Bath Building Society
We're different because you are

Privacy Notice

Your personal data – customers

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The meanings of some terms that we use in this privacy notice

When we use terms such as **we**, **us** and **our**, we mean Bath Building Society.

Personal Data	Any information relating to you (the 'data subject') that is either about you or can be used to identify you. Some examples of this include your name, address, and contact information.
Data Controller and **Data Processor**	These terms are used to describe companies or services that may use your data. A Data Controller will be responsible for deciding what processing happens with the data. A Data Processor will not make any decisions about the data, but will process data on instructions given to it by a Data Controller. Bath Building Society will act as both a Data Controller and Processor for your data. We may also share your data with third parties who act as Processors or Controllers, depending on the service they provide.
Process or **Processing**	This means anything that we do with your personal data, from when we first collect it, through to when we destroy or delete it when we no longer need it. This can include collecting it (from you or other organisations), using, sharing, storing, retaining, deleting, destroying, transferring it overseas.
Legitimate Interests	This is one of several lawful bases for processing personal data. Data protection laws allow us to process personal data where the purpose is legitimate and is not outweighed by your interests, fundamental rights or freedoms. We will explain Legitimate Interests and the other lawful bases in more detail below.
Associated Person	We use this term to describe an individual who is connected to an account, but is not an account holder. This can include: ○ Powers of Attorney ○ Executors ○ Guarantors or collateral charge provider

Who we are and how to contact us

Bath Building Society is a provider of savings and mortgage services. Our Head Office is at 15 Queen Square, Bath, BA1 2HN.

As part of your relationship with us, we will act as a Data Controller of your personal data. This means that we decide how and why it is processed, which will be explained in this Privacy Notice.

We may update this Privacy Notice from time to time. We will send you an updated copy upon request, or where we are required to do so.

If you have any questions about this Privacy Notice, or wish to exercise any of your rights (which will be explained later), you can contact our Data Protection Officer at the below details:

You can email us at:	dataprotection@bibs.co.uk
Or write to:	Data Protection Officer Bath Building Society 15 Queen Square Bath BA1 2HN

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

FOR MORTGAGE CUSTOMERS ONLY

Our mortgages are available directly from the Society as well as through brokers or other intermediaries.

When a broker or other intermediary processes your personal data on our behalf, this privacy notice will apply, and you should contact us to exercise your rights under data protection laws.

When a broker or other intermediary processes your personal data as a Data Controller in its own right, its own privacy notice will apply, and you should ask them for a copy if you do not have one.

What kind of personal data do we process?

To process any application made by you and to manage your ongoing relationship with us, we will collect, process and store personal data about you. We will only collect personal data that is relevant, and only keep it for as long as is necessary for our ongoing relationship with you.

Types of personal data that we process may include:

FOR SAVINGS AND MORTGAGE ACCOUNTS	
Personal details	Your title, name, contact details (such as email address, home and mobile telephone numbers).
Addresses	Your current address, correspondence address (where this is different from your home address), address history.
Date of birth / Age	To verify your identity and to make sure that you are eligible to apply for the product and/or that it is suitable for you.
Contact	Records of how you have contacted us. If you get in touch with us online, this may include details such as your mobile phone location data, IP address and MAC address.
Tax details	We will share information with HMRC to help prevent tax evasion and to comply with our legal obligations.

Electronic Identification Verification	We will use electronic identification verification services to perform checks on you to confirm your identity when you apply for an account, or in certain circumstances while your account is active. These third parties may get their data from a variety of sources, and can act as Credit Reference Agencies or Financial Crime Prevention Agencies.
Residency / Citizenship	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.
Health / Vulnerability	This may include some special categories of personal data, such as about your health or circumstances, which may identify you as a vulnerable (or potentially vulnerable) customer.
Other account details	Details of accounts held with other providers, if you make payments to or from your Bath Building Society savings account from those other accounts, or where you pay your Bath Building Society mortgage from those accounts.
Your role as an associated person	We will collect the following depending on your associated role: ○ We will collect details regarding your role as Power of Attorney or an Executor (where relevant). ○ If you are providing a collateral charge for a mortgage, we will obtain details of your property, including a valuation. If you are providing cash collateral, we will have details of the account where we are holding the money. ○ If you are a guarantor for a mortgage, we will request financial information to support your ability to act as a guarantor.

SAVINGS ONLY	
Transaction details	Where a person other than the savings account holder makes a withdrawal from the account, we will collect information about that person and the transaction.
Business/Charity Details	For non-personal accounts, details of your role in the business/charity and, if applicable, your shareholding in that business.
Signatories/Trustees	If you are a signatory or trustee on an account, we will perform checks to confirm your identity.

MORTGAGES ONLY	
Marital status / family	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).

Occupier status	Information about your occupier status, such as whether you are a tenant, live with parents or are an owner occupier of the property in which you live at the time of your application.
Employment	Information about your employment status including whether you are employed, self-employed, retired or receive benefits.
Financial Details	Your income and expenditure, details of your savings, and details of bank accounts and mortgages held with other providers.
Existing credit	Details about your existing borrowings and loans.
Credit History (from Credit Reference Agencies)	Personal data about your credit history which we obtain from Credit Reference Agencies (CRA). This can include data from: ○ Royal Mail (UK postal addresses) ○ Local authorities (electoral roll) ○ The Insolvency Service ○ Companies' House ○ Other lenders and providers of credit (who supply data to the CRAs) Court judgments decrees and administration orders made publicly available through statutory public registers (see the section on 'Credit Reference Agencies' below)
Other applicants	Where relevant, information about any joint applicant or guarantor which you provide in any application.

Joint Applicants, Guarantors and Powers of Attorney

If you make a joint application (for example, with your spouse, partner, or family member, including Joint Borrower Sole Proprietor), we will also collect their personal data as described in this Privacy Notice.

Where do we get your personal data from?

We will generally collect your personal data from you directly. If you are introduced to us by a broker or other intermediary, they will provide us with the personal data you give them.

In addition, we may obtain personal data about you from other sources such as:

- Electronic identification verification services
- Financial Crime Prevention Agencies
- Credit Reference Agencies
- Publicly available directories and information (e.g. telephone directory, social media, internet, news articles).
- Organisations to assist in prevention and detection of crime, police and law enforcement agencies.

For **mortgage customers**, we may also request information from:

- Your employer
- Landlord
- Other lenders
- HMRC
- DWP
- Debt recovery and/or tracing agents

Some of the personal data obtained from electronic identification verification services, Financial Crime Prevention Agencies and Credit Reference Agencies (CRAs) will have originated from publicly accessible sources. In particular, CRAs draw on court decisions, bankruptcy registers and the electoral register (also known as the electoral roll). We explain more about CRAs below. In some cases, we may also process personal data from the same source as the CRA.

What are the lawful bases for processing personal data?

Data protection laws require us to explain what lawful bases justify our processing of your personal data, including sharing it with other organisations. For some processing more than one lawful basis may be relevant (except where we rely on consent). Here are the lawful bases that are relevant to us:

Performance of contract	Processing necessary to perform our contract with you, or for any processing required to enter it, such as during the application stage. This includes:
	• Administering and managing your and services relating to that, updating your records, tracing your whereabouts to contact you about your account.
	• All stages and activities relevant to managing your account including:
	  ○ Enquiry
	  ○ Application
	  ○ Administration and management of accounts
	For mortgage accounts only
	  ○ Illustrations
	  ○ Requests for transfers of equity
	  ○ Setting up / changing / removing additional borrowers / guarantors

Legitimate interests	Where we consider that it is appropriate, processing necessary for the following legitimate interests which apply to us (and in some cases other organisations) are:
	• Administering and managing your account and services relating to that, tracing your whereabouts to contact you about your account and doing this to recover debt.
	• To test the performance of our products, services and internal processes.
	• 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 Payment Systems Regulator
	  ○ Pay UK
	  ○ the Financial Ombudsman Service
	  ○ the Information Commissioner's Office

- the Financial Services Compensation Scheme

- For management and audit of our business operations, including accounting.

- To carry out searches at electronic identification verification services, Financial Crime Prevention Agencies and Credit Reference Agencies pre-application, at the application stage and in certain circumstances after that. We will ask for your consent to perform these checks where it is required.

  Where you have been introduced to us by a broker or other intermediary, they may do these searches on our behalf.

- To carry out monitoring and to keep records (as explained in the relevant sections below).

- To administer our good governance requirements, such as internal reporting and compliance obligations or administration required for Annual General Meeting (AGM) processes.

- For market research and analysis and developing statistics.

- For direct marketing communications by the Society, 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.

- When we share your personal data with these other people or organisations (where applicable):
  - Joint account holders, joint borrowers, trustees and beneficiaries, and any attorney with legal powers over your affairs.
  - Your guarantor (or if you are the guarantor, with the applicant)
  - The broker or other intermediary who introduced you to us
  - 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 Payment Systems Regulator
    - Pay UK
    - the Financial Ombudsman Service
    - the Information Commissioner's Office
    - the Financial Services Compensation Scheme
  - Tax authorities who are overseas, for instance if you are subject to tax in another jurisdiction, we may share your personal data directly with relevant tax authorities overseas (instead of HMRC)
  - Other organisations and business who provide services to us, such as:
    - debt recovery agencies
    - backup and server hosting providers
    - IT software and maintenance providers
    - document storage providers
    - suppliers of other back-office functions
    - buyers and their professional representatives as part of any restructuring or sale of our business or assets
  - Electronic identification verification services, Financial Crime Prevention Agencies and Credit Reference Agencies (please see below for more detail)

	○ Market research organisations who help us to develop and improve our products and services
Legal obligations	Processing necessary to keep to our legal obligations: • To comply with laws that apply to us. • To establish, defend and enforce our legal rights. • For activities intended to prevent, detect and investigate crime. • To carry out identity checks and checks with Financial Crime Prevention Agencies before, during application and in certain circumstances after that. We will ask for your consent to perform these checks where it is required. Where you have been introduced to us by a broker or other intermediary, they may do these searches on our behalf. • To carry out monitoring and keep records (see below). • To deal with requests from you to exercise your rights under data protection laws. • To process information about a crime or offence and any related proceedings. This will apply in cases where we know of or suspect fraud or financial crime. • Where we share your personal data with these other people or organisations (where applicable): ○ Joint account holders, trustees and beneficiaries, and any attorney with legal power over your affairs ○ Your guarantor (or if you are the guarantor, with the applicant) ○ Joint borrowers ○ Fraud prevention agencies ○ Law enforcement agencies and governmental and regulatory bodies, such as: ▪ HMRC ▪ the Financial Conduct Authority ▪ the Prudential Regulation Authority ▪ the Payment Systems Regulator ▪ Pay UK ▪ the Financial Ombudsman Service ▪ the Information Commissioner's Office ▪ the Financial Services Compensation Scheme (depending on the circumstances of the sharing) ▪ courts and other organisations where necessary for the administration of justice, to protect vital interests and to protect the security or integrity of our business operation
Consent	Processing with your consent: • When you ask that we share your personal data with someone else and give your consent for that.

	• For direct marketing communications. You can contact us to change your preferences at any time. • For some of our processing of special categories of personal data, such as about your health or if you are a vulnerable customer. It will be explained to you when we ask for that explicit consent what the purpose is, and how we will share and use it.
Public Interest	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 of your special categories of personal data, such as if you are a vulnerable customer. • Processing that we need to do to fulfil our legal obligations and regulatory requirements. • When we share your personal data with other people and organisations, if they need to know that you are a vulnerable customer, such as your relatives, social services, your carer, or the person who has power of attorney over your affairs.

How and when you can withdraw your consent?

Much of what we do with your personal data is not based on your consent, instead it is based on other lawful bases (as explained above).

Where processing 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 in the "**Who we are and how to contact us"** section above. This might mean that we cannot send you some marketing communications, or that we cannot consider special categories of personal data such as if you are a vulnerable customer. In circumstances where we do not rely on consent as a lawful basis, we may continue to process your personal data.

FOR MORTGAGE CUSTOMERS ONLY:
If you were introduced to us by a broker or other intermediary, we will tell them that you have withdrawn your consent only if they are our Data Processor (this means an organisation who is processing personal data on our behalf) or if we are required to do when you exercise certain rights under data protection laws. You should make sure to contact them directly to withdraw your consent for what they do with your personal data as a Data Controller in their own right.

Do we share your personal data with third parties?

We will share your personal information with third parties where required to open or maintain your account, where required by law, or where we have another legitimate interest in doing so.

Some examples of third parties that we would expect to share your personal data with are:

For all customers:

- Our system providers and suppliers that allow us to function as a business

- Payment service providers
- Law enforcement and government agencies
- Regulators
- Our legal advisers (in the event of legal dispute or query)

For mortgage customers only:

- Mortgage brokers
- Surveyors
- Solicitors connected with your mortgage or mortgage application

Any third parties that we use are required to have appropriate security measures to protect your personal data in line with our policies. We only permit third parties to process your personal data for specified purposes and as instructed by us. We do not allow third parties to use your personal data for their own purposes unless they are separately permitted to.

Is your personal data transferred outside of the UK?

We are based in the UK and do not normally transfer personal data outside the UK. However, we may use third parties, such as system providers, suppliers or services who may transfer data to, or store data in, locations both inside and outside the UK.

We also share some personal data with Credit Reference Agencies as well as Financial Crime Prevention Agencies who may have operations both inside and outside of the UK. Where we do use providers that send information outside of the UK, they are required to have suitable safeguards in place to protect it.

How do we share your information with Credit Reference Agencies?

To process your application (or depending on your role as an associated person), we will perform identity checks on you with one or more Credit Reference Agencies (CRAs).

For mortgage customers, we will also perform a credit check, which will include information from your credit application and about your financial situation and financial history.

To do either of these checks, we will supply your personal data to CRAs and they will give us information about you. CRAs will supply to us both public (including the electoral register) and shared credit, financial situation and financial history information and financial crime prevention information.

We will use this information to:

For all customers

- Verify the accuracy of the information you have provided to us
- Prevent criminal activity, fraud and money laundering
- Manage your account(s)

For mortgage customers only

- Assess your creditworthiness and whether you can afford to take the product
- Trace and recover debts
- Make sure any offers provided to you are suitable

If you were introduced to us, we may ask your Broker or other intermediary to undertake credit checks for us.

We will continue to exchange information about you with CRAs while you have a relationship with us.

We will also inform the CRAs about your settled accounts. If you borrow and do not repay in full and on time (within the terms of your mortgage contract), CRAs will record the outstanding debt. This information may be supplied to other organisations by CRAs.

When CRAs receive a search from us they will place a search footprint on your credit file that may be seen by other lenders.

If you are making a joint application (or depending on your role as an associated person), or as a mortgage applicant you tell us that you have a spouse, partner or financial associate, we will link your records together and will also receive information about them. You should make sure you discuss this with them before making your application. CRAs will also link your records together and these links will remain on your and their files until such time as you or your partner successfully files for a disassociation with the CRAs to break that link.

For more information see "Data Privacy Notices from other organisations" below.

How do we share your data with Financial Crime Prevention Agencies?

The personal data we collect from you may be shared with Financial Crime Prevention Agencies (which includes Fraud Prevention Agencies and Money Laundering Prevention Agencies) who will use it to prevent fraud, money-laundering, or other financial crime, and also to verify your identity. If fraud, money laundering or other financial crime are detected, you could be refused certain services, finance or employment. **For more information see "Data Privacy Notices from other organisations" below.**

What should you do if your personal data changes?

You should tell us as soon as possible so that we can update our records. You can do this by email to savings@bibs.co.uk or mortgageadmin@bibs.co.uk or by writing to our Head Office.

If you were introduced to us by a broker or other intermediary who is Data Controller in its own right, you should contact them separately. In some cases where you exercise rights against us under data protection laws (see below) we may need to inform the broker or other intermediary, but this will not always be the case.

Do you have to provide your personal data to us?

We are unable to process your application or provide you with a savings or mortgage product without having personal data about you. Your personal data is required before you can enter the relevant contract with us, or it is required during the life of that contract, or by laws that apply to us. We may also be restricted on the services we can offer.

We will also be unable to register you as an associated person if we do not have personal data required to confirm your identity.

If we already hold some of the personal data that we need (such as if you are already have an account with us), we may not need to collect it again.

In cases where providing some personal data is optional, we will make this clear.

Do we do any monitoring involving your personal data?

In this section, "monitoring" means any listening to, recording of, viewing of, intercepting of, or taking and keeping records (as the case may be) of calls, email, text messages, social media messages, in person face-to-face meetings and other communications.

We may monitor where permitted by law and we will do this where the law requires it. In particular, we are required by the Financial Conduct Authority to record certain telephone lines, such as those used for interviews with our mortgage advisers.

Some of our monitoring may be:

- to comply with regulatory requirements or self-regulatory practices or procedures relevant to our business.
- to prevent or detect crime.
- in the interests of protecting the security of our communications systems and procedures.
- to have a record of what we have discussed with you and actions agreed with you.
- to protect you and to provide security for you (such as in relation to financial crime risks on your account).
- for quality control and staff training purposes.

We may conduct short-term, carefully controlled monitoring of your activities on your account where this is necessary for our legitimate interests or to keep to our legal obligations. For instance, where we suspect fraud, money laundering or other crimes.

Telephone calls between us and you in connection with your application and your savings or mortgage product may be recorded to make sure that we have a record of what has been discussed and what your instructions are. We may also record these types of calls for quality control and staff training purposes.

How long do we keep your personal data?

The length of time that we will hold onto your personal data can be different depending on the type of account. Unless we explain to you otherwise, we will hold your personal data for the following periods:

SAVINGS ACCOUNTS	
In case of queries	This is so that we can respond to queries from you, for example, where you may have applied unsuccessfully for an account. We will hold personal data for **1 year**, unless we need to keep it for longer as explained below.
For completed applications	We will keep personal data that is needed for us to comply with any legal or regulatory obligations, even where we may no longer be in contact with you, or that may be required for the period where you may legally bring a claim against us. We will hold this personal data for **6 years after your account is closed.**

MORTGAGE ACCOUNTS	
For applications that do not complete	This is so that we can respond to queries from you, for example, where you may have applied unsuccessfully for an account. This can vary depending on how you applied: ○ Where you did not receive advice from us, we will hold personal data for **12 months.** This includes where you were introduced to us by a broker or intermediary, or if you had no advice at all (execution only). ○ Where you were given advice, but either did not make an application or your application did not complete, we will hold personal data for **3 years.** The retention periods above apply unless we must hold your personal data for longer, as explained below.
For completed mortgages	Where your mortgage application completes, we will hold personal data until the account is closed and then for **12 years after closure.** This is to satisfy our legal and regulatory requirements and for the period in which you may legally bring claims against us (including any information relating to arrears or debt recovery).

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 would like to exercise any of them, please contact as and we will explain if for some reason they are not applicable.

Right to be informed	You can ask about how we collect and use your data, and how long we keep it for.
Right of access	You can ask for a copy of your data, commonly referred to as a Subject Access Request (SAR).
Right to rectification	You can ask us to correct any errors with your data.
Right to erasure	You can request that we delete your data.
Right to restrict processing	You can ask us to limit how we use your data.
Right to data portability	You can ask us to transfer your data.
Right to object	You can ask us to stop processing your data, although in some cases we may continue to do so.
Rights related to automated decision-making, including profiling	You have some protections against automated decision making and profiling. You can request information about the processing that takes place, and ask for human intervention or challenge a decision.

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

If you want to exercise any of these rights with Credit Reference Agencies, Fraud Prevention Agencies, Money Laundering Prevention Services, or a broker or intermediary who is a Data Controller in its own right, you should contact them directly.

Data anonymisation and use of aggregated information

Your personal data may be converted into statistical or aggregated data which cannot be used to re-identify you. It may then be used to produce statistical research and reports. This aggregated data may be shared and used in all the ways described in this privacy notice.

Your marketing preferences and what this means

We may use your home address, phone numbers, email address to contact you according to your marketing preferences. We only do this if we have a lawful basis which allows it under data protection laws – see **"What are the lawful bases for processing personal data"** section. You can stop our marketing at any time by emailing marketing@bibs.co.uk or writing to our Head Office or by following the instructions in the marketing email or other communication.

If you are an associated person, we generally will not send marketing correspondence to you, although there may be some circumstances where this is relevant to you.

Data privacy notices from other organisations

We have mentioned that we share your personal data with Credit Reference Agencies and Financial Crime Prevention Agencies (such as Money Laundering Prevention Services and Fraud Prevention Agencies). Further information and the relevant Privacy Notices are available if you ask.

The identities of the CRAs, their role as Financial Crime Prevention Agencies, the data they hold, the ways in which they use and share personal data, data retention periods and your data protection rights with the CRAs are explained in more detail at https://ico.org.uk/for-the-public/credit/. A Credit Reference Agency Information Notice (CRAIN) is also accessible from each of the three CRAs – following any of these three links will also take you to the same CRAIN document:

TransUnion www.transunion.co.uk/crain

Equifax www.equifax.co.uk/privacy-hub/crain

Experian www.experian.co.uk/crain

For more information on how we share your data with Fraud Prevention Agencies, you can view our Fair Processing Notice, which can be found here: www.bathbuildingsociety.co.uk/privacy-policy