

## YOUR PERSONAL INFORMATION AND WHAT WE DO WITH IT Business Relationships

The meaning of some terms that we use in this privacy notice:

**Process** or **processing** includes everything we do with your personal information from its collection, right through to its destruction or deletion when we no longer need it. This includes for instance collecting it (from you), obtaining it (from other organisations), using, sharing, storing, retaining, deleting, destroying, transferring it overseas.

**Legitimate interests** is mentioned in our privacy notice because data protection laws allow the processing of personal information where the purpose is legitimate and is not outweighed by your interests, fundamental rights and freedoms. Those laws call this the legitimate interests legal ground for personal data processing.

### WHO WE ARE AND HOW TO CONTACT US

Bath Investment and Building Society of 15 Queen Square, Bath BA1 2HN is a data controller of your personal information. This means information that is about you or from which we can identify you. This privacy notice describes how we deal with your personal information. We are the data controller of this information under relevant data protection laws because in the context of our business relationship with you we decide how and why it is processed in the ways explained in this privacy notice. When we use terms such as **we**, **us** and **our** in this notice, we mean Bath Investment and Building Society.

Our Director of Risk Management, Tonia Lovell, can be contacted if you have queries about this privacy notice or wish to exercise any of the rights mentioned in it.

This privacy notice may be updated from time to time. When it is, we may send you an updated copy (depending on whether we are required to do that or not).

### WHAT KINDS OF PERSONAL INFORMATION ABOUT YOU DO WE PROCESS?

Given your business relationship with the Society, we collect only limited personal information about you, including the following:

- Your title, full name, your contact details, including for instance your email address, work and mobile telephone numbers;
- Your work address, correspondence address (if different)

### WHAT IS THE SOURCE OF YOUR PERSONAL INFORMATION?

We will generally collect personal information from you directly.

## WHAT ARE THE LEGAL GROUNDS FOR OUR PROCESSING OF YOUR PERSONAL INFORMATION (INCLUDING WHEN WE SHARE IT WITH OTHERS)?

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

- 1) Processing necessary **to perform our contract with you or for taking steps prior to entering into it.**
- 2) Where we consider that, on balance, it is appropriate for us do so, processing necessary **for the following legitimate interests** which apply to us and in some cases other organisations (who we list below) are:
  - a) To test the performance of our products, services and internal processes;
  - b) To adhere to guidance and best practice under the regimes of governmental and regulatory bodies such as HMRC, the Financial Conduct Authority, the Prudential Regulation Authority, the Ombudsman, the Information Commissioner's Office and under the Financial Services Compensation Scheme;
  - c) For management and audit of our business operations including accounting;
  - d) To carry out monitoring and to keep records (see below);
  - e) To administer our good governance requirements, such as internal reporting and compliance obligations;
  - f) For market research and analysis and developing statistics;
  - g) For marketing communications from BIBS only, and only where we believe the information may be of interest to you. If you do not wish to receive marketing please let us know.
  - h) When we share your personal information with these other people or organisations;
    - Our legal and other professional advisers, auditors and actuaries;
    - Financial institutions and trade associations;
    - Governmental and regulatory bodies such as HMRC, the Financial Conduct Authority, the Prudential Regulation Authority, the Ombudsman, the Information Commissioner's Office and under the Financial Services Compensation Scheme;
    - Other organisations and businesses who provide services to us such as debt recovery agencies, back up and server hosting providers, IT software and maintenance providers, document storage providers and suppliers of other back office functions;
    - Buyers and their professional representatives as part of any restructuring or sale of our business or assets;
- 3) Processing necessary **to comply with our legal obligations:**
  - a) For compliance with laws that apply to us;
  - b) For establishment, defence and enforcement of our legal rights;
  - c) For activities relating to the prevention, detection and investigation of crime;
  - d) To carry out monitoring and to keep records (see below);
  - e) To deal with requests from you to exercise your rights under data protection laws;
  - f) To process information about a crime or offence and proceedings related to that (in practice this will be relevant if we know or suspect fraud); and

- g) When we share your personal information with these other people or organisations:
- Law enforcement agencies and governmental and regulatory bodies such as HMRC, the Financial Conduct Authority, the Prudential Regulation Authority, the Ombudsman, the Information Commissioner's Office and under the Financial Services Compensation Scheme (depending on the circumstances of the sharing); and
  - Courts and to other organisations where that is necessary for the administration of justice, to protect vital interests and to protect the security or integrity of our business operations.
- 4) Processing with your **consent**:
- a) When you request that we share your personal information with someone else and consent to that;
  - b) For direct marketing communications;
  - c) Processing for a **substantial public interest** under laws that apply to us where this helps us to meet our broader social obligations such as processing that we need to do to fulfil our legal obligations and regulatory requirements.

## HOW AND WHEN CAN YOU WITHDRAW YOUR CONSENT?

Much of what we do with your personal information is not based on your consent, instead it is based on other legal grounds. For processing that is based on your consent, you have the right to take back that consent for future processing at any time. You can do this by contacting us using the details above. The consequence might be that we cannot send you some marketing communications.

## IS YOUR PERSONAL INFORMATION TRANSFERRED OUTSIDE THE UK OR THE EEA?

We are based in the UK and do not normally transfer personal information outside the UK, however we may use suppliers who may transfer data to, or store data in, locations both inside and outside the European Economic Area (EEA). Whenever information is sent to locations outside of the UK, we will ensure that there are suitable safeguards to protect it, to the same standards as apply within the UK.

## WHAT SHOULD YOU DO IF YOUR PERSONAL INFORMATION CHANGES?

You should tell us without delay so that we can update our records. You can do this by email (either at [mortgageadmin@bibs.co.uk](mailto:mortgageadmin@bibs.co.uk) or [savings@bibs.co.uk](mailto:savings@bibs.co.uk)) or by writing to our Head Office.

## DO YOU HAVE TO PROVIDE YOUR PERSONAL INFORMATION TO US?

The personal information you have provided to us is limited to only that which we need to maintain our business relationship. This may include contact details, correspondence address and similar information. Without this information we would find it difficult to maintain this business relationship.

## FOR HOW LONG IS YOUR PERSONAL INFORMATION RETAINED BY US?

If for some reason our business relationship comes to an end, we may keep a record of your contact details for future reference.

Any other personal information you have provided us will be kept in line with our data retention practices. If you would like further information about our data retention practices, contact us.

## WHAT ARE YOUR RIGHTS UNDER DATA PROTECTION LAWS?

Here is a list of the rights that all individuals have under data protection laws. They do not apply in all circumstances. If you wish to exercise any of them we will explain at that time whether they apply.

- The **right to be informed** about your processing of your personal information;
- The right to have your personal information **corrected if it is inaccurate** and to have **incomplete personal information completed**;
- The right to **object** to processing of your personal information;
- The right to **restrict processing** of your personal information;
- The right to **have your personal information erased** (the "right to be forgotten");
- The right to **request access** to your personal information and to obtain information about how we process it;
- The right to **move, copy or transfer your personal information** ("data portability");
- Rights in relation to **automated decision making which has a legal effect or otherwise significantly affects you**.

You have the right to complain to the Information Commissioner's Office which enforces data protection laws: <https://ico.org.uk/>.

## YOUR MARKETING PREFERENCES AND WHAT THIS MEANS

We may use your work address, phone number, email address to contact you about matters which may be of interest to you, taking into account our business relationship with you. This means we do this only if we have a legal ground which allows it under data protection laws – see above for what our legal ground for marketing is. You can stop marketing at any time by contacting us at Head Office or by following the instructions on how to do that in the marketing email or other communication.