

# Data Protection Statement

## Introduction

The Data Protection Statement sets out how we'll use your personal data.

Your personal data is data which by itself or with other data available to us can be used to identify you. We are Santander UK plc, the data controller. This data protection statement sets out how we'll use your personal data. You can contact our Data Protection Officer (DPO) at 201 Grafton Gate East, Milton Keynes, MK9 1AN if you have any questions.

When we change this Data Protection Statement in a material way, a notice will be displayed on our website along with the updated privacy policy.

## The types of personal data we collect and use

Whether or not you become a customer or additional cardholder, we'll use your personal data for the reasons set out below and if you become a customer or an additional cardholder we'll use it to manage the account, policy or service you've applied for. We'll collect most of this **directly** during the application journey. The sources of personal data collected **indirectly** are mentioned in this statement. The personal data we use may be about you as a personal or business customer (if you are one) and may include:

- Full name and personal details including contact information (e.g. home and business address and address history, email address, home, business and mobile telephone numbers);
- Date of birth and/or age (e.g. to make sure that you're eligible to apply);
- Financial details (e.g. salary and details of other income, and details of accounts held with other providers);
- Records of products and services you've obtained or applied for, how you use them and the relevant technology used to access or manage them (e.g. mobile phone location data, IP address, MAC address);
- Biometric data (e.g. fingerprints and voice recordings for TouchID and voice recognition);
- Information from credit reference or fraud prevention agencies, electoral roll, court records of debt judgements and bankruptcies and other publicly available sources as well as information on any financial associates you may have;
- Family, lifestyle or social circumstances if relevant to the product or service (e.g. the number of dependants you have);
- Education and employment details/employment status for credit and fraud prevention purposes; and
- Personal data about other named applicants. You must have their authority to provide their personal data to us and share this data protection statement with them beforehand together with details of what you've agreed on their behalf. When applying for a credit card you must have permission to give information about any third party named on the application form.

## Providing your personal data

We'll tell you if providing some personal data is optional, including if we ask for your consent to process it. In all other cases you must provide your personal data so we can process your application (unless you're a customer and we already hold your details).

## Monitoring of communications

Subject to applicable laws, we'll monitor and record your calls, emails, text messages, social media messages and other communications in relation to your dealings with us. We'll do this for regulatory compliance, self-regulatory practices, crime prevention and detection, to protect the security of our communications systems and procedures, to check for obscene or profane content, for quality control and staff training, and when we need to see a record of what's been said. We may also monitor

activities on your account where necessary for these reasons and this is justified by our legitimate interests or our legal obligations.

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

We'll process your personal data:

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

You're free at any time to change your mind and withdraw your consent. The consequence might be that we can't do certain things for you.

## Sharing of your personal data

Subject to applicable data protection law we may share your personal data with:

- The Santander group of companies\* and associated companies in which we have shareholdings;
- Sub-contractors and other persons who help us provide our products and services;

- Companies and other persons providing services to us;
- Our legal and other professional advisers, including our auditors;
- Fraud prevention agencies, credit reference agencies, and debt collection agencies when we open your account and periodically during your 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 your vital interests;
- To protect the security or integrity of our business operations;
- To other parties connected with your account e.g. guarantors and other people named on the application who will see your transactions;
- When we restructure or sell our business or its assets or have a merger or re-organisation;
- Market research organisations who help to improve our products or services;
- Payment systems (e.g. Visa or Mastercard) if we issue cards linked to your account, your account is linked to a card on another current account, or as a result of a transfer to another account you receive a card. The Payment systems may transfer your personal data to others as necessary to operate your account and for regulatory purposes, to process transactions, resolve disputes and for statistical purposes, including sending your personal data overseas; and
- Anyone else where we have your consent or as required by law.

## International transfers

Your 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.

## International Corridors

Where you may have international business needs, we will share information relating to your company, products and accounts, including transactional information, with Banco Santander S.A., Santander group companies and other partner banks who may be based in other countries, to better support the international operations of your company and decide whether to offer your company other products and services. For more information on who those other Santander group companies or other partner banks are, you can contact your Relationship Team or call 0330 123 9860\*\*The data shared will include information on your company's financial position, its auditable accounts, its directors and shareholders and any information held about the company by Santander, such as information about transactions carried out on your accounts with Santander and information regarding any other products and services that you receive from us. We will do this on the basis of our legitimate interests. **If you do not want us to share your data in this manner you can speak to us.** Unless you have agreed otherwise, if we believe you may have international business needs we will check whether you have accounts held with other Santander group companies. If there are products or

services that we or our group of companies or partner banks think may meet your needs we may tell you about these. You can amend your marketing preferences at any time by contacting us.

## Identity verification and fraud prevention checks

The personal data we've collected from you 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 your identity. If fraud is detected, you could be refused certain services, finance or employment in future. We may also search and use our internal records for these purposes. Further details on how your personal data will be used by us and these fraud prevention agencies, and your data protection rights, can be found in the 'Using My Personal Data' booklet.

## Credit reference checks

If you've applied for a credit product then in order to process your application, we'll perform credit and identity checks on you at your home and business address (if you are a business customer) with one or more credit reference agencies. To do this we'll supply your personal data to the credit reference agencies and they'll give us information about you. When we carry out a search at the credit reference agencies they'll place a footprint on your credit file. A credit search may either be: a) a quotation search where a soft footprint is left. This has no effect on your credit score, and lenders are unable to see this; or b) a hard footprint where you've agreed/requested Santander to proceed with your application for credit. This footprint will be viewable by other lenders and may affect your ability to get credit elsewhere. We'll also continue to exchange information about you with credit reference agencies while you have a relationship with us. The credit reference agencies may in turn share your personal information with other organisations. The personal data shared with the credit reference agencies will relate to you and your business (if you are a business customer).

Details about your application (whether or not it's successful) will be recorded and we'll give details of your accounts and how you manage them to credit reference agencies. We will use this personal data to manage your account, including any future increase in your credit limit and card limit, and to determine the interest rate payable and the way interest on the account is charged or calculated if you apply for a credit card. If you do not repay any debt in full or on time, they'll record the outstanding debt and supply this information to others performing similar checks, to trace your whereabouts and to recover debts that you owe. Records remain on file for 6 years after they are closed, whether settled by you or defaulted. A financial association link between joint applicants will be created at the credit reference agencies. This will link your financial records and will be taken into account in all future applications by either or both of you until either of you apply for a notice of disassociation with the credit reference agencies. Very occasionally, if we have insufficient information about you and you apply for a credit card, we may use the information about other members of your family.

If you're a business customer and you're a director, we will seek confirmation from the credit reference agencies that the residential address that you provide is the same as that shown on the restricted register of directors' usual addresses at Companies House.

The identities of the credit reference agencies, and the ways in which they use and share personal information is explained in more detail in the 'Using My Personal Data' booklet, or via the Credit Reference Agency Information Notice (CRAIN) document which can be accessed via any of the following links:

- [experian.co.uk/crain](https://experian.co.uk/crain)
- [equifax.co.uk/crain](https://equifax.co.uk/crain)
- [transunion.co.uk/crain](https://transunion.co.uk/crain)

## Your marketing preferences and related searches

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

If you don't want information on other products and services or to be included in market research, and you haven't told us before, you can let us know by calling us on 0330 678 1783\*\*.

## Using automated decision making to make decisions about you

We may automatically process your personal information, without human intervention, to evaluate certain personal aspects about you (known as profiling).

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

In some instances we'll use automated processing and decision making, where relevant, to decide which of our other products or services might be suitable for you, 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 you and information about you from third party data sources, such as credit reference agencies, will also be used to provide you with an indication of the price). The personalised price would be presented to you in marketing communications and during contacts with Santander that might be suitable. We'll look at the types of accounts that you already have with us, as well as your age, where this is relevant to the product we think you might be interested in. We'll also conduct behavioural scoring, including by looking at the accounts and products you already have with us 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 your credit report, but they will not affect your ability to get credit.

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

For some insurance products we may use automated decision making to assist the insurer in determining your final insurance premium. The insurer will use an automated underwriting engine to process your personal information and to better assess insurance risk which will generally provide a more accurate price that is relevant to your individual circumstances and needs. The automated underwriting engine will use information including personal information that you provide as well as other information about you held by us, 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 you. You have the right to contest

that decision, express your point of view and ask for a human review. Where we carry out any automated decision making for your insurance product, we will ask for your consent during the application process to allow us to do so. You may withdraw your consent at any time. Further details can be found in the 'Using My Personal Data' booklet.

## Other information about you if you are a business customer

We may also hold all the information you give to us (i.e. name, address, date of birth, nationality) in order to undertake periodic due diligence checks which banks are required to undertake to comply with UK legislation.

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

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

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

## Your rights under applicable data protection law

Your rights are as follows:

- The **right to be informed** about our processing of your personal data;
- The right to have your personal data **corrected if it's inaccurate** and to have **incomplete personal data completed**;
- The right **to object** to processing of your personal data;
- The right **to restrict processing** of your personal data;
- The right **to have your personal data erased** (the 'right to be forgotten');
- The right **to request access** to your personal data and information about how we process it;
- The right **to move, copy or transfer your personal data** ('data portability'); and
- Rights in relation to **automated decision making** including profiling.

You 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](http://ico.org.uk).

For more details on all the above you can contact our DPO or request the 'Using My Personal Data' booklet by asking for a copy in branch or online at [santander.co.uk](http://santander.co.uk).

## Data anonymisation and aggregation

Your personal data may be converted into statistical or aggregated data, which can't be used to identify you. We 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.

## \*Group companies

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

\*\*Calls may be recorded or monitored.

