

SAVINGS PRIVACY NOTICE

YOUR PERSONAL INFORMATION
AND WHAT WE DO WITH IT

THE MEANING OF SOME TERMS THAT WE USE IN THIS PRIVACY NOTICE

Automated decision making means a 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).

Profiling means any form of automated processing of 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 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.

CONTENTS

	PAGE
Who we are and how to contact us	4
What kinds of personal information about you do we process?	4
Joint applicants and Powers of Attorney	5
What is the source of your personal information?	5
What are the legal grounds for our processing of your personal information (including when we share it with others)?	5-7
How and when can you withdraw your consent?	7
Is your personal information transferred outside the UK or the EEA?	8
How do we share your information with Credit Reference Agencies?	8
What should you do if your personal information changes?	8
Do you have to provide your personal information to us?	9
Do we do any monitoring involving processing of your personal information?	9
For how long is your personal information retained by us?	9
What are your rights under data protection laws?	10-11
Data anonymisation and use of aggregated information	11
Your marketing preferences and what this means	11
Data privacy notices from other organisations	11
Who is in our Group	11

WHO WE ARE AND HOW TO CONTACT US

Manchester Building Society of 125 Portland Street, Manchester M1 4QD 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 Manchester Building Society.

Our Data Protection Officer can be contacted at any time including if you have queries about this privacy notice or wish to exercise any of the rights mentioned in it. The contact details are:

Post: Data Protection Officer
Manchester Building Society
125 Portland Street
Manchester
M1 4QD

Telephone: 0161 923 8000

You will see at the end of this privacy notice that we mention the privacy notice of Credit Reference Agencies. We do need to share this with you. Please read it carefully and contact those organisations if you have questions (their details are in their notices).

This privacy notice may be updated from time to time. This means we may send you an updated copy (depending on whether we are required to do that or not). An up to date version will be made available via our website, www.themanchester.co.uk.

WHAT KINDS OF PERSONAL INFORMATION ABOUT YOU DO WE PROCESS?

This will depend on the products or services you apply for and (if your application is successful) obtain from us.

For a savings product, this includes:

- Your title, full name, your contact details, including for instance your email address, home and mobile telephone numbers;
- Your home address, correspondence address (where different from your home address) and address history;
- Your date of birth and/or age, e.g. to make sure that you are eligible to apply for the product and/or that it is suitable for you;
- Your nationality, if 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 IP address and MAC address;
- Some special categories of personal data such as about your health or if you are a vulnerable customer;
- Your financial details e.g. details of account(s) held with other providers if you pay into your savings product from those other account(s);
- Your National Insurance number, if you have been issued with one and if you are opening a Cash ISA; and
- Information about your tax position.

JOINT APPLICANTS AND POWERS OF ATTORNEY

If you make a joint application, we will also collect personal information about the joint applicant(s). If you make an application with somebody who has authority over your affairs, such as a power of attorney, we will also collect personal information about that person.

You must show this privacy notice to any other parties to the account and ensure they confirm that they know you will share their information with us for the purposes described in it.

In our "What are the legal grounds" section you will see a reference to consent and a description of some limited scenarios where it may be relevant to what we do with personal information. If we ask to obtain consent in respect of a joint account (such as for marketing), the consent will be treated as being separate for each applicant.

WHAT IS THE SOURCE OF YOUR PERSONAL INFORMATION?

We will generally collect your personal information from you directly.

In addition, we obtain your personal information from other sources such as Credit Reference Agencies, HMRC, DWP, publically available directories and information (e.g. telephone directory, social media, internet, news articles), other organisations to assist in prevention and detection of crime, police and law enforcement agencies. In addition, some of your personal information may come from other members of our Group if you already have a product with them.

Some of the personal information obtained from Credit Reference Agencies will have originated from publicly accessible sources. In particular, Credit Reference Agencies draw on court decisions, bankruptcy registers and the electoral register (also known as the electoral roll). We explain more about Credit Reference Agencies later in this privacy notice.

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 a consent).

Here are the legal grounds that are relevant to us:

- 1 Processing necessary **to perform our contract with you for the savings product or for taking steps prior to entering into it during the application stage:**
 - a) Administering and managing your savings account and services relating to that, updating your records, tracing your whereabouts to contact you about your account;
 - b) Sharing your personal information with other payment services providers such as when you ask us to share information about your account with them;
 - c) All stages and activities relevant to managing your savings account including enquiry, application, administration and management of accounts; and
 - d) For some of our profiling and other automated decision making. For instance, we will issue communications to groups of customers based on events such as account opening anniversaries and maturity dates.

Continued...

- 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) Administering and managing your savings account and services relating to that, updating your records, tracing your whereabouts to contact you about your account;
 - b) To test the performance of our products, services and internal processes;
 - c) 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;
 - d) For management and audit of our business operations including accounting;
 - e) To carry out searches with Credit Reference Agencies at the application stage, and periodically after that;
 - f) To carry out monitoring and to keep records (see our section on monitoring);
 - g) To administer our good governance requirements and those of other members of our Group, such as internal reporting and compliance obligations or administration required for AGM processes;
 - h) For market research and analysis and developing statistics;
 - i) For some of our profiling and other automated decision making, in particular where this does not have a legal effect or otherwise significantly affect you. For instance, we may decide what direct marketing communications are suitable for you based on your savings account type and balance. Other communications may be issued based on triggers such as transactions on your savings account; and
 - j) When we share your personal information with these other people or organisations:
 - Joint account holders, trustees and beneficiaries and any person with power of attorney over your affairs (in each case only if relevant to you);
 - Members of our Group;
 - Our authorised agents (only relevant to you if you open or operate your account at their office);
 - 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;
 - 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 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
 - Credit Reference Agencies (see our section on Credit References Agencies where we explain more).
- 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 or those of any other member of our Group;
 - c) For activities relating to the prevention, detection and investigation of crime;
 - d) To carry out identity checks and anti-money laundering checks at the application stage, and periodically after that.
 - e) To carry out monitoring and to keep records (see our section on monitoring);
 - f) To deal with requests from you to exercise your rights under data protection laws;
 - g) 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

- h) When we share your personal information with these other people or organisations:
 - Joint account holders, Trustees and beneficiaries, and the person with power of attorney over your affairs;
 - 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;
 - 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 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.

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) For some of our processing of special categories of personal data such as about your health or if you are a vulnerable customer (and it will be explained to you when we ask for that explicit consent what purposes, sharing and use it is for.)

5 Processing for a **substantial public interest** under laws that apply to us where this helps us to meet our broader social obligations such as:

- a) Processing of your special categories of personal data such as about your health or if you are a vulnerable customer.
- b) Processing that we need to do to fulfil our legal obligations and regulatory requirements.
- c) When we share your personal information with other people and organisations such as members of our Group if they need to know that you are a vulnerable customer and your relatives, social services, your carer, the person who has power of attorney over your affairs.

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.

If you have provided your consent to us for processing in relation to your savings account, you can withdraw this at any time by contacting our Savings department:

Post: Savings
Manchester Building Society
125 Portland Street
Manchester
M1 4QD

Telephone: 0161 923 8065

The consequence of withdrawing consent might be that we cannot send you some marketing communications or that we cannot take into account special categories of personal data such as about your health or if you are a vulnerable customer (but these outcomes will be relevant only in cases where we rely on explicit consent for this).

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 within the European Economic Area (EEA) where some of our third party service providers may operate part of their business. If it is processed within Europe or other parts of the EEA then it is protected by European data protection standards.

We do not transfer personal information outside of the EEA in respect of savings accounts. If we were to do so in future, for example through appointing a new service provider that uses a server based outside of the EEA to store information, this section of the privacy notice will be updated. We would need to make sure that suitable safeguards are in place. These include contractual obligations imposed on the recipients of your personal information to protect your personal information to the standard required in the EEA and/or 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.

HOW DO WE SHARE YOUR INFORMATION WITH CREDIT REFERENCE AGENCIES?

In order to process your application, we will perform identity checks on you with one or more credit reference agencies ("CRAs"). 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 and financial history. CRAs will supply to us both public (including the electoral register) and shared credit and financial history information and fraud prevention information.

We will use this information to:

- Verify the accuracy of the data you have provided to us; and
- Prevent criminal activity, fraud and money laundering.

We will continue to exchange information about you with CRAs and routinely perform identity checks while you have a relationship with us.

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

The identities of the CRAs, their role also 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 which we refer to later on in this privacy notice.

WHAT SHOULD YOU DO IF YOUR PERSONAL INFORMATION CHANGES?

You should tell us without delay so that we can update our records.

The contact details for this purpose in relation to a savings account are:

Post: Savings
Manchester Building Society
125 Portland Street
Manchester
M1 4QD

DO YOU HAVE TO PROVIDE YOUR PERSONAL INFORMATION TO US?

We are unable to provide you with the savings product or to process your application 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 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 some personal information is optional, we will make this clear. For instance, we will say if alternative contact details (such as work) can be left blank.

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, email, 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, where we are required by the Financial Conduct Authority's regulatory regime to record certain telephone lines or in person meetings (as relevant) we will do so.

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 staff 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 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 and/or in person meetings between us and you in connection with your application and the savings 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 the quality control and staff training purposes.

FOR HOW LONG IS YOUR PERSONAL INFORMATION RETAINED BY US?

Unless we explain otherwise to you, we will hold your personal information for the following periods:

- **Retention in case of queries.** We will retain the personal information that we need to keep in case of queries from you (for instance, if you apply unsuccessfully for a product or service) for 6 months unless we have to keep it for a longer period (see directly below); and
- **Retention in accordance with legal and regulatory requirements.** We will retain the personal information that we need to keep even after the relevant contract you have with us has come to an end for 7 years and this will be to satisfy our legal and regulatory requirements.

If you would like further information about our data retention practices, 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. They do not apply in all circumstances. If you wish to exercise any of them we will explain at that time if they are engaged or not. The right of data portability is only relevant from May 2018.

The **right to be informed** – we have to be transparent with you about the processing that we do with your personal information. This is why we have a privacy notice. Your right to be informed may be relevant if you consider it necessary to ask for more information about what we do with your personal information.

The right to have your personal information **corrected if it is inaccurate** and to have **incomplete personal information completed** in certain circumstances. If we have disclosed the personal information in question to other organisations, we must inform them of the rectification where possible. Your rights in relation to rectification may be relevant if you consider that we are processing inaccurate or incomplete information about you.

The right to **object** to processing of your personal information where it is based on legitimate interests, where it is processed for direct marketing (including profiling relevant to direct marketing) or where it is processed for the purposes of statistics. There is an important difference between the right to object to profiling relevant to direct marketing in cases where that profiling activity does not have a legal effect on you or otherwise significantly affect you, and the separate right which exists under data protection laws in relation to profiling including automated decision making which has a legal effect or can otherwise significantly affect you (see later in this section).

The right to **restrict processing** of your personal information, for instance where you contest it as being inaccurate (until the accuracy is verified); where you have objected to the processing (where it was necessary for legitimate interests) and we are considering whether our organisation's legitimate interests override your own; where you consider that the processing is unlawful (and where this the case) and where you oppose erasure and request restriction instead; or where we no longer need the personal information for the purposes of the processing for which we were holding it but where you require us to continue to hold it for the establishment, exercise or defence of legal claims.

The right to **have your personal information erased** (also known as the "right to be forgotten"). This enables an individual to request the deletion or removal of personal information where there is no compelling reason for its continued processing. This right is not absolute – it applies only in particular circumstances and where it does not apply any request for erasure will be rejected. It may be relevant where the personal information is no longer necessary in relation to the purpose for which it was originally collected/processed; if the processing is based on consent which you then withdraw; when you object to the processing and there is no overriding legitimate interest for continuing it; if the personal information is unlawfully processed; or if the personal information has to be erased to comply with a legal obligation. Requests for erasure may be refused in some circumstances such as where the personal information has to be retained to comply with a legal obligation or to exercise or defend legal claims.

The right to **request access** to the personal information held about you, to obtain confirmation that it is being processed, and to obtain certain prescribed information about how we process it. This may assist if you wish to find out what personal information we do have about you in order to then determine if you can exercise the other rights mentioned in this section.

The right to **data portability**. This allows individuals to obtain and reuse their personal information for their own purposes across different services; to move, copy or transfer their personal information easily from one environment to another in a safe and secure way without hindrance to usability. This right can only be relevant where personal information is being processed based on a consent or for performance of a contract and is carried out by automated means. This right is different from the right of access (see earlier in this section) and the types of information you can obtain under the two separate rights may be different. You are not able to obtain through the data portability right all of the personal information that you can obtain through the right of access.

Rights in relation to **automated decision making which has a legal effect or otherwise significantly affects you**. This right allows individuals in certain circumstances to access certain safeguards against the risk that a potentially damaging decision is taken solely without human intervention. This right is different from the more general right to object to profiling (see earlier in this section) because that other right is not tied to a scenario where there is a legal effect on you or where the processing otherwise significantly affects you. Data protection laws prohibit this particular type of automated decision making except where it is necessary for entering into or performing a contract; is authorised by law; or where you have explicitly consented to it. In those cases, you have the right to obtain human intervention and an explanation of the decision and you may be able to challenge that decision.

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

If you wish to exercise any of these rights against the Credit Reference Agencies who are data controllers in their own right, you should contact them separately.

DATA ANONYMISATION AND USE OF AGGREGATED INFORMATION

Your personal information 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 and email address to contact you according to your marketing preferences. This means we do this only if we have your consent under data protection laws.

You can stop our marketing at any time by writing to us at Savings, Manchester Building Society, 125 Portland Street, Manchester M1 4QD, by telephone on 0161 923 8065 or by following the instructions on how to do that in the marketing email or other communication.

DATA PRIVACY NOTICES FROM OTHER ORGANISATIONS

We have mentioned that we share your personal information with Credit Reference Agencies. They require us to pass on to you information about how they will use your personal information to perform their services or functions as data controllers in their own right. Their notice is a separate leaflet to our own and will be made available when you apply to open an account, via our website, www.themanchester.co.uk or on request by contacting us.

WHO IS IN OUR GROUP

As at the date of this privacy notice, the members of our Group are: Manchester Building Society, MBS (Mortgages) Limited and MBS (Property) Limited.



Manchester Building Society, Savings, 125 Portland Street, Manchester M1 4QD
Tel: 0161 923 8065 Fax: 0161 923 8950 Email: savings@themanchester.co.uk

Manchester Building Society is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority. Our Financial Services Register number is 206048. Head office: 125 Portland Street, Manchester M1 4QD.
Member of the Building Societies Association, UK Finance and covered by the Financial Services Compensation Scheme.
Registered in the Mutuals Public Register, Register number 356 B.
Manchester Building Society record and monitor telephone calls for training, quality control and regulatory purposes.

www.themanchester.co.uk