

DATA PROTECTION

CUSTOMER PRIVACY NOTICE

1. PRIVACY NOTICE

This Privacy Notice describes how Harpenden Building Society (the Society, we) will deal with your personal information when we collect it from you when you apply for one of our savings products.

We have a separate Children's Privacy Notice that provides this information in a more child-friendly way <https://www.harpendenbs.co.uk/about-us/your-privacy/childrens-privacy-notice/>.

We also have a separate Broker's Privacy Notice for mortgage brokers <https://www.harpendenbs.co.uk/about-us/your-privacy/broker-privacy-notice/>.

We will also send you a separate Candidate's Privacy Notice if you apply to work with us <https://www.harpendenbs.co.uk/about-us/your-privacy/candidate-privacy-notice/>.

Our Privacy Notices are addressed to those customers subject to the GDPR in the UK and EU only, unless stated otherwise, and may be updated from time to time so please check this website for updates.

2. CONTACT US

If you have any questions about how the Society deals with your personal information, or wish to make a complaint about this, please email the Society's Data Protection Officer (DPO) at privacy@harpendenbs.co.uk or by phoning 01582 765411, or by writing to:

The Data Protection Officer Harpenden Building Society Mardall House
9-11 Vaughan Road Harpenden Hertfordshire AL5 4HU

If you are not satisfied with the Society's handling of any questions about data protection, you can also make a complaint to the Information Commissioner's Office at: ico.org.uk.

3. THIS WEBSITE

3.1 COOKIES

A cookie is a small file of information that is saved on your computer by your browser when you first visit our website. We use cookies to help us to improve how our website works for visitors.

You have to consent to us saving cookies on your computer. So when you first visit our website we invite you to click 'Accept' to us saving cookies. If you click 'Reject' we will not save cookies on your computer, but some aspects of our website may then not work properly.

If you consent to us using cookies, we will anonymize information about how you use our website before sharing it with Google Analytics who will give us feedback on how our website is performing.

Google Analytics is unable to directly identify you from this information. Details of how Google Analytics safeguards this information is available at: <https://support.google.com/analytics/answer/6004245>

Our website also includes links to other organisations' websites, but we have no control over how they deal with your personal information, so we recommend that you read the privacy notice of each website you visit.

Our website also logs your computer's IP address to help us manage the website and its cyber security. We only process this information within the law.

For more information, please refer to our cookie policy available at:
<https://www.harpendenbs.co.uk/about-us/your-privacy/privacy-notice/cookie-policy/>

3.2 CHILDREN'S USE OF THIS WEBSITE

This website is not directed towards children, but we understand that it may be accessed by some of our customers aged under 18. If you are aged over 13 you can give consent, just like an adult, to saving cookies on your computer when you first visit our website.

Where our website is accessed by a child aged under 13, the Society assumes that consent for placing cookies is provided by their parent or guardian.

4. YOUR PERSONAL INFORMATION

Your personal information is data about you or allows you to be identified. Under UK data protection law we are considered as the Controller of the personal information that you share with us, because we are responsible for how and why it is processed.

Your personal information is first processed when we collect it from you, when we use it to provide you our savings or mortgage products, and right through to its deletion when we no longer need it. We explain in this privacy notice how and why we process your personal information, and how we protect it.

4.1 PERSONAL INFORMATION WE PROCESS IF YOU APPLY FOR ANY OF OUR PRODUCTS

The personal information we process when you apply for any of our savings or mortgage products includes:

- Your name and contact details, including your email address, and home, company and mobile telephone number
- Your home address, your correspondence address (where it is different from your home address) your company address (where you are a business customer), and your address history
- Your date of birth and age, to make sure that you are eligible to apply for the product and that it is suitable for you
- Your nationality, and/or place of birth, if this is necessary for us to comply with our legal and regulatory requirements
- Records of how you have contacted us, and
- Some special categories of personal information such as about your health or if you are a vulnerable customer.

We are required by law to process your personal information before we can offer you a savings or mortgage product. Once you have accepted one of our products, we will also need to process your personal information throughout the life of the product in order to comply with the law.

As identified above, we only collect limited special categories of personal information and, to be clear, we do not collect other special categories of personal information about you such as details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, or genetic and biometric data. Nor do we collect any information about any criminal convictions and offences.

4.2 ADDITIONAL PERSONAL INFORMATION FOR SAVINGS PRODUCTS

This additional personal information includes:

- Information about your tax position, so that we can comply with our legal and regulatory requirements
- Where a person other than the savings account holder makes a withdrawal from the account, information about that person and the transaction, and
- Personal information of any parent or legal guardian associated with an account.

In order to manage your savings account and comply with the law, we may collect and/or receive information by performing periodic searches on your financial circumstances with one or more Credit Reference Agencies (CRAs). Any searches will be recorded against your name by a CRA. Further information on this is provided in the CRA leaflet: www.harpendenbs.co.uk/credit-reference-agency-information-notice.

4.3 ADDITIONAL PERSONAL INFORMATION FOR MORTGAGE PRODUCTS

This additional personal information includes information on:

- Your financial health such as your income and savings, summaries of your expenditure, and information about any other savings or mortgage accounts
- Your existing loans
- Your credit history which we obtain from Credit Reference Agencies (CRAs)
- Your current employment status and income
- Whether you own or rent your current property
- Whether you have permanent right to reside in the UK
- Your family background if this is relevant to your mortgage application, and
- Where relevant, information about any guarantor you provide in a mortgage application.

We will collect some of this information directly from you, but some may be collected by your mortgage broker and then shared with us as part of your application.

In order to process your application and comply with the law, we will perform credit and identity checks on you with one or more Credit Reference Agencies (CRAs). We may also perform periodic searches on your financial circumstances to help us manage your mortgage and comply with the law. Any searches

will be recorded against your name by a CRA. Further information on this is provided in the CRA leaflet: www.harpendenbs.co.uk/credit-reference-agency-information-notice.

4.4 JOINT APPLICATIONS, GUARANTORS, AND POWERS OF ATTORNEY

If you make a joint application with your spouse, partner or family member, we will also collect personal information about that person. We will ask the other applicant to read this privacy notice and confirm that they are aware that their personal information will be shared with us as part of the application.

If you apply for a mortgage with a guarantor, we will also ask them to read this privacy notice and confirm that they are aware that their personal information will be shared with us as part of the application.

If someone has power of attorney over your affairs, we will also share this privacy notice with them when we contact them directly.

If we are informed about the death of one of our customers, we may tell the executor(s) with responsibility for the account.

If you're named as an executor in a will, or where you are the confirmed next of kin where there is no will, we can tell you the account balance(s) and interest due up to the date of death. At the request of the executor(s) we will share data with solicitors, HMRC and the customer's beneficiaries.

4.5 CHILDREN'S PERSONAL INFORMATION

Children of all ages can also be customers of savings products with the Society:

- Children under the age of 7 are not allowed to enter a contract for a savings product in their own right, and so their contract with the Society must be entered into by a parent or legal guardian
- Children over the age of 7 can enter a contract themselves, but until they are 13, their parent or guardian have to approve our processing of their personal data, and
- Children over the age of 13 can enter into a contract with us and can approve to us processing their personal information.

Someone acting on behalf of a child will be provided this privacy notice and asked to confirm the information provided, and their marketing preferences in writing.

4.6 IF YOUR PERSONAL INFORMATION CHANGES

If your personal information changes you should tell us without delay so that we can update our records. If you are currently applying for a mortgage with us through a broker, you should also contact them to update your personal information.

4.7 VULNERABLE ADULTS

The Society will assess all adults for vulnerability in order that their needs can be recognized and the Society can treat them fairly. Staff who deal with vulnerable adults are trained to do this in a way that reflects their particular vulnerabilities while respecting their human rights and freedoms. With consent,

we will add notes to our records about any adjustments we need to make, such as using large print when we communicate, to ensure that vulnerable adults find it easier to interact with us.

5. HOW WE USE YOUR PERSONAL INFORMATION

Data protection laws require us to explain which legal bases justify our processing of your personal information. We will explain this to you when we collect your personal information, but if the legal bases change, we will inform you and explain the need for any change. The legal bases are:

- To perform our contract with you
- To comply with the law
- To protect your vital interests
- For a substantial public interest
- For our legitimate interests, or
- With your consent.

5.1 TO PERFORM OUR CONTRACT WITH YOU

We will process your personal information to assess your application and, once approved, to manage your savings or mortgage product for as long as you retain it. We may also need to process the personal information of other people associated with your products such as relatives, guarantors, or those with power of attorney for you to ensure that we can perform our contract with you.

5.2 TO COMPLY WITH THE LAW

We will also process your personal information, and that of any persons associated with your products, to comply with the laws and regulations associated with financial services products. These include data protection laws, the prevention of financial crime, and the prevention of fraud. These also include our obligations under the FCA's 'Consumer Duty' regime.

We may also need to share your personal information with other persons or organisations in order that they too can comply with the law.

Where necessary, we will also process your personal information to defend any future legal claims against us.

5.3 TO PROTECT YOUR VITAL INTERESTS

If you are assessed as vulnerable, we will also process your personal health information in order to tailor our services to you. For example, we may take more time to make sure you understand arrangements relating to your accounts. Rest assured, we will only process health-related information in exceptional circumstances which are restricted by the Data Protection Act 2018.

5.4 FOR A SUBSTANTIAL PUBLIC INTEREST

Where there is an obligation to comply with a substantial public interest, such as preventing financial crime, we will also process your personal information. However, we will only do this under exceptional circumstances which are restricted by the Data Protection Act 2018.

5.5 FOR OUR LEGITIMATE INTERESTS

Under some circumstances, we will need to process your personal information in order to manage the day to day activities of the Society, and sustain its financial health over the long term. This processing can include monitoring access to the Society's website to prevent cyber crime. However, we cannot do this if it would harm your data protection rights and freedoms, and we need to assess this potential harm carefully.

If we were to sell or transfer all or part of the Society, we may need to share customers' personal information as part of the transaction. In this situation, it would be in our legitimate interest to do so. However, we would ensure that there were adequate protections in place before any transfer of personal information.

5.6 WITH YOUR CONSENT

The final legal basis for processing your personal data is your consent for the processing. There are very few situations where your consent is required as we only process customers' personal information for purposes that are connected directly or indirectly to us providing savings and mortgage products.

However, where we must seek consent, such as for marketing, we will ask for a positive, explicit confirmation of your consent to specific processing, and keep a record of this so that we comply with your consent throughout your dealings with the Society.

If at any time you wish to withdraw your consent, this can be done easily by contacting the Society, by email, phone or through your local branch.

6. TRANSFERS OF PERSONAL INFORMATION

In order to manage your savings or mortgage products, we may need to use specialist companies that process your personal information. Categories of specialist companies include:

- IT hosting;
- Document storage;
- Communications;
- Printing;
- Financial Crime screening; and
- Credit scoring.

If you would like further information on the recipients of your personal data, please contact the DPO at privacy@harpendenbs.co.uk.

Where personal information is processed in the European Economic Area (EEA) (the EU plus Norway, Iceland, and Liechtenstein), it is protected through the GDPR as in the UK.

Some companies operate outside the EEA, but do so from countries that the UK recognises has equivalent protections over personal information as under the GDPR (including Switzerland, Israel, Japan, and New Zealand).

Companies based in other countries that do not provide equivalent protections to the GDPR, such as the United States, can only process your personal information under strict controls including standard contract clauses, due diligence checks, and an assessment of the potential risk of disclosure of personal information.

When working with companies and/or transferring information to countries outside the UK, we take appropriate steps to ensure that there is adequate protection in place and that data protection legislation is followed.

If you would like more information about overseas transfers, please contact us.

7. MONITORING AND PROFILING

Where we are required by law, we will monitor the activity of staff, visitors and customers when they deal with the Society. We will only do this to the extent that the law permits us to. For example, the Financial Conduct Authority's regulations requires us to record certain telephone calls, or in person meetings, such as branch visits by customers.

We may also process your personal images as part of our CCTV coverage if you visit the Society's Head Office or a Branch. We would only do this prevent, detect and prosecute crime. We retain these images for 30 days after which they are deleted.

We may also use your personal information to profile your financial situation, your preferences, interests, or behaviour. We would only do this to help us manage your savings or mortgage products, to comply with the law, or to support the long term financial health of the Society.

Any profiling that we carry out will never be fully-automated, and will always include staff oversight. Some profiling may use your personal information, but only after it is anonymized, so that you cannot be identified.

8. YOUR MARKETING PREFERENCES

Where you have consented to receiving updates on Society products similar to those that you already have, we may update you by letter, or by email.

We would only ever contact you according to your marketing preferences, so where you have registered with the Mail Preference Service we will not send you updates on our products by letter.

Where you have registered with the Direct Marketing Association's Email Preference Service, we will not send you updates on our products by email.

Where we are obliged by our regulators to update you about your products, such as the latest interests rates, or features of your products that may no longer be suitable for you, we will update you by letter, email or phone.

With every update about our products, you will have the opportunity to ask us to stop sending updates. You can also do this easily by contacting the Society, by email, phone or through your local branch.

9. RETENTION OF YOUR PERSONAL INFORMATION

Where your personal information has been collected as part of an application for a savings or mortgage product, and it appears that you do not want to proceed, we will retain your personal information for twelve months from your last communication just in case you decide to proceed with your application.

Where your application for a savings or mortgage product proceeds, we will retain your personal information until the product is redeemed or cancelled, and then for an additional period of time to comply with legal or regulatory requirements (including those relating to tax and accounting matters).

At the end of the retention period, we will delete your personal information (or put it beyond use), unless we have to retain it for legal, regulatory, or technical reasons. If we do, we'll make sure that your privacy is protected and only use it for those purposes.

We will take good care of your personal information and will keep it safe. We have rigorous security measures in place to keep your personal information well-protected.

10. YOUR DATA PROTECTION RIGHTS

You have data protection rights over how we use your personal information and you can exercise these rights at any time. You can do this easily by contacting the Society, by email, phone or through your local branch.

Once you ask us to exercise your data protection rights we may need to request specific information from you to help us confirm your identity and to clarify which rights you wish to exercise.

We try to respond to all requests within one month but if we believe that it may take longer, we will inform you.

You will not have to pay a fee to exercise your data protection rights, but we may need to charge a reasonable fee if your request is clearly unfounded, repetitive or excessive.

Your data protection rights are:

- The right to be informed about processing
- The right of access to your personal information
- The right of rectification of your personal data
- The right to object to processing of your personal data
- The right to restrict processing of your personal information
- The right to have your personal data deleted (the right to be forgotten)
- The right to obtain a copy of your personal information, and
- The right to object to automated decision-making.

10.1 THE RIGHT TO BE INFORMED ABOUT PROCESSING

You have the right to be informed about how we will process your personal information. We provide this privacy notice to help to inform you about this. You also have the right to have inaccurate personal information corrected, and we have procedure in place to help maintain accurate records of our customers.

10.2 THE RIGHT OF ACCESS TO YOUR PERSONAL INFORMATION

You also have the right to request access to the personal information held about you, to confirm what personal information and how it is processed.

10.3 THE RIGHT TO RECTIFICATION OF YOUR PERSONAL DATA

You also have the right to request rectification of your personal data. This right enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

10.4 THE RIGHT TO OBJECT TO PROCESSING OF YOUR PERSONAL DATA

Where we process your personal information based on legitimate interests for direct marketing or statistical purposes, you have the right to object to this processing.

10.5 THE RIGHT TO RESTRICT PROCESSING OF YOUR PERSONAL INFORMATION

You also have the right to restrict processing of your personal information:

- Where you believe it as inaccurate
- Have objected to the processing under the legitimate interests for direct marketing and statistical analysis, or
- Where you believe that the processing is unlawful and where you oppose erasure and request restriction instead.

10.6 THE RIGHT TO HAVE YOUR PERSONAL DATA DELETED (THE RIGHT TO BE FORGOTTEN)

The right to have your personal information deleted or 'the right to be forgotten' allows you to request the deletion of your personal information where there is no lawful reason for its continued processing. Requests for deletion may be refused if the personal information has to be retained to comply with the law, or to defend legal claims.

This right may be exercised where:

- the personal information is no longer needed for the purpose for which it was originally collected
- the processing was based on consent which you have since withdrawn
- you object to the processing and there is no overriding legitimate interest for continuing it

- if the personal information is unlawfully processed, or
- if the personal information has to be erased to comply with a legal obligation.

10.7 THE RIGHT TO OBTAIN A COPY OF YOUR PERSONAL INFORMATION

The right to 'information portability' allows you to obtain a copy of your personal information so that you can analyse it or use it for different services.

This right can only be exercised where personal information is processed based on the lawful basis of consent or for performance of a contract, and is carried out by automated means. This right restricts your access to your personal information that is processed electronically.

10.8 THE RIGHT TO OBJECT TO AUTOMATED DECISION-MAKING

This right allows you to request safeguards against the risk that a potentially damaging decision is taken solely without human intervention. You may have the right to obtain human intervention and an explanation of the decision and you may be able to challenge that decision.

10.9 HOW TO EXERCISE YOUR RIGHTS

To exercise your data protection rights, or to find out more details on how we process your personal information, please contact us by email, phone or through your local branch. Please refer to "How to Contact Us" for our email address and phone number. Alternatively write to:

The Data Protection Officer
Harpenden Building Society
Mardall House
9-11 Vaughan Road
Harpenden
Hertfordshire
AL5 4HU

Or privacy@harpendenbs.co.uk

If you wish to exercise any of your data protection rights against the Credit Reference Agencies, or a broker, you should contact them separately.

If you are not happy with the Society's handling of your personal data or its response to your exercise of your rights, you also have the right to complain to the Information Commissioner's Office by visiting ico.org.uk.

End.