

Customer Privacy Policy

Your personal information
and how we use it.

January 2019

Who we are, how to contact us and our data protection officer

Here you'll find details of what personal information we hold and how we use it.

Leeds Building Society, 105 Albion Street, Leeds, LS1 5AS is a data controller of your Personal Data. Our Data Protection Officer can be contacted by email at dpo@leedsbuildingsociety.co.uk or by writing to Data Protection Officer, Leeds Building Society, 105 Albion Street, Leeds, LS1 5AS.

Reference in this document, to we, us and our means Leeds Building Society.

In this document, we refer to the privacy notices of Fraud Prevention Agencies and Credit Reference Agencies. You can obtain copies of these by visiting www.leedsbuildingsociety.co.uk/security/use-of-personal-information, contacting your local branch or by calling us on 03450 50 50 75. You should read these carefully and contact those organisations if you have questions (their details are in their notices).

We reserve the right to update this Privacy Policy from time to time to keep it up to date. You can obtain a copy of the most recent version by visiting www.leedsbuildingsociety.co.uk/security/use-of-personal-information, contacting your local branch or by calling us on 03450 50 50 75.

Information we collect and hold about you

To enable us to provide you with an account, a product, a service or otherwise introduce you to a third party, we require certain information about you. Most of this will be provided by you when you make your application. This includes:

- Your title, full name, contact details (including, for instance, your email address, home and mobile telephone numbers);
- Your home address and correspondence address (where this is different from your home address) and for mortgage accounts only, your address history;
- Your date of birth, to ensure that you are eligible to apply for the product and/or that it is suitable for you;
- Your nationality (where this is necessary for us to comply with our legal and regulatory requirements);
- Records of how you have contacted us and, if you get in touch with us online, details such as your mobile phone location data, IP address and device attributes, such as MAC address; and
- Where applicable, some special categories of personal data such as information about your health or if you have special circumstances which may require us to tailor how we communicate with you (see below for further information regarding special categories of personal data).

For savings accounts, we will also collect:

- Your national insurance number, where you open an ISA;
- Details of other account(s) held with other providers, as necessary (for example, other current/savings accounts where you may fund your savings account from);
- Information about your tax residency; and
- Where a third party operates your account, including making a withdrawal from your account on your behalf, information about that person.

For mortgage accounts, we will also collect:

- Certain financial information (such as information about your employment status/salary/income, details of your savings and details of your expenditure, including borrowings and loans);
- Details of other account(s) held with other providers, as necessary (for example, other current/savings accounts where you may pay a mortgage from);
- 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;
- 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;
- To assess the suitability of the mortgage product and the loan amount, we will ask you questions about your household and family circumstances and if you have any financial dependents; and
- Where relevant, information about any guarantor which you provide in any application.

As part of your mortgage or savings application process and then your ongoing relationship with us, we will also obtain information from third party and open public sources (as applicable) such as:

- Personal information about your credit history, which we obtain from Credit Reference Agencies including data which originates 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 Credit Reference Agencies);
 - housing associations and landlords;
 - Court Judgments Decrees; and
 - administration orders made publicly available through statutory public registers;(for more information see the section on 'Credit Reference Agencies' below).
- Her Majesty's Revenue and Customs ("HMRC");
- Department for Work and Pensions;
- other banks and building societies you have associations with;
- any representatives you appoint to act on your behalf, for example any mortgage intermediary or solicitor;
- your employer;
- your landlord;
- our representatives or agents, for example debt recovery and/or tracing agents;
- third parties where we act as their representative or agent;
- public directories; and
- the internet, for example news articles, blogs and social media.

If you have been introduced to us by a Mortgage Intermediary

When a mortgage intermediary processes your personal information on our behalf, this Privacy Policy will apply and you should contact us to exercise your rights under data protection laws. When a mortgage intermediary processes your personal information as a data controller in its own right, its own privacy policy will apply and you should ask them for a copy if you do not have one by the time you are introduced to us.

Joint Applicants

If you make a joint application with your spouse, partner, family member or friend, we will also collect the personal information set out above about that person. You must show this Privacy Policy to the other applicant and ensure they understand you will share their personal information with us for the purposes described in this Privacy Policy.

Credit reference agencies ("CRAs")

In order to process your application, we will perform credit and identity checks on you with one or more CRAs.

We may also make periodic searches at CRAs to manage your account with us. To do this, we will 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 supply to us both public (including the electoral register) and shared credit, financial situation and financial history information and fraud prevention information.

We will use this information to:

- Verify your identity and your address;
- 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.

If you are making a joint application, or tell us that you have a financial associate, including your spouse, we will link your records together, so you should make sure you discuss this with them, and share with them this information, before lodging the 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 financial associate successfully files for a disassociation with the CRAs, to break that link.

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

We will continue to exchange information about you and, if applicable, your financial associate with CRAs whilst 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, CRAs will record the outstanding debt. This information may be supplied to other organisations by CRAs.

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 more detail in the separate leaflet titled "Credit Reference Agencies Information Notice". You can obtain a copy by visiting www.leedsbuildingsociety.co.uk/security/use-of-personal-information, contacting your local branch or by calling us on 03450 50 50 75.

Fraud prevention agencies

The personal information we collect from you 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.

Further details of how your information will be used by us and these fraud prevention agencies, and your data protection rights, can be found in the separate leaflet titled "Identification and Fraud Prevention". You can obtain a copy by visiting www.leedsbuildingsociety.co.uk/security/use-of-personal-information, contacting your local branch or by calling us on 03450 50 50 75.

What are the legal grounds for processing your personal information (including when we share it with others)?

Under data protection laws, we can only process your personal data for certain reasons (including when we share it with other organisations). Below, we set out these reasons:

1. Processing is necessary to perform our contract with you (for your mortgage and/or savings account) or for taking steps prior to entering into it (during the application stage) and/or for us to comply with our legal obligations:

- In order to enter into a contract with you and to comply with our legal obligations, we will process your personal information, as set out below:
 - At all stages relevant to opening and managing your account including:
 - updating our records;
 - to carry out monitoring and to keep accurate records; and
 - tracing your whereabouts to contact you about your account;
- For mortgage accounts, this will also include:
 - recovering of any debt;
 - providing you with illustrations;
 - dealing with requests including, product transfers, transfers of equity additional lending or other changes to your mortgage; and
 - setting up/changing or removing guarantors (as applicable).
- For compliance with laws which apply to us;
- To administer our governance requirements such as internal reporting and compliance obligations or statutory administration required for our Annual General Meeting processes;
- For establishment, defence and enforcement of our legal rights;
- For activities relating to the prevention, detection and investigation of crime;
- To carry out identity checks, anti-money laundering checks, and checks with Fraud Prevention Agencies at pre-application, at the application stage, and periodically after that. Where you have been introduced to us by a mortgage intermediary, they may input these searches on our behalf;
- 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);
- To deal with requests from you to exercise your rights under data protection laws;
- Where we carry out profiling and/or automated decision making (see the definitions section for further information regarding profiling and automated decision making);

- Where we share your personal information with:
 - Any guarantor (for mortgage customer only);
 - Joint account holders, trustees and beneficiaries and any person with power of attorney over your affairs (in each case only if relevant to you);
 - Other payment services providers, such as when you ask us to share information about your account with them;
 - Other account holders or individuals when we have to provide your information to them because some money paid to you by them should not be in your account;
 - Third party product providers that we introduce you to (or where we act as their agent), when you ask us to share information about you with them;
 - Any mortgage intermediary who introduced you to us;
 - If you have a mortgage with us, we may share information with other lenders who hold a charge on the property;
 - Our legal and other professional advisers, auditors and actuaries;
 - Our valuers who undertake property valuations on our behalf;
 - Courts and to other organisations where it is necessary for the administration of justice, to protect vital interests and to protect the security or integrity of our business operations; and
- Law enforcement agencies and governmental and regulatory bodies, such as:
 - HMRC including tax authorities who are overseas, for instance, if you are subject to tax in another jurisdiction we may share your personal information directly with relevant tax authorities overseas (instead of via HMRC);
 - the Financial Conduct Authority;
 - the Prudential Regulation Authority;
 - the Financial Ombudsman Service;
 - the Information Commissioner's Office;
 - the Financial Services Compensation Scheme;
 - the Gibraltar Financial Services Commission (for customers who hold accounts in Gibraltar); and
 - the Bank of Spain (for customers who hold accounts in Spain).

2. The UK's data protection laws allow the use of personal data where its processing is legitimate and isn't outweighed by the interests, fundamental rights or freedoms of data subjects. We will use your personal data for the following legitimate interests:

- 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 Financial Ombudsman Service;
 - the Information Commissioner's Office;
 - the Financial Services Compensation Scheme;
 - the Gibraltar Financial Services Commission (for customers who hold accounts in Gibraltar); and
 - the Bank of Spain (for customers who hold accounts in Spain);
- For management and audit of our business operations, including accounting;
- To carry out searches at CRAs at pre-application, at the application stage, and periodically after that;
- To carry out monitoring and to keep records;
- For market research and analysis and developing statistics;
- To send you marketing communications and for marketing to you in branch, including automated decision making relating to this; and
- Where we share your personal information with:
 - 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; and
 - Market research organisations who help us to develop and improve our products and services.

3. There may be certain circumstances, where we need to obtain your consent, such as:

- When you request that we share your personal information with someone else and consent to that;
- For some of our processing of special categories of personal data such as about your health or if you have special circumstances which may require us to tailor how we communicate with you (it will be explained to you when we ask for that explicit consent what purposes, sharing and use it is for); and
- To send you information about our products and/or services or other marketing communications where we've asked for your consent to do so.

4. Processing for a substantial public interest under laws which 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 information about your health or if you have special circumstances which may require us to tailor how we communicate with you; and
- Processing that we need to do to fulfil our legal obligations and regulatory requirements.

How and when can you withdraw your consent?

For processing that is based on your consent, you have the right to withdraw your consent. You can do this by contacting us using the details above. The consequence might be that we cannot send you marketing communications or that we cannot take into account special categories of personal data, such as about your health or if you have special circumstances which may require us to tailor how we communicate with you. If withdrawing your consent, has any other consequences, we will advise you of this at the time you make the request.

Is your personal information transferred outside the UK or the EEA?

We are based in the UK but sometimes your personal information may be transferred outside the UK or the European Economic Area. If it is processed within Europe or other parts of the European Economic Area (EEA) then it is protected by European data protection standards. Some countries outside the EEA do have adequate protection for personal information under laws that apply to us. We will make sure that suitable safeguards are in place before we transfer your personal information to countries outside the EEA which do not have adequate protection under laws that apply to us. Safeguards include contractual obligations imposed on the recipients of your personal information. Those contractual obligations require the recipient to protect your personal information to the standard required in the European Economic Area. Safeguards also include requiring the recipient to subscribe to "international frameworks" intended to enable secure data sharing and where the framework is the means of protection for the personal information.

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:

- writing to us at Customer Services, Leeds Building Society, 105 Albion Street, Leeds, LS1 5AS;
- calling us on 03450 50 50 75;
- visiting your local branch; or
- sending us a secure message where you have registered for online services.

If you were introduced to us by mortgage intermediary, you should inform them separately. In some cases, where you exercise rights against us under data protection laws (see below), we may need to inform the mortgage intermediary, but this will not always be the case.

Do you have to provide your personal information to us?

We are unable to provide you with a mortgage or savings account or to process your application or introduce you to a third party at your request, without having personal information about you. Your personal information is required:

- before you can enter into the relevant contract with us;
- during the life of that contract; and
- it is required by laws that apply to us.

If we already hold some of the personal information that we need, for instance if you are already a customer, we may not need to collect it again when you make your application. In cases where providing personal information is optional, we will make this clear in the application form.

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

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, emails, text messages, social media messages and other communications. We may only monitor where permitted by law and we will do this where the law requires it.

Some of our monitoring may be to comply with regulatory rules, 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 fraud risks on your account) and for quality control and colleague training purposes.

Some of our monitoring may check for obscene or profane content in communications.

We may conduct short term, carefully controlled, monitoring of your activities on your mortgage and/or savings account, where this is necessary for our legitimate interests or to comply with 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, mortgage and/or savings account may be recorded to make sure that we have a record of discussions and what your instructions were. We may also record these types of calls for quality control and colleague training purposes.

Profiling and other automated decision making

This section is relevant where we make decisions about you using only technology, and where none of our colleagues or any other individuals have been involved in the process. For example, payments into your savings account from other providers and triggers and events, such as account opening anniversaries, maturity dates and for a mortgage application decision in principle.

We will also do this to decide what marketing communications are suitable for you, to analyse statistics and assess lending and insurance risks.

We can do this activity based on our legitimate interests (explained in more detail in the section about legal grounds for processing above) only where the profiling and other automated decision making does not have a legal, detrimental or other significant effect on you.

In all other cases, we can do this activity only where it is necessary for entering into or performing the relevant contract, is authorised by laws that apply to us, or is based on your explicit consent. In those cases, you have the right to obtain human intervention to contest the decision (see "rights in relation to automated decision making which has a legal effect or otherwise significantly affects you" below). Profiling for direct marketing can mean there is a separate right to object (see "rights to object" below).

For how long is your personal information retained by us?

We will keep your personal information for as long as you are a customer of ours.

After you stop being a customer, we may keep your data for up to 40 years for the following reasons:

- To respond to any queries or complaints;
- To maintain records according to rules that apply to us; and
- For research and statistical purposes to ensure we continue to make informed lending decisions and understand the performance of our savings products in order to sustain and safeguard the Society for the benefit of all our customers.

We may keep your data for longer than 40 years if we cannot delete it for legal, regulatory or technical reasons. If you would like further information about our data retention practices please contact our Data Protection Officer.

What are your rights under data protection laws?

Here is a list of the rights that all individuals have under data protection laws. These include:

- 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 (please see below for further information);
- 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 also have the right to complain to the Information Commissioner's Office who regulates data protection laws.

You can find further information by visiting www.ico.org.uk or by calling the ICO on 0303 123 1113.

You can request our leaflet "Your Data Protection Rights" which provides more details on your rights above, by visiting www.leedsbuildingsociety.co.uk/security/use-of-personal-information, contacting your local branch or by calling us on 03450 50 50 75.

If you wish to exercise any of these rights against the CRAs, the Fraud Prevention Agencies or a mortgage intermediary (who are data controllers in their own right) you should contact them separately.

How to get a copy of your personal information (Data Subject Access Request)

You can obtain a copy of your personal information held by us, by downloading and completing the Data Access Request Form which can be found at www.leedsbuildingsociety.co.uk/security/use-of-personal-information and returning it to us or by writing to us at Customer Liaison Team, Leeds Building Society, 105 Albion Street, Leeds, LS1 5AS.

We'll deal with your request as quickly as possible, but in no more than 30 calendar days of receiving your request and carrying out appropriate identity verification. If for any reason we can't respond within 30 days we'll let you know.

Data anonymisation and use of aggregated information

Your personal information may be converted into statistical or aggregated data which means it can no longer be used to identify you. It may then be used to produce statistical research and reports.

Definitions

We explain below some of the key terms used in this document.

Automated decision making	means process where we make decisions about you, such as your suitability for a product, using a computer based and automated system without a person being involved in making that decision (at least first time around).
Personal information	means information that is about you or from which we can identify you.
Profiling	means using your personal information to evaluate certain personal aspects about you, such as to analyse or predict aspects concerning your economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.
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	data protection laws allow the Processing of Personal Data where the purpose is legitimate and is not outweighed by your interests, fundamental rights and freedoms.

Let's talk

Pop into your local branch

www.leedsbuildingsociety.co.uk/find-a-branch

Call **03450 50 50 75**

Leeds Building Society is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority and our registration number is 164992. You can check this on the Financial Services Register by visiting the FCA website at: www.fca.org.uk/firms/financial-services-register or by contacting the FCA on 0800 111 6768. Buy to Let mortgages which are for business purposes are exempt from FCA Rules.

Leeds Building Society is a member of the Building Societies Association. The Society is covered by the Financial Ombudsman Service.

We may monitor and/or record your telephone conversations with the Society to ensure consistent service levels and for colleague training purposes. If you are contacting us by email, and not using our secure email facility, please remember not to send any personal, financial or banking information because your information isn't secure.

Large text, Braille and audio tape versions of our brochures are available on request.

Head Office: 105 Albion Street, Leeds LS1 5AS.