

# Using your personal information

## How we use your personal information

Please read this privacy notice to understand how we use and protect the information you provide to us. Your information will be held by The Co-operative Bank p.l.c., also trading as smile, Britannia and Platform (and known as “the Bank”).

## Data protection law and how it protects you

Data protection law requires us to manage all personal information in accordance with the data protection principles. In particular, we are required to process your personal information fairly and lawfully. This means you are entitled to know how we intend to use any information you provide. You can then choose whether you want to give it to us so we can provide the product or service you require. All our employees are responsible for maintaining customer confidentiality. We provide training and education to all employees to remind them about their obligations. In addition, our policies and procedures are regularly audited and reviewed.

### 1. Where we obtain the information

Your personal information will be held securely by the Bank so we can (either now or in the future) manage your relationship with us. This will include information you provide when you apply to us, and any additional information provided by you or others in various ways, including:

- 1.1. In applications, emails, letters and during telephone calls, when registering for services, in customer surveys, when you participate in competitions and promotions, through our website and during financial reviews and interviews.
- 1.2. From analysis (for example, the amount, frequency, location, origin and recipient) of your payments and other transactions, from your use of our services and what we know from operating your account.
- 1.3. Information we receive from our business partners and from other organisations such as credit reference agencies and fraud prevention agencies.

- 1.4. Through your use of different technologies when accessing information about your accounts with us (such as IP addresses, IMEI numbers, web browsers, biometric data and computer operating systems).

We will not retain your personal information for longer than is necessary for the maintenance of your account, or for legal or regulatory requirements. The Bank retains personal data relating to accounts for a maximum of seven years to meet our legal requirements, though for certain product related documentation retention periods vary. If you have any questions relating to the retention periods applied to your data please contact the Data Protection Officer at the following email address **[data.protection@co-operativebank.co.uk](mailto:data.protection@co-operativebank.co.uk)**

The Bank may occasionally collect and hold personal information which is highly sensitive in nature, under data protection law this is known as special categories of data.

This is usually only related to health matters which you bring to our attention to help us understand how best we can support you in the management of your account(s).

If you give us personal information about someone else (such as a joint applicant) then you should not do so without their permission and you must ensure they are made aware of the content of this notice.

Where information is provided by you about someone else, or someone else discloses information about you, it will be added to any personal information which is already held by us and it will be used in the ways described in this privacy notice.

## 2. The personal information we collect and process

The Bank will only gather and process the relevant type and amount of personal information required, allowing us to help you open and then manage your accounts with us. The categories of personal information that we collect (or create on your behalf) are:

Category	Some examples of the information in this category
<b>Name data</b>	<ul style="list-style-type: none"> <li>Title</li> <li>Surname*</li> <li>Forename*</li> <li>Previous surname*</li> </ul>
<b>Personal data</b>	<ul style="list-style-type: none"> <li>Date of Birth*</li> <li>National Insurance Number*</li> <li>Gender</li> </ul>
<b>Residence data</b>	<ul style="list-style-type: none"> <li>Residential address*</li> <li>Tax residency*</li> <li>Previous residential address</li> </ul>
<b>Contact data</b>	<ul style="list-style-type: none"> <li>Home telephone number</li> <li>Mobile telephone number</li> <li>Correspondence addresses</li> </ul>
<b>Employment data</b> (only used at account opening stage)	<ul style="list-style-type: none"> <li>Employment status</li> <li>Employer's address</li> <li>Salary details</li> </ul>
<b>Account level data</b> (created to allow an account to operate)	<ul style="list-style-type: none"> <li>Account number</li> <li>Mortgage reference number</li> </ul>
<b>Digital data</b>	<ul style="list-style-type: none"> <li>IP address</li> <li>Biometric Data</li> </ul>
<b>Security data</b>	<ul style="list-style-type: none"> <li>Telephone Banking passwords/codes</li> </ul>

\*Certain data items we collect throughout the lifecycle of an account are mandatory to allow us to meet our regulatory requirements, and will be shared with government bodies and for fraud prevention activities as described within this notice. While the list above is not exhaustive those marked with an asterisk are mandatory.

## 3. How we use your information

We will use the personal information we hold about you for the following administrative activities:

How we use your information	The basis on which we use your information
<ul style="list-style-type: none"> <li>To develop our products and services</li> <li>To manage our product delivery</li> <li>To perform marketing and sales</li> <li>To manage your applications</li> <li>Assessing lending and insurance risks</li> <li>Customer modelling and statistical trend analysis with the aim of developing and improving products and services</li> </ul>	<ul style="list-style-type: none"> <li>Fulfilling contracts</li> <li>Our legitimate interests</li> <li>Our legal obligation</li> <li>Your consent</li> </ul>
<ul style="list-style-type: none"> <li>Managing your relationship with us</li> <li>Updating, consolidation and improving the accuracy of our records</li> <li>Arrears and debt recovery activities</li> <li>Undertaking transactional analysis</li> <li>Process payments</li> </ul>	<ul style="list-style-type: none"> <li>Fulfilling contracts</li> <li>Our legitimate interests</li> <li>Our legal obligation</li> </ul>
<ul style="list-style-type: none"> <li>Crime detection, prevention and prosecutions</li> <li>Fraud prevention and investigation</li> <li>Anonymising and aggregating personal information for security reasons</li> </ul>	<ul style="list-style-type: none"> <li>Our legitimate interests</li> <li>Our legal obligation</li> </ul>
<ul style="list-style-type: none"> <li>Testing new systems and checking upgrades to existing systems</li> </ul>	<ul style="list-style-type: none"> <li>Our legitimate interests</li> </ul>
<ul style="list-style-type: none"> <li>Profiling for marketing purposes</li> <li>Evaluating the effectiveness of marketing and for market research and training</li> <li>Administering offers, competitions and promotions</li> </ul>	<ul style="list-style-type: none"> <li>Your consent</li> <li>Our legitimate interests</li> </ul>

By processing this information it enables us to better understand your needs and operate your accounts in the efficient way you expect.

Your information will also be used for other purposes for which you give your specific permission, or, in very limited circumstances, when required by law.

#### **4. When we will share your information**

We will treat your personal information as private and confidential but will disclose it outside the Bank if:

- 4.1. Allowed by this agreement;
- 4.2. You consent;
- 4.3. Needed by our agents, advisers or others involved in running accounts and services for you or collecting what you owe us;
- 4.4. Needed by sub-contractors to help us manage your records;
- 4.5. HM Revenue & Customs or other authorities require it;
- 4.6. The law, regulatory bodies or the public interest permits or requires it;
- 4.7. Required by us or others to investigate or prevent crime;
- 4.8. Needed by market research companies to assist us in providing better products and services to you;
- 4.9. Needed by any other parties connected with your account (including guarantors, power of attorney representatives);
- 4.10. Needed by organisations who provide us with a service, on the understanding they keep your information secure and confidential, unless you tell us not to;
- 4.11. Required as part of our duty to protect your accounts, for example we are required to disclose your information to the UK Financial Services Compensation Scheme (FSCS).

We will always ensure your information remains safe and secure. Please go to [co-operativebank.co.uk/global/third-parties](https://co-operativebank.co.uk/global/third-parties) to see our supplier register.

#### **5. Using your information to help prevent terrorism and crime**

The government also requires us to screen applications which are made to us, to ensure we are complying with the international fight against terrorism and other criminal activities. As a result of this, we will need to disclose information to government bodies.

#### **6. Sharing your information to assist with asset buying and selling**

We may in the future wish to sell, transfer or merge part or all of our business or assets, or any associated rights or interests, or to acquire a business or enter into a merger. If so, we will disclose your personal information to a potential buyer, transferee, or merger partner or seller and their advisers, so long as they agree to keep the information confidential and to use it only to consider the possible transaction. If the transaction goes ahead, the buyers, transferee or merger partner will use or disclose your personal information in the same way as set out in this notice.

#### **7. Sharing your personal information between first and second charge lenders**

If you have a secured loan or mortgage with us, we will need to share information with other lenders who also hold a charge on your property. Please go to [co-operativebank.co.uk/global/third-parties](https://co-operativebank.co.uk/global/third-parties) to see our supplier register.

#### **8. Sharing information between joint applicants**

When you open a joint account or product, this will mean your personal information will be shared with the other applicant. For example, transactions made by you will be seen by your joint account holder and vice-versa.

#### **9. How we share your personal information with and use credit reference agencies**

Credit Reference Agencies (CRAs) collect and maintain information about consumers' and businesses' credit behaviour. This includes Electoral Register, fraud prevention, and credit information – including details of previous applications and the conduct of your accounts – and public information such as County Court Judgments, Decrees and Bankruptcies.

The information we and other organisations provide to CRAs about you, your financial associates and your business (if you have one) will be provided to other organisations and used by them and us to:

- 9.1. Help make decisions, for example when:
  - 9.1.1. Checking details on applications for credit and credit-related or other facilities;
  - 9.1.2. Managing credit and credit-related accounts or facilities;
  - 9.1.3. Recovering debt;
  - 9.1.4. Checking details on proposals and claims for all types of insurance;
- 9.2. Detect and prevent crime, fraud and money laundering;
- 9.3. Check your credit history;

- 9.4. Verify your identity if you, or someone is financially linked with you, applies for services;
- 9.5. Trace your whereabouts, and
- 9.6. Undertake research, statistical analysis and systems testing.

If we need to make a credit decision when you apply for a service e.g. mortgage, personal loan, credit card or current account, or to review the amount of credit we provide under an existing agreement, such as an overdraft, your records will be searched along with those of anyone who is financially associated with you, such as your spouse or partner.

The CRA will keep a record of this search and place a "footprint" on your credit file, whether or not the application proceeds.

When we receive an application from a business, we will perform a search with a CRA on the individual company directors or partners and any associated guarantors.

We will also provide details of your account and how you conduct it to CRAs, including if you borrow money, and do not repay the agreed amount of money in full and on time back to the Bank. If you fall behind with your agreed payments and a full payment or satisfactory proposal is not received within 28 days of a formal demand being issued, then a default notice will be recorded with the CRAs.

Similar information will also be given about your other lending/credit relationships with us. Any records shared with CRAs will remain on file for six years after your account is closed, whether it has been settled by you or as a result of a default. Other organisations will see these searches and updates if you apply for credit in the future, and may affect your ability to borrow from other lenders.

If you apply for or hold an account in joint names, or tell us you have a spouse or financial associate, a financial association will be created between your records, including any previous and subsequent names used by you.

This means your financial affairs may be treated as affecting each other. These links will remain on your files until such a time as you or your partner is successful in applying for a disassociation with the CRAs to break the link. You must ensure you have their agreement to disclose information about them. Searches will be made on all joint applicants, and search footprints will be left on all applicants' records.

You have a right to apply to the CRAs for a copy of your file. We carry out most of our credit searches using Experian, but details of how you manage your account(s) will be disclosed to all CRAs. The information they hold may not be the same and there is a small fee you will need to pay to each agency you apply to.

You can find out more about the CRAs and the Credit Reference Agency Privacy Notice (CRAIN) on the websites below. The CRAIN includes details about:

- Who the credit reference agencies are.
- Their role as fraud prevention agencies.
- The data they hold.
- How they use this data.
- How they share personal information.
- How long they can keep data.
- Your data protection rights.

There are three main credit reference agencies:

TransUnion

Consumer Services, TransUnion

P.O. Box 491, Leeds LS3 1WZ

Call 0330 024 7574

Visit [www.transunion.co.uk](http://www.transunion.co.uk)

Equifax PLC

Credit File Advice Centre,

P.O. Box 10036, Leicester LE3 4FS

Call 0333 321 4043

Visit [www.equifax.co.uk](http://www.equifax.co.uk)

Experian

Consumer Help Service,

P.O. Box 8000, Nottingham NG80 7WF

Call 0344 481 8000

Visit [www.experian.co.uk](http://www.experian.co.uk)

## 10. How we use Fraud Prevention Agencies

We have systems which protect our customers and ourselves against fraud and other crime. Customer information can be used to prevent crime and trace those responsible. We will share your personal information from your application with Fraud Prevention Agencies. If false or inaccurate information is provided and fraud is identified, details of this fraud will be passed to these agencies.

Law enforcement agencies may also access and use this information to prevent fraud and money laundering, for example, when:

- 10.1. Checking details on applications for credit and credit related or other facilities;
- 10.2. Managing credit and credit related accounts or facilities;
- 10.3. Recovering debt;
- 10.4. Checking details on proposals and claims for all types of insurance.

We and other organisations will access and use the information recorded by fraud prevention agencies from other countries.

Fraud prevention agencies can hold your personal data for different periods of time, and if you are considered to pose a fraud or money laundering risk, your data can be held for up to six years.

If we, or a fraud prevention agency, determine that you pose a fraud or money laundering risk, we may refuse to provide the services and financing you have requested, or to employ you, or we may stop providing existing services to you.

A record of any fraud or money laundering risk will be retained by the fraud prevention agencies, and may result in others refusing to provide services, financing or employment to you.

If you want to receive details of the fraud prevention agencies from whom we obtain and with whom we record information about you, contact us at:

Fraud Operations  
The Co-operative Bank p.l.c.  
P.O. Box 300  
Delf House  
Skelmersdale  
WN8 6NY

For further information please see [www.cifas.org.uk/fpn](http://www.cifas.org.uk/fpn)

### **11. How we manage information collected on your bank account, mortgage account and credit card statements**

Transactions which you or a joint account or card holder makes will create personal information that will appear on your statement. By making such transactions you give us your consent to process this information.

### **12. Individual Rights**

**Right to be informed** – you have the right to be informed about what we do with the data we have about you.

**Right to access** – you have the right to access personal data and supplementary information that is held about you by the Bank.

**Right to rectification** – you are entitled to have your personal data rectified if it is inaccurate or incomplete.

**Right to erasure** – you have the right to request the removal or deletion of your personal data (also known as “right to be forgotten”), where there is no compelling reason for the Bank to continue processing this data. The Bank can refuse your request where there is a legal obligation to hold the information. This will be further explained to you upon making a request.

**Right to restrict processing** – you have the right to restrict the processing of your personal data in the following circumstances (i) where you contest the accuracy of the personal data.

The Bank will restrict the processing until you have verified the accuracy of the personal data (ii) where you have objected to the processing, and until the Bank has considered the legitimate grounds to override the processing (iii) when processing is unlawful (iv) where the Bank no longer needs the personal data but you require the data to establish, exercise or defend a legal claim.

**Right to data portability** – this right allows you to move copy or transfer your personal data easily from one IT environment to another in a safe and secure way, without hindrance to usability.

**Right to object** – you have the right to object to processing for direct marketing (including profiling) purposes. The Bank can refuse this right where there is a legitimate interest for processing your personal data. This will be further explained to you upon making a request.

**Rights related to automated decision making including profiling** – you have the right to object to automated decision making without any human involvement, and to the profiling of your personal data. The Bank only carry out this type of processing where it is necessary to enter into a contract with us or where you have provided us with your consent, for example when applying for a loan or mortgage. To invoke your rights or manage your personal marketing preferences, please call us on **01752 236 550**.

### **13. Legitimate Interest Tests**

As an essential part of our business, the Bank collects, holds and manages (“processes”) data relating to our customers. The data protection regulation recognises in certain circumstances, processing may be deemed “necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection”.

To validate a specific purpose for data processing is indeed legitimate; the Bank will conduct a legitimate interests test. This will serve to balance our rights to process the data against the data protection rights of the affected individuals.

In making the decision whether or not legitimate interests may apply in each circumstance, we will ensure the balance of rights always favours the individual customer, and the processing will not cause the individual unwarranted harm by means of discrimination, damage to reputation, financial loss, and loss of confidentiality or other significant economic or social disadvantage.

## **14. Using companies to process your information outside of the EEA**

All countries in the European Economic Area (EEA), which includes the UK, have similar standards of legal protection for your personal information. We will process payments through other financial institutions such as banks and the worldwide payments system operated by the SWIFT organisation if, for example, you make a CHAPS payment or a foreign payment. Those external organisations may process and store your personal information abroad and may have to disclose it to foreign authorities to help them in their fight against crime and terrorism. If these are based outside of the EEA, your personal information may not be protected to standards similar to those in the UK.

## **15. How we may contact you**

### **Using your personal information to contact you about products and services**

If you have given us permission, we may contact you for marketing purposes, by mail, telephone, email or text message about products and services available from us. In addition, we may also contact you about products and services from other selected companies, which we believe will be of interest to you or benefit you financially. You have the right to withdraw, object to, or change your marketing preferences at any time, by calling us on 01752 236 550.

We promise not to contact you about everything – only if we think it could be appropriate and relevant to you, such as preferential savings opportunities, account upgrades or special offers. This contact may continue after your relationship with us ends.

### **Passing your information to other companies for their own direct marketing**

Unless you have given us your permission, we will not contact you on behalf of third parties, or pass your details onto them directly.

### **Using your contact information for service contact**

Making sure we deliver excellent customer service is very important to us, and to do this various methods of communication will be used when sending you information about your account. Most of the time you will be contacted by letter or telephone, but you will also be sent updates by text message or email when it is deemed to be appropriate.

## **16. When you apply for and use our products and services**

### **Using credit scoring**

When you apply for credit, an automated system known as credit scoring will be used when considering whether to agree the borrowing. It is a method of assessing your likely conduct of an account based on a range of data, including the conduct of previous similar accounts. It is a system widely used by credit providers to help make fair and informed decisions on lending.

Credit scoring takes account of information from three sources; the information you provide on your application, information provided by CRAs and information which may already be held about you by us e.g. existing account information. A credit scoring system will consider information from these sources, to make an overall assessment of your application. The credit scoring methods used are regularly tested to ensure they remain fair, effective and unbiased.

Using a credit scoring system helps us to lend responsibly. If you submit an application and it is declined through this automated process, you can contact us within 21 days to have the decision reconsidered. You also have the right to ask that the decision is not made based solely using an automated credit scoring system.

### **How we check your identity**

We will ask you to provide physical forms of identity verification when you open your account. Additionally, we will search CRA files in assessing your application. The CRA also gives us other details and information from the Electoral Register to verify your identity. The CRA keeps a record of our search, whether or not your application proceeds. Our search in this instance is not seen or used by the Bank to assess your ability to obtain credit.

### **Undertaking anti-money laundering and fraud checks**

To comply with money laundering requirements, there are times when we will need to confirm (or reconfirm) the name and address of our customers.

As part of the processing of your personal data, decisions may be made by automated means. This means we may automatically decide that you pose a fraud or money laundering risk if:

- Our processing reveals your behaviour to be consistent with that of known fraudsters or money launderers; or is inconsistent with your previous submissions; or
- You appear to have deliberately hidden your true identity.



## **Obtaining information about you and other personal details**

When you apply for a mortgage or further borrowing it will be necessary to obtain references, details of your existing financial commitments, and any other information required to assess or review lending risks, to recover debts, and to prevent or detect fraud. Where applicable, your current and previous employers, accountant, landlord, lender, bank, insurance or pension company will be contacted to obtain this information. In limited circumstances these references may need to be obtained after you open your account. This may be for regulatory purposes, or if the lending decision needs to be reviewed. Your permission to obtain these references will therefore continue to apply after your account has been opened. It will also be necessary to obtain information or documentation from your solicitor relating to any work they carry out either on your or our behalf.

## **Recording phone calls**

We will monitor or record phone calls with you in case we need to check we have carried out your instructions correctly, to resolve queries or issues, for regulatory purposes, to help improve our quality of service, and to help detect or prevent fraud or other crimes.

Conversations will also be monitored for staff training purposes.

We also use interactive voice response technology to help us manage your account and provide you with services you require.

## **Using information on social networking sites**

As part of our ongoing commitment to understanding our customers better and to improve our services, we will research comments and opinions made public on social networking sites such as Twitter and Facebook.

## **Obtaining a copy of your information**

Under data protection law, you have the right to access the personal information we hold about you. Additionally, you have the right to restrict and object to certain data processing. To request access to the information, and/or to inform us about a data restriction or objection, please write to (please ensure the request is signed to allow us to verify your identity):

Platform  
P.O. Box 237  
Plymouth  
PL1 1WG

Alternatively call us on 01752 236 550.

## **17. Your right to rectify and erase data we hold about you**

It is important the information we hold about you is accurate and up to date at all times, as holding incorrect information can have an impact on what the Bank shares with third parties such as the CRAs, taxation authorities and fraud prevention authorities.

If you believe we are holding any information relating to you which is incorrect please contact us to let us know what is wrong, and we will work with you to put it right.

## **18. How we protect your information**

We are committed to taking appropriate technical, physical and organisational measures to protect customer and colleague personal information against unauthorised access, unlawful processing, accidental loss or damage, and unauthorised destruction.

We use secure servers to enable you to make enquiries or access your account information, which encrypts your information before it is sent to us. We also take appropriate measures to ensure the information disclosed to us is kept secure, accurate and up-to-date and kept only for as long as necessary for the purposes which it is used.

We limit access to our internal systems which hold personal information to a selected group of authorised users who are given access to such systems through the use of a unique identifier and password. Access to personal information is limited to and provided to individuals for the purpose of performing their work duties.

## **19. Cookies**

Cookies are used to store small amounts of information on your computer, which allows certain information from your web browser to be collected. Cookies are widely used on the internet. Please refer to our Cookies Policy for further information at [platform.co.uk/privacy-and-cookies/cookie-policy](https://platform.co.uk/privacy-and-cookies/cookie-policy)

## **20. Changes to privacy notice**

We will update this notice to reflect changes to our information practices. If we make any material changes we will notify you by means of a notice on our website prior to the change becoming effective.

We encourage you to periodically review [platform.co.uk/privacy-and-cookies/privacy-policy](https://platform.co.uk/privacy-and-cookies/privacy-policy) for the latest information on our privacy practices.

## 21. Complaints about how we process your personal information

We know sometimes things go wrong, and here at the Bank we really value your feedback. Letting us know when you are not happy with our products and services provides us with the opportunity to put it right as quickly as possible and helps us to improve our service for all our customers.

Our promise is to:

- Treat your complaint fairly and promptly;
- Try to resolve complaints straight away, when you first contact us; and
- Keep you informed of our progress.

You can contact us via email at [complaints@co-operativebank.co.uk](mailto:complaints@co-operativebank.co.uk). Alternatively, you can call us on 03457 212 212\*, call in to your nearest branch or write to us at:

Customer Response  
The Co-operative Bank p.l.c.  
P.O. Box 101  
1 Balloon St  
Manchester  
M60 4EP

The Bank would always suggest that any communication with us is by a secure method and would not encourage use of unsecured email if you are including personal information. If you still wish to contact us by email and/or request an answer by email that may contain personal information we would make you aware of the following:

- We use Transport Layer Security (TLS) to encrypt and protect email traffic. If your mail server does not support TLS, you should be aware that any emails you

send to us, or emails you request from us, may not be protected in transit;

- The Bank may choose not to reply with certain types of information via email, therefore please include alternative contact details; and
- Please be aware, we cannot accept file attachments that are larger than 20MB.

## 22. Contact details for the Bank Data Protection Officer

If you wish to contact the Data Protection Officer in relation to any questions or confidential queries about this privacy notice or the information we hold and process about you, please email [data.protection@co-operativebank.co.uk](mailto:data.protection@co-operativebank.co.uk) or write to us at:

The Data Protection Officer  
The Co-operative Bank p.l.c.  
P.O. Box 101  
1 Balloon Street  
Manchester  
M60 4EP

## 23. Contact details for the Information Commissioner's Office

If you wish to contact the Information Commissioner for advice or to complain about the way you believe your information is used, please find their address and website below.

The Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
SK9 5AF  
Website: [www.ico.org.uk](http://www.ico.org.uk)

## Please call 01752 236 550\* ~ if you would like to receive this information in an alternative format such as large print, audio or Braille.

The Co-operative Bank p.l.c. is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority (No.121885). The Co-operative Bank, Platform, smile and Britannia are trading names of The Co-operative Bank p.l.c., P.O. Box 101, 1 Balloon Street, Manchester M60 4EP. Registered in England and Wales No.990937. Credit facilities are provided by The Co-operative Bank p.l.c. and are subject to status and our lending policy. The Bank reserves the right to decline any application for an account or credit facility. The Co-operative Bank p.l.c. subscribes to the Standards of Lending Practice which are monitored by the Lending Standards Board.

\*Calls to 01 and 03 number are charged at your standard rate, calls may be monitored or recorded for security and training purposes.

–Lines open 08:30 - 17:30 Monday to Friday.

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[platform.co.uk](http://platform.co.uk)