







## 5 Data Protection Statement (continued)

### Monitoring of communications

Subject to applicable laws, you'll monitor and record my calls, emails, text messages, social media messages and other communications in relation to my dealings with you. You'll do this for regulatory compliance, self-regulatory practices, crime prevention and detection, to protect the security of your communications systems and procedures, to check for obscene or profane content, for quality control and staff training, and when you need to see a record of what's been said. You may also monitor activities on my account where necessary for these reasons and this is justified by your legitimate interests or your legal obligations.

### Using my personal data: the legal basis and purposes

You'll process my personal data:

1. As necessary **to perform your contract with me** for the relevant account, policy or service:
  - a) To take steps at my request prior to entering into it;
  - b) To decide whether to enter into it;
  - c) To manage and perform that contract;
  - d) To update your records; and
  - e) To trace my whereabouts to contact me about my account and recovering debt.
2. As necessary **for your own legitimate interests** or those of other persons and organisations, e.g.:
  - a) For good governance, accounting, and managing and auditing your business operations;
  - b) To search at credit reference agencies if I'm over 18 and apply for credit;
  - c) To monitor emails, calls, other communications, and activities on my account;
  - d) For market research, analysis and developing statistics; and
  - e) To send me marketing communications and for marketing to me in-branch, including automated decision making relating to this.
3. As necessary **to comply with a legal obligation**, e.g.:
  - a) When I exercise my rights under data protection law and make requests;
  - b) For compliance with legal and regulatory requirements and related disclosures;
  - c) For establishment and defence of legal rights;
  - d) For activities relating to the prevention, detection and investigation of crime;
  - e) To verify my identity, make credit, fraud prevention and anti-money laundering checks; and
  - f) To monitor emails, calls, other communications, and activities on my account.
4. Based on **my consent**, e.g.:
  - a) When I request you to disclose my personal data to other people or organisations such as a company handling a claim on my behalf, or otherwise agree to disclosures;
  - b) When you process any special categories of personal data about me at my request (e.g. my racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning my health, sex life or sexual orientation); and
  - c) To send me marketing communications where you've asked for my consent to do so.

I'm free at any time to change my mind and withdraw my consent. The consequence might be that you can't do certain things for me.

### Sharing of my personal data

Subject to applicable data protection law you may share my personal data with:

- The Santander group of companies\* and associated companies in which you have shareholdings;
- Sub-contractors and other persons who help you provide your products and services;
- Companies and other persons providing services to you;
- Your legal and other professional advisors, including your auditors;
- Fraud prevention agencies, credit reference agencies, and debt collection agencies when you open my account and periodically during my account or service management;
- Other organisations who use shared databases for income verification and affordability checks and to manage/collect arrears;
- Government bodies and agencies in the UK and overseas (e.g. HMRC who may in turn share it with relevant overseas tax authorities and with regulators e.g. the Prudential Regulation Authority, the Financial Conduct Authority, the Information Commissioner's Office);
- Courts, to comply with legal requirements, and for the administration of justice;
- In an emergency or to otherwise protect my vital interests;
- To protect the security or integrity of your business operations;
- To other parties connected with my account e.g. guarantors and other people named on the application including joint account holders who will see my transactions;
- When you restructure or sell your business or its assets or have a merger or re-organisation;
- Market research organisations who help to improve your products or services;
- Payment systems (e.g. Visa or Mastercard) if you issue cards linked to my account, who may transfer my personal data to others as necessary to operate my account and for regulatory purposes, to process transactions, resolve disputes and for statistical purposes, including sending my personal data overseas; and
- Anyone else where you have my consent or as required by law.

## 5 Data Protection Statement (continued)

### International transfers

My personal data may be transferred outside the UK and the European Economic Area. While some countries have adequate protections for personal data under applicable laws, in other countries steps will be necessary to ensure appropriate safeguards apply to it. These include imposing contractual obligations of adequacy or requiring the recipient to subscribe or be certified with an 'international framework' of protection. Further details can be found in the 'Using My Personal Data' booklet.

### Identity verification and fraud prevention checks

The personal data you've collected from me at application or at any stage will be shared with fraud prevention agencies who will use it to prevent fraud and money-laundering and to verify my identity. If fraud is detected, I could be refused certain services, finance or employment in future. You may also search and use your internal records for these purposes. Further details on how my personal data will be used by you and these fraud prevention agencies, and my data protection rights, can be found in the 'Using My Personal Data' booklet.

### My marketing preferences and related searches

You'll use my home address, phone numbers, email address and social media (e.g. Facebook, Google and message facilities in other platforms) to contact me according to my preferences. I can change my preferences or unsubscribe at any time by contacting you. In the case of social media messages I can manage my social media preferences via that social media platform. If I'm over 18, you may search the files at credit reference agencies before sending marketing communications or doing marketing in-branch to me about credit. The credit reference agencies don't record this particular search or show it to other lenders and it won't affect my credit rating. You do this as part of your responsible lending obligations which is within your legitimate interests.

From time to time you'd like to contact me about products, services and offers that may interest me or to get my opinion on how you are doing. I understand you won't bombard me and I can choose to stop receiving information at any time by contacting you.

I have ticked any box(es) I **WOULD NOT** like you to use:

- Email, text, social media and messaging services
- Phone
- Post
- Market research, including customer satisfaction surveys
- All of the above**

### Using automated decision making to make decisions about me

You may automatically process my personal information, without human intervention, to evaluate certain personal aspects about me (known as profiling).

In particular, you may analyse or predict (among other things) my economic situation, personal preferences, interests or behaviour. This could mean that automated decisions are made about me using my personal information. For example, you might analyse certain customer demographics, account holdings and account behaviours (such as Direct Debits I have set up on my accounts including those which identify accounts and products such as credit cards and store cards which I hold with other providers/elsewhere) and look at details of transactions relevant to your accounts. You may also analyse events such as the maturity dates of my accounts and opening anniversaries.

In some instances you'll use automated processing and decision making, where relevant, to decide which of your other products or services might be suitable for me, as well as to produce a personalised price for insurance products, to provide an indication of the price prior to an application being made (please note, publicly available information about me and information about me from third party data sources such as credit reference agencies, will also be used to provide me with an indication of the price). The personalised price would be presented to me in marketing communications and during contacts with Santander that might be suitable. You'll look at the types of accounts that I already have with you, as well as my age, where this is relevant to the product you think I might be interested in. You'll also conduct behavioural scoring, including by looking at the accounts and products I already have with you and how they are being used, such as account turnover, arrears and other indications of financial difficulties. Where searches are carried out against publicly available data sources and credit reference agencies, these searches may appear on my credit report, but they will not affect my ability to get credit.

I may have a right to certain information about how you make these decisions. I may also have a right to request human intervention and to challenge the decision.

For some insurance products you may use automated decision making to assist the insurer in determining my final insurance premium. The insurer will use an automated underwriting engine to process my personal information and to better assess insurance risk which will generally provide a more accurate price that is relevant to my individual circumstances and needs. The automated underwriting engine will use information including personal information that I provide as well as other information about me held by you, the insurer and other parties. Where the insurer is carrying out any automated decision making it will do so on the basis that is necessary in order for the insurer to enter into the insurance contract with me. I have the right to contest that decision, express my point of view and ask for a human review. Where you carry out any automated decision making for my insurance product, you will ask for my consent during the application process to allow you to do so. I may withdraw my consent at any time. Further details can be found in the 'Using My Personal Data' booklet.

### Criteria used to determine retention periods (whether or not I become a customer)

The following criteria are used to determine data retention periods for my personal data:

- **Retention in case of queries.** You'll retain my personal data as long as necessary to deal with my queries (e.g. if my application is unsuccessful);
- **Retention in case of claims.** You'll retain my personal data for as long as I might legally bring claims against you; and
- **Retention in accordance with legal and regulatory requirements.** You'll retain my personal data after my account, policy or service has been closed or has otherwise come to an end based on your legal and regulatory requirements.

### My rights under applicable data protection law

My rights are as follows (noting that these rights don't apply in all circumstances):

- The **right to be informed** about your processing of my personal data;
- The right to have my personal data **corrected if it's inaccurate** and to have **incomplete personal data completed**;

- The right **to object** to processing of my personal data;
- The right **to restrict processing** of my personal data;
- The right **to have my personal data erased** (the 'right to be forgotten');
- The right to **request access** to my personal data and information about how you process it;
- The right to **move, copy or transfer my personal data** ('data portability'); and
- Rights in relation to **automated decision making** including profiling.

I have the right to complain to the Information Commissioner's Office. It has enforcement powers and can investigate compliance with data protection law: **ico.org.uk**.

For more details on all the above I can contact your DPO or request the 'Using My Personal Data' booklet by asking for a copy in branch or online at **santander.co.uk**.

#### **Data anonymisation and aggregation**

My personal data may be converted into statistical or aggregated data, which can't be used to identify me. You may share and sell such anonymised data including in an aggregated format, within and outside of the Santander group of companies, for statistical analysis, research and other business purposes. For example, sharing information about general spending trends in the UK to assist in research. The law says this is not considered to be personal information after it has been anonymised and/or aggregated.

#### **Maturing ISA and investment products**

If I have a maturing ISA or an investment product I may be required to provide identification to withdraw funds or transfer them to an alternative account.

#### **\*Group companies**

For more information on the Santander group companies, please see the 'Using My Personal Data' booklet.

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