

# How we use your information

This Privacy Notice explains how we use your personal information, describes how your personal information is categorised and explains your data protection rights and how to exercise them. We take your privacy seriously and only collect and use your information in accordance with the requirements of the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA 2018) (together these form the 'Data Protection Legislation').

## Who we are and how to contact us

Handelsbanken plc (**Handelsbanken**) is a member of the Handelsbanken group (Group) of companies and is the 'controller' of your personal information. 'Controller' means that because of the relationship we have with you, we can decide how your information is used and for what purpose. Personal information means information about you or information that we can use to identify you.

For clarity, when we use **we**, **us** and **our** in this notice, we mean Handelsbanken.

More information about Handelsbanken can be found in our Annual Report which can be viewed on our website at: [handelsbanken.co.uk](https://handelsbanken.co.uk)

If you have any queries about this Privacy Notice or would like to exercise your data protection rights, you can contact our Data Protection Officer. They can be reached at 25 Basinghall Street, London EC2V 5HA or by emailing: [DataProtectionOffice@handelsbanken.co.uk](mailto:DataProtectionOffice@handelsbanken.co.uk)

We'll update this Privacy Notice from time to time. You'll find an up-to-date version at [handelsbanken.co.uk/privacy](https://handelsbanken.co.uk/privacy) or you can contact your branch. We'll let you know in a timely manner if we make changes to the way we use your data.

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

Our products and services are available through our branches, and professional and financial advisors and anyone else who acts as an intermediary between you and us. In this notice we'll refer to 'brokers and other intermediaries'.

When a broker or other intermediary processes your personal information on our behalf, this Privacy Notice will apply and you should contact our Data Protection Officer to exercise your rights under data protection laws. When a broker or other intermediary processes your personal information as a data controller in its own right, where they can decide how to use your information, their privacy notice will apply, not ours. You'll be able to get a copy from them if you don't have one.

## Business information

If you're a business customer, we collect and hold information about your business in relation to the product(s) and services we provide to you. Information provided to us about any individual associated with your business is considered personal information which we collect and use in accordance with this Privacy Notice and the Data Protection Legislation.

Information relating to your business, which isn't personal information, will also be collected and used by us as shown in this Privacy Notice. In particular, we'll hold your business information as confidential and will only share or disclose it to others as detailed in 'Who we share your personal information with' below. Business information will be kept secure using appropriate security measures and will be kept by us as detailed in 'How long we keep your personal information for' below. Data protection rights only apply to individuals and not to commercial entities.

### What kinds of personal information do we hold about you?

To fulfil our obligations to prospective and existing customers or a person who has a business or financial relationship with the customer including but not limited to guarantors, tenants, persons with power of attorney and family members, we handle different types of personal information about you and them.

We'll also process personal data of the employees of our suppliers and other parties that we have a business relationship with. The Data Protection Legislation requires us to explain to you what categories of personal information we process. This will depend on the products or services you or they apply for and (if your application is successful) get from us.

In Handelsbanken, we organise your personal information into the following categories:

| Handelsbanken categories of personal information | Description (examples)                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|--------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Basic personal information</b>                | <ul style="list-style-type: none"> <li>Your title and full name</li> <li>Contact details, including: your home address, any other contact address, your address history, home and mobile telephone numbers, email address</li> <li>Your date of birth</li> <li>Your nationality, if this is necessary for us to comply with our legal and regulatory requirements</li> <li>Your Tax Identification Number e.g. UK National Insurance number</li> </ul> |
| <b>Assessment and classification</b>             | <ul style="list-style-type: none"> <li>Basic personal information we collect to verify your identity and carry out fraud and anti-money laundering checks to verify that you (or your business, if applicable) meets the conditions needed to open the account(s), and to help us assess financial crime risks</li> <li>Records of any gifts and hospitality offered to Bank staff</li> </ul>                                                          |
| <b>Agreement</b>                                 | <ul style="list-style-type: none"> <li>Your contract and terms and conditions relating to the product(s) and service(s) you hold with us</li> <li>Your signature</li> </ul>                                                                                                                                                                                                                                                                            |
| <b>Communication</b>                             | <ul style="list-style-type: none"> <li>Records of how you have contacted us (such as via our Customer Connect team); and</li> <li>If you get in touch with us online or using our online banking service, details such as your mobile phone location data, IP address and MAC address</li> </ul>                                                                                                                                                       |
| <b>Financial transactions</b>                    | <ul style="list-style-type: none"> <li>Bank account and sort code details</li> <li>Transactions and payments relating to your account(s)</li> <li>Information about your tax position</li> </ul>                                                                                                                                                                                                                                                       |
| <b>Special categories of personal data</b>       | <ul style="list-style-type: none"> <li>Personal information which we obtain from fraud prevention or similar agencies (see the section on fraud prevention agencies below)</li> <li>Information about your health or personal circumstances that is necessary for us to use to protect your economic wellbeing (which means your financial security) or in other circumstances where you need additional support and are at risk of harm.</li> </ul>   |
| <b>Biometric data</b>                            | <ul style="list-style-type: none"> <li>Personal information we collect for identification purposes, to detect and prevent fraud and unlawful acts, that relates to your unique physical, physiological or behavioural characteristics.</li> </ul>                                                                                                                                                                                                      |
| <b>Personal preferences</b>                      | <ul style="list-style-type: none"> <li>Any consents which you provide to us regarding how we use your data, for example your preferences to be contacted for marketing and customer satisfaction survey purposes</li> </ul>                                                                                                                                                                                                                            |
| <b>Audit</b>                                     | <ul style="list-style-type: none"> <li>Your computer's IP address when you access and use our online services, including our website</li> <li>Activity logs when you log on and use our online banking services</li> <li>Some of our premises may use CCTV cameras to protect you, others and the Bank from crime</li> </ul>                                                                                                                           |

**Additional personal information that we process in connection with a lending product (including mortgages)**

This includes, for example:

| Handelsbanken categories of personal information | Description (examples)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|--------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Basic personal information                       | <ul style="list-style-type: none"> <li>Information about your occupier status, such as whether you're a tenant, live with parents or are an owner occupier of the property in which you live at the time of your application</li> <li>Information which is relevant for your residency and/or citizenship status, such as your nationality, your length of residency in the UK and/or whether you have the permanent right to reside in UK</li> <li>Your marital status, family, lifestyle or social circumstances if relevant to the mortgage product (e.g. the number of dependents you have or if you are a widow or widower) and where relevant, information about any guarantor which you provide in any application</li> </ul> |
| Financial transactions                           | <ul style="list-style-type: none"> <li>Details of your income, savings, expenditure, assets and liabilities</li> <li>Details of account(s) held with other providers if you pay your mortgage from those account(s)</li> <li>Details about your existing borrowings and loans (your credit history)</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Assessment and classification                    | <ul style="list-style-type: none"> <li>Personal information which we use to assess your credit worthiness and product suitability to make responsible lending decisions (which may include creating a financial profile of you). Such information includes:               <ul style="list-style-type: none"> <li>- Data provided to us by you</li> <li>- Data we obtain from credit reference agencies</li> <li>- Data which originates from Royal Mail (UK postal addresses)</li> <li>- Local authorities (electoral roll)</li> <li>- The insolvency service</li> <li>- Companies House; and</li> <li>- Other lenders and providers of credit (who supply data to the credit reference agencies)</li> </ul> </li> </ul>             |
| Special categories of personal data              | <ul style="list-style-type: none"> <li>Court judgments, decrees and administration orders publicly available through statutory public registers (see the section on credit reference agencies below)</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |

**Additional personal information that we process in connection with a savings product**

This includes:

| Handelsbanken categories of personal information | Description (examples)                                                                                                                                                                                                                                                                                                                                                                                                                           |
|--------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Financial transactions                           | <ul style="list-style-type: none"> <li>Your salary and details of other income, details of your other savings, and details of account(s) held with other providers if you pay into your savings product from those other account(s)</li> <li>Information about your tax position</li> <li>Where a person other than the savings account holder makes a withdrawal from the account, information about that person and the transaction</li> </ul> |

### Providing us with information about other individuals

If you're an individual banking customer and you make a joint application with your spouse, partner or family member we'll also collect the personal information mentioned above about that person. You must show this Privacy Notice to the other applicant and ensure they give you authority to share their information with us for the purposes described in this Privacy Notice.

If you look now at the "How we use your personal information" section (below), you'll see reference to consent and a description of some limited scenarios showing what we do with personal information. If we ask you to get consent from the joint applicant (such as for marketing) we'll provide a method to record the consent.

If you apply for your mortgage with a guarantor, that person will see this Privacy Notice when they submit their own personal information to us, because they must agree and sign the application documents.

If there's somebody who has power of attorney over your affairs, that person will see this Privacy Notice when we make contact with them directly.

If you provide us with information about other individuals (including, but not limited to, clients, tenants, employees, your business partners, directors, shareholders, account signatories or authorised users) as part of the account opening process or as your business with us develops or changes, we rely on you to ensure you have their authority to process their information.

If you provide us with information about other individuals, you're confirming that you've told them that we may process and disclose their data in the same way that we can for you.

### How we obtain your personal information

We'll generally collect your personal information from you directly. This will include at account opening and during your ongoing relationship with us, for example from transactions and operation of your account(s) with us. If you're introduced to us by a broker or other intermediary or are a person who has a business or financial relationship with the customer, we'll get some basic personal information about you from them when they introduce you to us and as necessary to provide the service.

Where relevant to the product or service you hold with us, we may also get your personal information from places such as:

- fraud prevention agencies
- credit reference agencies
- your employer
- landlord
- other lenders
- HMRC
- Department of Work and Pensions
- publicly available directories and information (e.g. telephone directory, social media, internet, news articles)
- publicly accessible sources (e.g. the electoral registers, also known as the electoral roll)
- debt recovery and/or tracing agents
- other organisations to assist in prevention and detection of crime; and
- police and law enforcement agencies.

Some personal information may come from other members of our Group if you already have a product with them.

Some personal information from credit reference agencies will originally have come from publicly accessible source, in particular, from:

- court decisions
- bankruptcy registers; and
- the electoral register.

We explain more about credit reference agencies below.

### How we use your personal information (including when we share it with others)

We can only use your information if we have an appropriate reason and legal basis to do so. This section explains those reasons and the legal basis under data protection law. In some cases, more than one legal basis shown below may be relevant.

'Legitimate interests' means where we, under data protection law, have a genuine business reason to use your information. An example of this would be to improve the product or service you have with us. "Legitimate interests" does not mean we can use your information to unfairly affect you, your rights or freedoms.

| How we use your information                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Our legal basis                                                                                                       | Our legitimate interests (where applicable)                                                                                                                                                                                                                                                               |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| To understand your financial position and requirements to assess what services we can provide you, whether you're a prospective or current customer                                                                                                                                                                                                                                                                                                                                      | <ul style="list-style-type: none"> <li>• Our legitimate interests</li> </ul>                                          | <ul style="list-style-type: none"> <li>• Being able to contact you</li> <li>• Maintaining and improving efficiency in the delivery of our products, services and obligations</li> <li>• Maintaining and improving the relevancy of our products and services</li> </ul>                                   |
| Administering and managing your account and services, updating your records, and tracing your whereabouts to contact you about your account                                                                                                                                                                                                                                                                                                                                              | <ul style="list-style-type: none"> <li>• To fulfil a contract with you</li> <li>• Our legitimate interests</li> </ul> | <ul style="list-style-type: none"> <li>• Being efficient about keeping up-to-date records</li> <li>• Being able to contact you</li> <li>• Maintaining and improving efficiency in the delivery of our products, services and obligations</li> <li>• Complying with our regulatory requirements</li> </ul> |
| All stages and activities relevant to managing your account. These include enquiry, application, administration and management of accounts, illustrations, requests for transfers of equity, setting up/changing/removing guarantors, to administer payments to and from you                                                                                                                                                                                                             | <ul style="list-style-type: none"> <li>• To fulfil a contract with you</li> <li>• Our legitimate interests</li> </ul> | <ul style="list-style-type: none"> <li>• To recover monies owed to the Bank</li> </ul>                                                                                                                                                                                                                    |
| When taking steps to recover debt if you have a lending product that's in arrears                                                                                                                                                                                                                                                                                                                                                                                                        | <ul style="list-style-type: none"> <li>• To fulfil a contract with you</li> <li>• Our legitimate interests</li> </ul> | <ul style="list-style-type: none"> <li>• To recover monies owed to the Bank</li> </ul>                                                                                                                                                                                                                    |
| Sharing your personal information with other payment services providers. For example, when you ask us to share information about your account with them                                                                                                                                                                                                                                                                                                                                  | <ul style="list-style-type: none"> <li>• To fulfil a contract with you</li> </ul>                                     |                                                                                                                                                                                                                                                                                                           |
| To carry out credit application searches (where you apply for credit with us) with credit reference agencies, and to make credit related decisions about you (which may include undertaking credit assessments and creating a financial profile of you), such as setting credit limits, interest rate, fees and other charges applied to your account. Where you've been introduced to us by a broker or other intermediary, they may do these credit application searches on our behalf | <ul style="list-style-type: none"> <li>• Our legitimate interests</li> <li>• To fulfil a contract with you</li> </ul> | <ul style="list-style-type: none"> <li>• Complying with our regulatory requirements</li> <li>• To assess your credit worthiness, product suitability and make responsible lending decisions</li> <li>• Protecting the Bank from financial crime</li> </ul>                                                |
| To test and improve the performance of our products, services and internal processes                                                                                                                                                                                                                                                                                                                                                                                                     | <ul style="list-style-type: none"> <li>• Our legitimate interests</li> </ul>                                          | <ul style="list-style-type: none"> <li>• Maintaining and improving efficiency in the delivery of our products, services and obligations</li> <li>• Developing products and services and setting appropriate pricing</li> </ul>                                                                            |
| For management and audit of our business operations including accounting                                                                                                                                                                                                                                                                                                                                                                                                                 | <ul style="list-style-type: none"> <li>• Our legitimate interests</li> </ul>                                          | <ul style="list-style-type: none"> <li>• Being efficient about keeping up to date records</li> <li>• Internal and external accounting</li> <li>• Maintaining and improving efficiency in the delivery of our services and obligations</li> <li>• Complying with our regulatory requirements</li> </ul>    |
| To monitor and analyse the conduct of your account and to keep customer records                                                                                                                                                                                                                                                                                                                                                                                                          | <ul style="list-style-type: none"> <li>• Our legitimate interests</li> <li>• Our legal obligations</li> </ul>         | <ul style="list-style-type: none"> <li>• Being efficient about keeping up to date records</li> <li>• Maintaining and improving efficiency in the delivery of our products, services and obligations</li> <li>• Complying with our regulatory requirements</li> </ul>                                      |
| To meet our obligations, guidance and best practice under governmental and regulatory bodies such as HMRC, the Financial Conduct Authority, the Prudential Regulation Authority, the Ombudsman, the Bank of England, the Information Commissioner's Office, the Swedish Financial Supervisory Authority and under the Financial Services Compensation Scheme                                                                                                                             | <ul style="list-style-type: none"> <li>• Our legitimate interests</li> </ul>                                          | <ul style="list-style-type: none"> <li>• Complying with our regulatory requirements</li> </ul>                                                                                                                                                                                                            |

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|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| To meet our good governance requirements and those of other members of our Group, such as internal reporting and compliance obligations or administration required for those processes                                                                                                                                                                                                                                                                                  | <ul style="list-style-type: none"> <li>• Our legitimate interests</li> </ul>                                                                                                                                                                                                                                                    | <ul style="list-style-type: none"> <li>• Being efficient at keeping up to date records</li> <li>• Internal and external accounting</li> <li>• Maintaining and improving efficiency in the delivery of our products, services and obligations</li> <li>• Complying with our regulatory requirements</li> </ul> |
| To undertake analysis and develop statistics                                                                                                                                                                                                                                                                                                                                                                                                                            | <ul style="list-style-type: none"> <li>• Our legitimate interests</li> </ul>                                                                                                                                                                                                                                                    | <ul style="list-style-type: none"> <li>• Maintaining and improving efficiency in the delivery of our products, services and obligations</li> <li>• Developing products and services and setting appropriate pricing</li> </ul>                                                                                |
| For the management and assessment of financial crime risks and for compliance with all laws and regulations that apply to us and members of our Group, such as anti-money laundering, counter terrorism financing, financial sanctions, anti fraud, anti-bribery and corruption, immigration and anti-terrorism laws, and banking regulations                                                                                                                           | <ul style="list-style-type: none"> <li>• Our legal obligations</li> <li>• Our legitimate interests</li> <li>• In the substantial public interest, in order to prevent or detect unlawful acts</li> </ul>                                                                                                                        | <ul style="list-style-type: none"> <li>• Complying with our regulatory requirements</li> <li>• Protecting you, others and the bank from financial crime</li> <li>• Assess and manage financial crime risks in order to protect you, others and the company</li> </ul>                                         |
| For establishment, defence and enforcement of our legal rights or those of any other member of our Group                                                                                                                                                                                                                                                                                                                                                                | <ul style="list-style-type: none"> <li>• Our legal obligations</li> </ul>                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                               |
| To verify your identity and carry out checks to help us and others prevent and detect fraud and money laundering. As part of that customer due diligence process, we undertake such checks with credit reference agencies, fraud prevention agencies and similar organisations at pre-application, at the application stage, and periodically after that. Where you've been introduced to us by a broker or other intermediary they may do these searches on our behalf | <ul style="list-style-type: none"> <li>• Your consent to use biometric data to verify your identity</li> <li>• Our legal obligations</li> <li>• Our legitimate interests</li> <li>• In the substantial public interest, in order to prevent or detect unlawful acts</li> </ul>                                                  | <ul style="list-style-type: none"> <li>• Complying with our regulatory requirements</li> <li>• Protecting you, others and the bank from financial crime</li> </ul>                                                                                                                                            |
| For activities relating to the prevention, detection and investigation of crime                                                                                                                                                                                                                                                                                                                                                                                         | <ul style="list-style-type: none"> <li>• Our legal obligations</li> <li>• Our legitimate interests</li> <li>• In the substantial public interest, in order to prevent or detect unlawful acts</li> <li>• Making a disclosure in good faith under either of the Terrorism Act 2000 or the Proceeds of Crime Act 2002.</li> </ul> | <ul style="list-style-type: none"> <li>• Protecting you, others and the bank from crime</li> </ul>                                                                                                                                                                                                            |
| To deal with requests from you to exercise your rights under data protection laws                                                                                                                                                                                                                                                                                                                                                                                       | <ul style="list-style-type: none"> <li>• Our legal obligations</li> </ul>                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                               |
| To investigate and resolve complaints from you or raised through a third party such as a regulatory body or alternative dispute resolution scheme                                                                                                                                                                                                                                                                                                                       | <ul style="list-style-type: none"> <li>• Our legal obligation</li> <li>• Our legitimate interests</li> </ul>                                                                                                                                                                                                                    | <ul style="list-style-type: none"> <li>• Complying with our regulatory requirements</li> <li>• To respond to your needs or complaints</li> <li>• To prevent errors and enhance products and services.</li> </ul>                                                                                              |
| When you request that we share your personal information with someone else, such as to your accountants, lawyers or other professional advisers, or to other members of our Group, e.g. Handelsbanken Wealth and Asset Management, so they can contact you about products and services you have expressed interest in                                                                                                                                                   | <ul style="list-style-type: none"> <li>• Your consent</li> </ul>                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                               |
| In specific circumstances, we may need to process special categories of personal data; for example, your health or personal circumstances where we may need to take reasonable steps to protect and support you as a vulnerable customer                                                                                                                                                                                                                                | <ul style="list-style-type: none"> <li>• Our legitimate interests</li> <li>• In the substantial public interest where needed to protect your economic wellbeing or to protect you from harm</li> </ul>                                                                                                                          | <ul style="list-style-type: none"> <li>• To meet our regulatory obligations to protect vulnerable customers</li> <li>• To ensure the wellbeing of our customers</li> </ul>                                                                                                                                    |

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| Where you're a customer to send you information about products and services which we believe you may be interested in and/or to participate in our customer satisfaction surveys, where you have asked to opt-in to such communications                                                                                                                                                                                                                                                                                                                                              | <ul style="list-style-type: none"> <li>Your consent</li> </ul>                                                                                   |                                                                                                                                                                                                                                       |
| Where you're a prospective customer to contact you by post or phone to introduce ourselves or in response to a request from you for information about our services, which may also be by email                                                                                                                                                                                                                                                                                                                                                                                       | <ul style="list-style-type: none"> <li>Our legitimate interest</li> </ul>                                                                        | <ul style="list-style-type: none"> <li>Being able to contact you</li> <li>Business development</li> </ul>                                                                                                                             |
| Where you're a customer (or former customer) to participate in a review of the products and/or services that we've provided to you, where your response helps us meet our regulatory requirements                                                                                                                                                                                                                                                                                                                                                                                    | <ul style="list-style-type: none"> <li>Our legitimate interests</li> </ul>                                                                       | <ul style="list-style-type: none"> <li>Complying with our regulatory requirements</li> </ul>                                                                                                                                          |
| To contact you in connection with products or services that you or your employer provide to the Bank                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <ul style="list-style-type: none"> <li>Our legitimate interests</li> </ul>                                                                       | <ul style="list-style-type: none"> <li>Being able to contact you</li> <li>Maintaining and improving efficiency in the delivery of our products, services and obligations</li> </ul>                                                   |
| To contact you about products or services that we provide to you or your employer (for example, changes to account terms and conditions)                                                                                                                                                                                                                                                                                                                                                                                                                                             | <ul style="list-style-type: none"> <li>To fulfil a contract with you</li> <li>Our legitimate interests</li> <li>Our legal obligations</li> </ul> | <ul style="list-style-type: none"> <li>Being able to contact you about any changes to the products you hold with us</li> <li>To help you manage your account(s)</li> <li>To notify you of any important regulatory matters</li> </ul> |
| If you've downloaded the Bank's Individual Banking app, we may send information to the device where the app is installed as push notifications. Such messages may, for example, include information about transactional activity on your cards and/or payment accounts, including pending e-commerce transactions. You can choose whether the notifications are sent to your device or not via the app settings. You can also decide how the information is displayed on the device's screen when locked, via its system settings. The information sent to your device is encrypted. | <ul style="list-style-type: none"> <li>To fulfil a contract with you</li> </ul>                                                                  |                                                                                                                                                                                                                                       |
| To train, develop, maintain and validate our models and methods for risk analyses                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <ul style="list-style-type: none"> <li>Our legitimate interests</li> </ul>                                                                       | <ul style="list-style-type: none"> <li>Complying with our regulatory requirements</li> <li>Protecting you, others and the bank from financial crime</li> </ul>                                                                        |

## How you can withdraw your consent

In most cases we don't rely on your consent to use your personal information, usually our legal basis for using it is to meet our legal obligations or to fulfil a contract with you. However, where we do rely on your consent and you've given us this (for example, if you opt-in to receive information about our products and services), you have the right to withdraw your consent at any time. You can do this by contacting us using the details on the front page.

Please be aware that withdrawing your consent might mean that we can't send you marketing communications, however there are some circumstances where we may still use your contact details to send you important information, such as to tell you about changes to our contact details, or to comply with our regulatory obligations (such as to provide you with proposed changes to your account terms and conditions).

If you were introduced to us through a broker or other intermediary, we'll tell the broker or other intermediary that you've withdrawn your consent, only if they're processing your personal information on our behalf or if we're required to do so. As they are a data controller in their own right, you need to contact them directly to withdraw your consent for what they do with your personal information.

To meet payment services regulations we may be required to share some of your personal information with other payment service providers, for example, when you ask us to share information about your account with them. 'Consent' under the payment services regulations, doesn't have the same meaning as 'consent' under data protection laws. So if you withdraw your consent, we may still have to hold and use some of your personal information to meet payment service regulations.



## Who we share your personal information with

In relation to how we use your information as described above, we may (where necessary, applicable and relevant) share your personal information with:

| Person/organisation                                                                                                                                                                                                                                                                                                 | Our legal basis                                                                                                    | Our legitimate interests (where applicable)                                                                                                                                                                                                                                                                                                             |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Your guarantor (if you have one) and any person who provides security for any of your obligations to us.                                                                                                                                                                                                            | <ul style="list-style-type: none"> <li>• Our legal obligations</li> <li>• To fulfil a contract with you</li> </ul> |                                                                                                                                                                                                                                                                                                                                                         |
| Joint account holders, card holders on your account who aren't joint account holders, trustees and beneficiaries and any person with power of attorney over your affairs (in each case only if relevant to you)                                                                                                     | <ul style="list-style-type: none"> <li>• Our legal obligations</li> <li>• To fulfil a contract with you</li> </ul> |                                                                                                                                                                                                                                                                                                                                                         |
| Other residents at your property where it's being used as security for a loan and we need to ask for their consent                                                                                                                                                                                                  | <ul style="list-style-type: none"> <li>• Our legal obligations</li> <li>• Our legitimate interests</li> </ul>      | <ul style="list-style-type: none"> <li>• Complying with our regulatory requirements</li> </ul>                                                                                                                                                                                                                                                          |
| Members of our Group                                                                                                                                                                                                                                                                                                | <ul style="list-style-type: none"> <li>• Consent</li> <li>• Our legitimate interests</li> </ul>                    | <ul style="list-style-type: none"> <li>• Being efficient at keeping up to date records</li> <li>• Maintaining and improving efficiency in the delivery of our products, services and obligations</li> <li>• Internal and external accounting</li> <li>• Assess and manage financial crime risks in order to protect you, others and the Bank</li> </ul> |
| Other payment services providers, for example, when you ask us to share information about your account with them (to administer payments to and from you)                                                                                                                                                           | <ul style="list-style-type: none"> <li>• Our legal obligations</li> <li>• To fulfil a contract with you</li> </ul> |                                                                                                                                                                                                                                                                                                                                                         |
| Individuals or organisations making payments into your accounts, where the name on your account is required for confirming that the payment is going to the correct recipient                                                                                                                                       | <ul style="list-style-type: none"> <li>• Our legal obligations</li> </ul>                                          |                                                                                                                                                                                                                                                                                                                                                         |
| The broker or other intermediary who introduced you to us                                                                                                                                                                                                                                                           | <ul style="list-style-type: none"> <li>• Our legitimate interests</li> </ul>                                       | <ul style="list-style-type: none"> <li>• Being efficient at keeping up to date records</li> <li>• Maintaining and improving efficiency in the delivery of our products, services and obligations</li> <li>• Internal and external accounting</li> </ul>                                                                                                 |
| Our legal and other professional advisers, auditors and actuaries                                                                                                                                                                                                                                                   | <ul style="list-style-type: none"> <li>• Our legitimate interests</li> </ul>                                       | <ul style="list-style-type: none"> <li>• Being efficient at keeping up to date records</li> <li>• Maintaining and improving efficiency in the delivery of our products, services and obligations</li> <li>• Complying with our regulatory requirements</li> <li>• Internal and external accounting</li> </ul>                                           |
| Financial institutions, payment card schemes and trade associations, where necessary to comply with applicable laws and regulations (such as immigration, anti-money laundering and anti-terrorism), and where we consider it reasonably necessary to assist us or other organisations to fight crime and terrorism | <ul style="list-style-type: none"> <li>• Our legitimate interests</li> </ul>                                       | <ul style="list-style-type: none"> <li>• Complying with our regulatory requirements</li> <li>• To protect you, others and the Bank from financial crime</li> </ul>                                                                                                                                                                                      |



|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                  |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Other financial service providers, where they also have a security over a property or other asset, and where legal proceedings are being considered                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <ul style="list-style-type: none"> <li>• Our legitimate interests</li> </ul>                                                                                                                                                         | <ul style="list-style-type: none"> <li>• Establishment, defence and enforcement of legal rights</li> <li>• Efficient handling of recovery of security</li> </ul>                                                                                                                                                 |
| <p>Our approved and contracted professional service providers who provide services to us and to you, such as: those who provide additional services to you under your agreement, our payment processing service providers, our secure confidential waste destruction and document storage providers, and our IT software and maintenance providers, including Software-as-a-Service providers and other providers of cloud products and services.</p> <p>There may be occasions where our payment processing service providers will be a separate data controller under the Data Protection Legislation because they (or any member of their group), will need to process your information relating to payments. They will need to do this to:</p> <p>i) comply with applicable laws, regulations and their own compliance obligations which may include: voluntary codes, court orders, agreements or treaties that are applicable to the provider (or a member of their group), international and industry guidance and the provider's internal policies or procedures;</p> <p>ii) detect, prevent and investigate financial crime;</p> <p>iii) enforce or defend their rights (or those of a member of their group), and</p> <p>iv) manage their operational requirements.</p> <p>The payment processing service provider will only process your information for any one or more of the above purposes where this is strictly necessary.</p> | <ul style="list-style-type: none"> <li>• Our legitimate interests</li> </ul>                                                                                                                                                         | <ul style="list-style-type: none"> <li>• Being efficient at keeping up to date records</li> <li>• Maintaining and improving efficiency in the delivery of our products, services and obligations</li> <li>• Complying with our regulatory requirements</li> </ul>                                                |
| Buyers and their professional representatives as part of any restructuring or sale of our business or assets (e.g. the Bank of England in its role as the UK's Resolution Authority)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <ul style="list-style-type: none"> <li>• Our legitimate interests</li> </ul>                                                                                                                                                         | <ul style="list-style-type: none"> <li>• Being efficient at keeping up to date records</li> <li>• Complying with our legal and regulatory requirements</li> <li>• Internal and external accounting</li> </ul>                                                                                                    |
| Licensed credit reference agencies (see below where we explain more)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <ul style="list-style-type: none"> <li>• Our legitimate interests</li> </ul>                                                                                                                                                         | <ul style="list-style-type: none"> <li>• To assess credit worthiness, product suitability and make responsible lending decisions</li> <li>• To protect you, others and the bank from financial crime</li> <li>• Complying with our regulatory requirements</li> </ul>                                            |
| Approved and contractually appointed marketing, insights and survey organisations who help us to develop and improve our products and services                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <ul style="list-style-type: none"> <li>• Our legitimate interests</li> </ul>                                                                                                                                                         | <ul style="list-style-type: none"> <li>• Maintaining and improving efficiency in the delivery of our products, services and obligations</li> <li>• Maintaining and improving the relevancy of our products and services</li> <li>• To help us understand how we can improve our products and services</li> </ul> |
| Licensed fraud prevention agencies (see below where we explain more)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <ul style="list-style-type: none"> <li>• Our legal obligations</li> <li>• Our legitimate interests</li> </ul>                                                                                                                        | <ul style="list-style-type: none"> <li>• To protect you, others and the Bank from financial crime</li> <li>• To meet our regulatory obligations</li> </ul>                                                                                                                                                       |
| Law enforcement agencies and governmental and regulatory bodies such as HMRC, Department of Work and Pensions, the Financial Conduct Authority, the Prudential Regulation Authority, the Ombudsman, the Information Commissioner's Office, the Swedish Financial Supervisory Authority and under the Financial Services Compensation Scheme                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <ul style="list-style-type: none"> <li>• Our legal obligations</li> <li>• Our legitimate interests</li> <li>• Making a disclosure in good faith under either of the Terrorism Act 2000 or the Proceeds of Crime Act 2002.</li> </ul> | <ul style="list-style-type: none"> <li>• To protect you, others and the bank from crime</li> <li>• To meet our regulatory obligations</li> </ul>                                                                                                                                                                 |

Courts and other organisations where it's necessary for the administration of justice, to protect vital interests and to protect the security or integrity of our business operations

- Our legal obligations
- Our legitimate interests

- To protect you, others and the Bank from crime

## Transfers of your personal information outside of the UK

We're based in the UK, but sometimes we may need to transfer your personal information outside the UK.

If it's processed within the European Economic Area (EEA) then it's protected by data protection standards similar to those in the UK. Some countries outside the EEA also have adequate protection for personal information under laws that apply to us.

We'll make sure that suitable safeguards are in place before we transfer your personal information to countries outside the EEA. Safeguards include:

- contractual obligations imposed on the recipients of your personal information which require them to protect your personal information to the standard required in the UK; and
- requiring the recipient to subscribe to 'international frameworks' intended to enable secure data sharing to protect personal information.

## How do we share your information with credit reference agencies (CRAs)?

In order to process your application, we'll perform credit and identity checks on you with one or more CRAs. Where you take banking services from us, we may also make periodic searches at CRAs to manage your account with us. To do this, we'll 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 give us both public (including the electoral register) and shared credit, financial situation and financial history information and fraud prevention information.

We'll 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'll continue to exchange information about you with CRAs while you have a relationship with us. This information may be supplied to other organisations by CRAs.

When CRAs receive a credit application search or director's enquiry search, they'll place a hard search footprint on your credit file that may be seen by other lenders. Where we carry out a customer enquiry search (for example to verify your identity) this will leave a soft footprint on your credit file which will be viewable to you but not to other lenders.

If you're making a joint application, or tell us that you have a spouse or financial associate, we'll link your records together, so you should make sure you discuss this with them, and share this information, before applying. CRAs will also link your records together and these links will remain on your and their files until you or your partner successfully files for a disassociation with the CRAs to break that link.

CRAs require us to pass on to you information about how they'll use your personal information to perform their services or functions as data controllers in their own right. However, further details as to 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 their own notices. These notices are separate to our own and can be found using the following links:

TransUnion: [transunion.co.uk/crain](https://transunion.co.uk/crain)

Equifax: [equifax.co.uk/crain](https://equifax.co.uk/crain)

Experian: [experian.co.uk/crain](https://experian.co.uk/crain)

## Preventing financial crime

We'll use your personal information to carry out customer due diligence when you are opening an account and throughout your time as a Bank customer. This includes fraud prevention and money laundering checks, verification of your identity (including using your biometric data), sanctions checks and adverse media checks.

As part of our efforts to prevent financial crime, we'll share your personal information with fraud prevention agencies such as Cifas ([cifas.org.uk/fpn](https://cifas.org.uk/fpn)), and other similar organisations. We will also search:

- publicly available directories and information (e.g. telephone directory, social media, internet, news articles);
- registers including HMRC; and
- other public registers held by organisations such as the Financial Conduct Authority and Prudential Regulation Authority.

We, and fraud prevention agencies may also enable law enforcement agencies to access and use your personal information to detect, investigate and prevent crime. If we, or a fraud prevention agency, determine that you pose a fraud or money laundering risk, we may refuse to provide the services or financing you've requested, or we may stop providing existing services to you.

A record of any fraud or money laundering risk will be kept 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 above.

If there are other individuals connected to your account application, such as joint account holders or signatories, their information may be used to carry out checks in the same way.

Fraud prevention agencies can keep personal information for different lengths of time. They can keep your data for up to six years if they find a risk of fraud or money laundering.

Some fraud prevention agencies, and similar organisations, may transfer your personal information outside of the UK and EEA. Where they do, there will be a contract in place to make sure that the recipients of that data protect it to the standard required in the UK and EEA. They may also require the recipient to subscribe to 'international frameworks' intended to make data sharing secure.

### **Do we do any monitoring involving processing of your personal information?**

We may conduct short term, carefully controlled monitoring of the activities on your account. This may be necessary for our legitimate interests or to meet our legal obligations, for instance, where we suspect fraud, money laundering or other crimes.

We monitor and record telephone calls and email communications in order to comply with regulatory rules and our own policies and procedures. This is for the purposes of staff training, resolving queries or issues, preventing or detecting fraud or other criminal activity, and to allow us to review and improve the quality of our services.

A written record may be kept of in-person meetings that you may have with members of your local branch staff, to make sure that we have a record of what has been discussed and any instructions that you may give.

We may also get some personal information about you when we use CCTV on our premises. We use CCTV on our premises to ensure the safety and security of our staff and customers.

### **Profiling and other automated decision making**

To help ensure we make analyses and decisions which are accurate, efficient and tailored to you, we may use your information to create a financial profile. We do this to help us assess your creditworthiness, product suitability and to make responsible lending decisions. This may include credit assessments and making credit-related decisions about you, for example whether to offer you credit and setting your credit limits.

We may also use your information to prepare statistical, market analysis and product analysis to be used internally to help us understand whether we are developing the right products and services. When carrying out analysis, we may combine the information we have with information we receive from external organisations.

Additionally, we may use your personal information in processes and profiling activity to carry out fraud and anti-money laundering checks, to verify that you (or your business, if applicable) meets the conditions needed to open the account(s), and to help us assess financial crime risks. This includes the creation of profiles based on your transaction history, which enables us to effectively monitor for fraud and make decisions on approving, preventing or seeking further authorisation for any payments. We do this to improve the payment experience for you, ensuring we protect ourselves and our customers from financial crime risk. If you're a Business Banking customer, we may use the personal information of related individuals (such as directors, shareholders and authorised signatories) in processes and profiling activity to carry out fraud and anti-money laundering checks, to verify that the business meets the conditions needed to open the account(s), and to help us assess financial crime risks.

We do this to meet our legal and regulatory obligations and to protect you, us and others from financial crime.

If you've given your consent for us to identify and send you information about products and services, we may use profiling activity to decide what type of marketing communications to send you. Our profiling activity may include analysis of information you give to us and details about how you use the products and services you have with us. We do this to ensure you receive the most relevant information about products and services at the right time.

If you want to know more about your rights in relation to profiling and automated decision making, see the 'What are your rights under data protection laws' section below.

### **Artificial Intelligence and machine learning**

When processing your personal information, we may use some types of artificial intelligence to support the activities listed in the 'How we use your information' section of this notice. This may include, for example, generative, predictive, and agentic artificial intelligence systems.

This includes things like providing our products and services, assessing and managing financial crime risks, improving the efficiencies of our internal processes (e.g. our onboarding, credit, finance and lending processes), supporting business decisions, and profiling activities as described in the section above.

We may also use your data to train, develop, maintain, validate and analyse the performance of our artificial intelligence models.

## Immigration Act checks

If you are:

- applying for a current account;
- a joint account holder;
- a signatory or beneficiary of a current account;
- or the user of a debit card or online banking service on a current account,

we are legally required under the Immigration Act to screen your full name, address and date of birth against the Home Office disqualified persons list, to confirm if you are lawfully present in the UK. We do this screening as part of the application process and (if the application is successful) on a periodic basis thereafter.

Where a positive match is identified against the Home Office disqualified persons list, we're legally required to report that individual and details of all accounts held by them to the Home Office for further review. Where the Home Office confirms a positive match, it may instruct us not to open the account for a new account application or close the account/s and/or freeze assets for existing account/s. Instructions to close account/s and/or freeze assets may also include accounts which are held or operated jointly and a positive match is made against only one of the account holders or signatories.

## How we process your information to provide additional support

We have a responsibility to treat our customers fairly and to protect your economic wellbeing where life events or your health mean that you need additional support. In such cases we may process your personal data, including special category data if necessary, as it is in the substantial public interest to either protect your economic wellbeing or prevent you from harm. If we collect and process your special category data we'll carefully explain how and why we are doing that in the particular case, and discuss with you to understand what support you may require. When we use information to provide additional support, we may also use any information that we gather regarding your financial circumstances to ensure we make lending decisions that are appropriate to your particular circumstances. The information we collect is held securely with access limited to those who need it to be able to support you.

## How long we keep your personal information for

How long we keep your personal information depends on the products and services you or your employer hold with us.

We'll keep your information for as long as you or your employer are our customer. We may need to keep some of your personal information for up to 15 years from closure of your account. We keep your information in order to:

- comply with our legal and regulatory requirements;
- demonstrate we treated you fairly;
- respond to your needs, queries or complaints;
- respond to potential legal claims.

In cases where you're a prospective customer, you apply for products or services and you're declined, or you withdraw your application before funds are drawn down, we'll normally only keep your data for one year from the point that the relationship is no longer progressing, but this may be longer for some products as required by law.

If you'd like further information about our data retention practices, contact our Data Protection Officer using the details set out above.

## What are your rights under data protection laws?

Here is a list of the rights that all individuals have under data protection laws. They don't apply in all circumstances, if you wish to exercise any of them, we'll explain at that time if they are applicable.

| Your data protection rights                                    | Description                                                                                                                                                                                                                                                                                                                                |
|----------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| The right to be informed                                       | We have to be transparent with you about the processing that we do with your personal information. This is why we have a Privacy Notice. The information that you supply is determined by whether or not we collected your personal information directly from you or indirectly via someone else (such as a broker or other intermediary). |
| The right to have your personal information corrected          | If you believe any of your information is incorrect, wrong or incomplete we'll take steps to check it and correct it. If we've disclosed the personal information in question to other organisations, we must inform them of the rectification where possible.                                                                             |
| The right to object to processing of your personal information | You can object to our use of your personal information where: we rely on legitimate interests (as described above), where it's processed for direct marketing (including profiling relevant to direct marketing) or it's processed for the purposes of statistics.                                                                         |

|                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                     |
|-------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| The right to restrict processing of your personal information                                   | If you believe that your personal information is incorrect or you believe that the way that we're using it is unlawful, you can ask us to stop using it. We will not actively use the data whilst we investigate and validate its accuracy and our lawful use. If we have no reason to keep your information, you can ask us to continue to hold it (but not use it) to exercise your legal claims. |
| The right to have your personal information deleted (also known as the "right to be forgotten") | You can request the deletion of the personal information that we hold about you. We'll do so if we have no legal, regulatory or compelling business reason to keep it.                                                                                                                                                                                                                              |
| The right to request access to your personal information                                        | You can ask us to provide you with a copy of the personal information that we hold about you. This may help you to determine if you can exercise other rights (those mentioned above and below).                                                                                                                                                                                                    |
| The right to port your personal information to another firm                                     | If we hold your personal information electronically and use it with your consent or to fulfil our contractual obligation with you, you can ask us to transfer the data to another organisation in a safe and secure way and in a machine readable format (such as a spreadsheet).                                                                                                                   |
| Rights relating to automated decision making                                                    | If we make an automated (computerised) decision which has a significant impact on you, you can request that a human review the decision.                                                                                                                                                                                                                                                            |

You can contact our Data Protection Officer for more details on all the above. You also have the right to complain to the Information Commissioner's Office which enforces data protection laws: [ico.org.uk](https://ico.org.uk).

### Your marketing preferences and what this means

Where we have consent, we may contact our customers by post, phone, email and other electronic means about products and services which we believe you may be interested in. We won't do this if you haven't given us your consent and you can withdraw your consent at any time at any time by contacting your branch.

### Cookies

We may use cookies and other similar technologies on our website. Cookies are small text files that may be stored on your computer or mobile device when you visit a website. These technologies may do different things, such as letting you navigate between web pages efficiently and remembering your preferences. Our website provides further information on how and where we use cookies and how you can control them.