – see above for what is our legal grounds for marketing. You can stop our marketing at any time by contacting us 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 share your personal information with Fraud Prevention Agencies and Credit Reference Agencies. They require us to pass on information about how they will use your personal information to perform their services or functions as data controllers in their own right. These notices are separate to our own and are available on request and on our website.

Address: 70 Owen Street Tipton West Midlands DY4 8HG. Tel: 0121 557 2551 www.thetipton.co.uk

We monitor and record phone calls for your security and our training purposes.

Authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority.

Member of the Building Societies Association.