WESLEYAN BANK
part of the HTB group

Wesleyan Bank Limited
80 Fenchurch Street,
London EC3M 4BY

T 0800 358 1122
www.wesleyanbank.co.uk

Privacy notice

Important information and who we are

- We are Wesleyan Bank Limited ("**Wesleyan Bank**"), our company registration number is 02839202 and our registered office is 80 Fenchurch Street, London EC3M 4BY.
- This Privacy Notice explains how and why Wesleyan Bank use your personal data. Where we use terms such as "we", "us" and "our" in this policy, we mean Wesleyan Bank.
- **We are committed to protecting the privacy and security of your personal information. We ask that you read this Privacy Notice carefully as it contains important information regarding your personal information**. You should also read any other privacy notices that we give you, that might apply to our use of your personal data in specific circumstances from time to time.
- For the purposes of data protection law, including the Data Protection Acts 1998 and 2018 and the General Data Protection Regulation (together, **DP Law**) Wesleyan Bank is a data "controller". This is a legal term which means that we are responsible for deciding how we hold and use personal information about you.
- This Privacy Notice explains what we do with any personal information which we collect from you, including when you use our website and when you interact with us in other ways offline, for example during the credit application process.
- **Please note that you do not have to transfer your information to us; however, if you do not, it will severely limit your ability to use our products and services – in particular, you will not be able to have a bank account with us**.
- At the foot of this Notice we have included **contact details for our Data Protection Officer**, which you can use if you wish to ask us for further information or to exercise your rights.
- We reserve the right to change the policy at any time, so please check back regularly to keep informed of updates to this Notice.

What type of personal information do we collect?

Depending on the services and products we provide to you, we may collect, store, and use the following categories of personal information about you:

Who you are

- Where you live and how to contact you;
- Your name;
- Your date of birth and/or age;
- Your home address and correspondence address (where this is different) and address history;
- Details about you that are stored in documents in different formats, or copies of them. This could include things like your passport, driving license or birth certificate, if this is necessary for us to comply with our legal and regulatory requirements;
- Your marital status, family, lifestyle or social circumstances if relevant to the application (for example the number of dependents you have);

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- What we learn about you from letters, emails and conversations between us;
- Details of the devices and technology you use;
- Usage data about how you use our products and services;
- Personal data which we obtain from Fraud Prevention Agencies (see the section on Fraud Prevention Agencies below);
- Your marketing preferences;
- Where you "like" us or make posts on our pages on social networking websites, such as Facebook, YouTube and Instagram;
- If you take a survey or interact with us in various other ways – demographics information and information about subjects that may interest you.

Financial Information

- Your financial position, status and history;
- Your salary and other sources of income;
- Any savings;
- Bank account details, payroll records, tax status information and credit scores;
- Details of any personal or corporate insolvency proceedings involving you;
- Information about your employment records (including salary, pension and benefits information, job titles, work history, working hours, training records and professional memberships, location of employment or workplace);
- Information about your registration with professional bodies and Companies House, and any sanctions made against you
- 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), court judgments decrees and administration orders made publicly available through statutory public registers (see the section on Credit Reference Agencies below).

Special Categories of Personal Data

We may also (in limited circumstances) collect, store and use the following "special categories" of more sensitive personal information:

- Information about your race, ethnicity or sexual orientation (where any of these could be established from information you provide to us);
- Information about your physical and mental health, including any medical condition, health and sickness records (where this is relevant to products we offer, processing any subsequent claims, or collecting debts from you);
- Information about criminal convictions and offences (as part of our fraud prevention checks).

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How is your personal information collected?

Directly from you

We may collect your personal data from you directly including by the following means:

- Enquiry, quotes, claim and application forms you submit or emails or correspondence you may send to us;
- When you consider purchasing or actually purchase a product or service from us;
- Telephone calls with you (which may be recorded);
- Via cookies and IP addresses when you access our websites, applications, social media (such as Facebook pixels) or emails (see our cookie policy for further information);
- When you open a Wesleyan Bank account;
- When you carry out transactions through our website or any related websites;
- Information we have gathered from asking you to respond to surveys or if you take part in our competitions or promotions.

By passing us any information about another person, you confirm you have their authority to share that information with us.

From third parties we work with

We may also collect your information from third parties such as:

- Companies that introduce you to us;
- Brokers;
- Social networks;
- Fraud, money-laundering and sanctions prevention agencies;
- Public information sources such as Companies House, court decisions, bankruptcy registers and the electoral register;
- Agents working on our behalf, including tracing agents;
- Your and our solicitors;
- Credit Reference Agencies ("CRAs") or other background check agencies (see further details below);
- Medical professionals (where you have agreed to this);
- Government and law enforcement agencies;
- Debt counselling and debt management agencies and charities.

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How we use your personal information

We collect and process your data for several purposes, and for each purpose Wesleyan Bank must explain to you the legal ground which justifies our processing your personal data. The following are the legal grounds that are relevant to us. Some of these grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

Processing is necessary to perform our contract with you for a product or service or for taking steps prior to entering into a contract during the application stage:

- To identify you and, if applicable, the Companies you own or of which you are a director;
- Evaluating your application and providing you with a quote (this may be provided directly by us or a third party);
- To carry out credit checks (see further details below);
- Administering and servicing the contract we have entered into with you (or propose to enter into with you) and managing the product or facility, which may include any mutual benefits that you may be entitled to;
- Administering and managing your account and associated services, updating your records, tracing your whereabouts to contact you about your account and doing this for the recovery of debt;
- Sharing your personal data with certain third-party service suppliers such as payment service providers;
- All stages and activities relevant to managing your account including enquiry, application, administration and management of accounts, illustrations, requests for transfers of equity, setting up/changing/removing guarantors; closing of accounts;
- To manage how we work with other companies that provide services to us and our customers;
- To manage fees, charges and interest due on customer accounts;
- To exercise our rights set out in agreements and contracts.

Processing necessary to comply with our legal obligations:

- To verify your identity in order to comply with anti-money laundering regulations and to carry our checks with Fraud Prevention Agencies pre-application, at the application stage and periodically after that;
- To comply with laws that apply to us;
- To establish, defend and enforce our legal rights or those of any other member of the Hampshire Trust Bank Plc Group of Companies;
- For activities relating to the prevention, detection and investigation of crime;
- To carry out monitoring and to keep records;
- To deal with requests from you to exercise your rights under data protection laws;
- 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 report to our regulators, authorities and auditors about product and services we provide to you.

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To pursue our legitimate interests, provided your interests and fundamental rights do not override those interests

- Anti-fraud and money laundering purposes;
- Providing you with information about products and services based upon any preferences you may have expressed and/or which we think might be of interest (marketing purposes);
- Recovering debt (this may include carrying out credit checks – see further details below);
- Complaints management (if you are not happy with the service that we have provided to you);
- Business management and planning, including quality, reporting, testing, training, accounting, auditing purposes and market research;
- Running events and/or competitions;
- To produce and consider management information and reports internally.

Where we have your consent

Providing you with information about our products and services based upon any preferences you may have expressed and/or which we think might be of interest (marketing purposes). Please note that you have the right to withdraw consent - please see Your Rights and Duties section below.

Change of our use

- We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.
- Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

What happens if you fail to provide us with the information we ask for

- If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into (or are proposing to enter into) with you or we may be prevented from complying with our legal obligations (such as detecting or investigating fraud) and so we may be required to decline an application to provide a product or service to you.

How we use particularly sensitive personal information

Special categories of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

- With your explicit consent;

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- Where it is in the substantial public interest and in line with our data protection policy;

- Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

We may approach you for your approval to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it. Without this approval, in some circumstances, you may not be able to benefit from some of our services.

Information about Criminal Convictions

- We will only collect this type of information if it is necessary given the nature of the service we are providing you with or where we are legally obliged to do so e.g. as part of our fraud and anti-money laundering prevention checks.

- Less commonly, we may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

Automated decision making, fraud prevention and credit referencing

What is automated decision making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We are allowed to use automated decision-making in the following circumstances:

- Where it is necessary for entering into or to perform the contract with you and appropriate measures are in place to safeguard your rights.

- In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights and freedoms and legitimate interests.

- If we make an automated decision on the basis of any particularly sensitive personal information, we must have either your explicit written consent or it must be justified in the public interest and we must also put in place appropriate measures to safeguard your rights and freedoms and legitimate interests.

As part of the processing of your personal data, decisions may be made by automated means by putting your information into a system and the decision is calculated using automatic processes.

We may make automated decisions about you in the following situations:

- Where you pose a fraud or money laundering risk e.g. 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 and/or you have provided false or inaccurate information. The results of these checks may affect the type of products and services we can offer you.

Your rights

- You have rights in relation to automated decision-making: if you want to know more please contact our Data Protection Officer, details of which can be found at the end of this privacy notice. If we are unable to undertake the checks outlined above, it may not be possible for us to offer certain services or products to you.

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Fraud Prevention Agencies

- When we and fraud prevention agencies process your personal data, we do so on the basis that we have a legitimate interest in preventing fraud and money laundering and to verify your identity in order to protect our business and to comply with laws that apply to us. Such processing is also a contractual requirement of the services or financing you have requested.

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

- We, and fraud prevention agencies may also enable law enforcement agencies to access and use your personal data to detect, investigate and prevent crime.

- 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 have any questions about this, please contact us on the details below.

- 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 and may result in others refusing to provide products, services, financing or employment to you.

Credit Scoring and Credit Reference Agencies

- Where we use credit scoring, this means existing and historic data about you may be used to determine your creditworthiness. The identities of the Credit Reference Agencies, and the ways in which they use and share personal information, are explained in more detail at **www.experian.co.uk/crain**.

- A credit reference check will add to your record details of our searches and your application. This record (but not our name) will be seen by other organisations when you apply for credit in the future. A large number of applications within a short period of time could affect your ability to obtain credit.

We will carry out 'credit searches' on individuals in the following circumstances:

- When you apply for credit in your own name (including as 'sole traders' and as 'partners' in partnerships).

- When we require you to personally guarantee the credit agreements of a company or companies, and we wish to credit-assess you personally as part of the creditworthiness assessment.

- If you default on your credit agreement or any of those that you personally guarantee.

Who do we share your personal information with?

We will share your data with third parties, including third-party service providers and our parent company, Hampshire Trust Bank Plc and other entities in the Hampshire Trust Bank Plc Group of Companies. We require third parties to respect the security of your data and to treat it in accordance with the law. If you are a joint applicant or you have a joint product or policy, we may disclose your information where necessary to other joint applicants.

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We may transfer or disclose your personal data to the following categories of recipients:

- Hampshire Trust Bank Plc and its Group Companies as part of our regular reporting activities on company performance, in the context of a business re-organisation, possible sale or group restructuring exercise, for system maintenance support and hosting of data or to help us identify products and services which may be of interest to you.
- Third-party service providers (including IT suppliers, auditors, marketing agencies, market researchers, document management providers and underwriting services).
- Other third parties who are associated with the supply of products and services in relation to the contract we hold with you e.g. third-party providers/lenders who form part of our panel(s). If you would like further information on these third parties, please contact our Data Protection Officer (see contact details below).
- Our regulators (Financial Conduct Authority (FCA), Prudential Regulatory Authority (PRA), Information Commissioners Office (ICO)) and the Financial Ombudsman Service (FOS).
- Government agencies/ law enforcement.
- Fraud prevention agencies and credit reference agencies (please see additional details above).
- Third parties who provide funding to us or to whom we may assign of transfer our business or parts of our business.

Why do we need to share your personal information with third parties?

- We may share your personal information with third parties where required by law, where it is necessary to administer the contracts we, or a third party may, have with you, where we have another legitimate interest in doing so or where you have asked us to pass your data to a third party e.g. lawyers, other mortgage providers etc. We also share personal data for crime and fraud prevention, credit reference and the apprehension and prosecution of offenders.

Where do we process and store your information or transfer it?

- We generally process your information through servers in the UK and EEA. Occasionally there may be circumstances where we are required to transfer your personal information to countries outside the European Economic Area (EEA).
- To ensure that your personal information does receive an adequate level of protection when transferred outside the EEA, we will make sure suitable safeguards are in place in accordance with UK data protection requirements to protect the data.

For example, these safeguards might include:

- Sending personal information only to a country that's been approved by the UK authorities as having a suitably high standard of data protection law. Examples include the European Economic Area, Isle of Man, Switzerland and Canada;
- Putting in place a contract with the recipient containing terms approved by the UK authorities as providing a suitable level of protection;
- Carrying out an international transfer risk assessment to assess the risk of transferring the personal data to the relevant country and assessing whether there are additional safeguards that could be put in place to make the transfer more secure;
- Sending the data to an organisation which is a member of a scheme that's been approved by the UK authorities as providing a suitable level of protection. One example is Binding Corporate Rules

If you require further information about these protective measures you can request it from our Data Protection Officer.

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What data security measures do we apply?

- We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

- We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so. For more information about how we protect your information, please visit our security page.

How long do we keep your data?

- We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

- To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

- The lengths of time for which we will keep personal data will vary depending on the circumstances but will be in line with relevant laws and regulations, official guidance, and our audit requirements.

- In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

Your Rights and Duties

Your duty to inform us of changes

- It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us. You can do this by emailing us at **enq@wesleyanbank.co.uk** or by telephone on **0800 358 1122**.

- You can update your marketing preferences by contacting us at **enq@wesleyanbank.co.uk** or via general enquiries on **0800 358 1122**, Monday to Friday 9.00am - 5.00pm.

Your Rights in connection with your personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third

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party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.

- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for us processing it.

- **Request the transfer** of your personal information to another party.

- **Right to Withdraw Consent** - In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact our Data Protection Officer. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

How to exercise your Rights

- If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please **contact our Data Protection Officer** using the details below.

- **No fee usually required** - You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

- **What we may need from you** - We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Data Protection Officer

We have appointed a Data Protection Officer (DPO) to oversee compliance with this Privacy Notice. If you have any questions about this Privacy Notice or how we handle your personal information, please contact our DPO. While we hope you can discuss issues with the DPO, you also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

Changes to this Privacy Notice

We keep this Notice under regular review. We may change this Notice from time to time by updating this page in order to reflect change in the law and/or our privacy practices. The date at the top of this notice will be updated accordingly and we encourage you to check this from time to time for any updates or changes. Where you have provided us with your email address, we may also contact you to let you know that we have updated the Notice. We may also notify you in other ways from time to time about the processing of your personal information. If you have any questions about this Privacy Notice, please contact our Data Protection Officer. You can contact our Data Protection Officer in one of the following ways:

- By writing to our Data Protection Officer at
  Data Protection Officer, Wesleyan Bank Limited, 80 Fenchurch Street, London EC3M 4BY; or

- By sending an e-mail to our Data Protection Officer at **dataprotectionofficer@htb.co.uk**